

BOEHM, KURTZ & LOWRY

ATTORNEYS AT LAW
36 EAST SEVENTH STREET
SUITE 1510
CINCINNATI, OHIO 45202
TELEPHONE (513) 421-2255
TELECOPIER (513) 421-2764

Via E-FILE

February 10, 2020

Public Utilities Commission of Ohio
PUCO Docketing
180 E. Broad Street, 10th Floor
Columbus, Ohio 43215

In re: Case No. 20-0349-EL-RDR

Dear Sir/Madam:

Please find attached JSW STEEL OHIO, INC's MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT and e-filed today in the above-referenced matter.

Copies have been served on all parties on the attached certificate of service. Please place this document of file.

Respectfully yours,


Michael L. Kurtz, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

MLKkew

Encl.

Cc: Certificate of Service

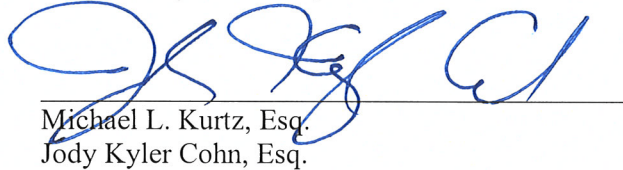
**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power Company to Adjust the Economic Development Cost Recovery Rider Rate	: :	20-0349-EL-RDR
---	--------	----------------

**MOTION TO INTERVENE
OF JSW STEEL OHIO, INC.**

Pursuant to R.C. 4903.221 and Ohio Adm. Code 4901-1-11, JSW Steel Ohio, Inc. ("JSW Steel") moves for leave to intervene in this proceeding. The Public Utilities Commission of Ohio ("Commission") should grant JSW Steel leave to intervene because JSW Steel has a real and substantial interest in the proceeding, and the Commission's disposition of this proceeding may impair or impede JSW Steel's ability to protect that interest.

Respectfully submitted,



Michael L. Kurtz, Esq.
Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: mkurtz@BKLawfirm.com

jkylercohn@BKLawfirm.com

February 10, 2020

COUNSEL FOR JSW STEEL OHIO, INC.

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power Company to Adjust the Economic Development Cost Recovery Rider Rate	: :	20-0349-EL-RDR
---	--------	----------------

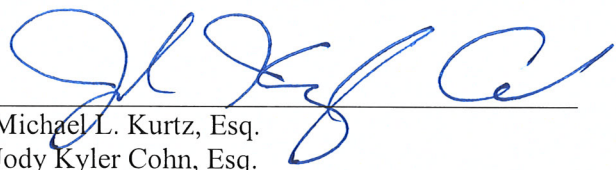
**MEMORANDUM IN SUPPORT OF
JSW STEEL OHIO, INC's MOTION TO INTERVENE**

Pursuant to R.C. 4903.221 and Ohio Adm. Code 4901-1-11, JSW Steel files this Memorandum in Support of its Motion to Intervene.

JSW Steel is a large energy-user that purchases electric service from Ohio Power Company pursuant to a reasonable arrangement approved by the Commission. The interests of JSW Steel may be directly affected by the outcome of this proceeding and cannot be adequately represented by any other party. JSW Steel's intervention would not unduly delay the proceeding nor unjustly prejudice any existing party. JSW Steel intends to play a constructive role in this case and provide information which will assist the Commission.

Accordingly, JSW Steel has a real and substantial interest and is entitled to intervene in this action under R.C. 4903.221 and Ohio Adm. Code 4901-1-11.

Respectfully submitted,



Michael L. Kurtz, Esq.

Jody Kyler Cohn, Esq.

BOEHM, KURTZ & LOWRY

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

Ph: (513) 421-2255 Fax: (513) 421-2764

E-Mail: mkurtz@BKLawfirm.com

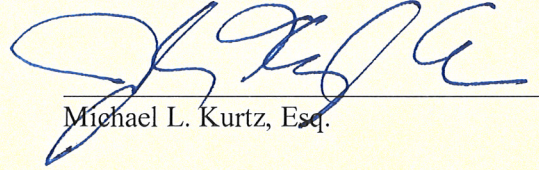
jkylercohn@BKLawfirm.com

COUNSEL FOR JSW STEEL OHIO, INC.

February 10, 2020

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 10th day of February 2020 to the following:

A handwritten signature in blue ink, appearing to read "Michael L. Kurtz", is written over a horizontal line.

Michael L. Kurtz, Esq.

Jody Kyler Cohn, Esq.

OHIO POWER COMPANY
NOURSE, STEVEN T. MR.
AMERICAN ELECTRIC POWER
1 RIVERSIDE PLAZA, 29TH FLOOR
COLUMBUS OH 43215

*BLEND, CHRISTEN M. MS.
AMERICAN ELECTRIC POWER SERVICE CORPORATION
1 RIVERSIDE PLAZA 29TH FLOOR
COLUMBUS OH 43215

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

2/10/2020 4:23:41 PM

in

Case No(s). 20-0349-EL-RDR

Summary: Motion JSW Steel Ohio's Motion to Intervene and Memorandum in Support electronically filed by Mr. Michael L. Kurtz on behalf of JSW Steel Ohio, Inc.