

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of )  
TimkenSteel Corporation for Approval of a ) Case No. 15-1857-EL-AEC  
Unique Arrangement for the TimkenSteel )  
Corporation's Stark County Facilities.

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**MOTION TO INTERVENE AND COMMENTS OF  
THE OHIO MANUFACTURERS' ASSOCIATION ENERGY GROUP**

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Pursuant to R.C. 4903.221 and Ohio Adm. Code 4901-1-11 and 4901:1-38-05(F), the Ohio Manufacturers' Association Energy Group (OMAEG) respectfully moves the Public Utilities Commission of Ohio (Commission) for leave to intervene and submit comments in this matter with the full powers and rights granted to intervening parties. OMAEG has a real and substantial interest that may be adversely affected by this proceeding and that interest cannot be adequately represented by any existing parties. Because OMAEG satisfies the standard for intervention set forth in the Commission's rules and by statute, the motion should be granted. A memorandum in support is attached.

Respectfully submitted,



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*Counsel for the OMAEG*

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**MEMORANDUM IN SUPPORT**

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On November 2, 2015, TimkenSteel filed an application seeking approval of a unique arrangement.<sup>1</sup> The application seeks to replace the current unique arrangement between TimkenSteel and the Ohio Power Company (AEP-Ohio), which is scheduled to expire on December 31, 2015.<sup>2</sup> As explained below, OMAEG has a real and substantial interest in the outcome of this proceeding.

Ohio Adm. Code 4901-1-11 permits intervention by a party who has a real and substantial interest in the proceeding and who is so situated that the disposition of the proceeding may impair or impede its ability to protect that interest and whose interest is not adequately represented by an existing party. Likewise, R.C. 4903.221 authorizes intervention where a party: may be adversely affected by the proceeding; will contribute to a full development and equitable resolution of factual issues; and will not unduly prolong or delay the proceedings.

OMAEG is a non-profit entity that strives to improve business conditions in Ohio and drive down the cost of doing business for Ohio manufacturers. OMAEG members and their representatives work directly with elected officials, regulatory agencies, the judiciary, and the media to provide education and information to energy consumers, regulatory boards and

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<sup>1</sup> See TimkenSteel's Application at 1 (November 2, 2015).

<sup>2</sup> Id.

suppliers of energy; advance energy policies to promote an adequate, reliable, and efficient supply of energy at reasonable prices; and advocate in critical cases before the Commission. OMAEG members purchase electric power services from AEP-Ohio and may be responsible for paying any delta revenue arising from this unique arrangement via AEP-Ohio's economic development rider. OMAEG has been a participant in other cases involving unique arrangements,<sup>3</sup> and has an interest in ensuring that any benefits accruing to customers, and the resultant discounted rates that are wholly funded by other AEP-Ohio ratepayers, are just and reasonable.<sup>4</sup> The unique arrangement must also further the policy of the state of Ohio embedded in Section 4928.02 of the Revised Code.<sup>5</sup> For example, OMAEG has an interest in ensuring that no unreasonable or anticompetitive effects arise from TimkenSteel's request to be placed in its own class under AEP-Ohio's Basic Transmission Cost Rider (BTCR) and pay for transmission service through the BTCR rider "based on TimkenSteel's annual single EDU transmission coincident peak."<sup>6</sup>

OMAEG has a direct, real, and substantial interest in the issues raised in this proceeding and is so situated that the disposition of the proceeding may, as a practical matter, impair or impede its ability to protect that interest. OMAEG is regularly and actively involved in

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<sup>3</sup> See, e.g., *In the Matter of the Application of Republic Steel for Approval of a Unique Arrangement for Republic Steel's Lorain, Ohio Facility*, Case No. 13-1913-EL-AEC, Entry at 2 (November 12, 2013) (granting OMAEG's motion to intervene).

<sup>4</sup> Ohio Adm. Code 4901:1-38-05(B).

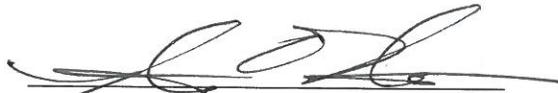
<sup>5</sup> Ohio Adm. Code 4901:1-38-05(C).

<sup>6</sup> See TimkenSteel's Application at 3-4, 32 (November 2, 2015); see Staff testimony expressing concern with "possible impacts to other non-participating ratepayers if the [transmission rider opt-out] Pilot Program is approved." *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143, in the Form of an Electric Security Plan*, Case No. 14-1297-EL-SSO, Staff Witness Turkenton at 5 (September 18, 2015).

Commission proceedings and, as in previous proceedings, OMAEG's unique knowledge and perspective will contribute to the full development and equitable resolution of the factual issues in this proceeding. OMAEG's interest will not be adequately represented by other parties to the proceeding and its timely intervention will not unduly delay or prolong the proceeding.

Because OMAEG satisfies the criteria set forth in R.C. 4903.221 and Ohio Adm. Code 4901-1-11, it is authorized to intervene with the full powers and rights granted by the Commission to intervening parties. OMAEG respectfully requests that the Commission grant this motion for leave to intervene and that OMAEG be made a full party of record.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was served upon the following parties via electronic mail on November 20<sup>th</sup>, 2015.



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Summary: Motion Motion To Intervene And Comments Of The Ohio Manufacturers' Association Energy Group electronically filed by Ms. Cheryl A Smith on behalf of The Ohio Manufacturers' Association