

**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.	: : :	22-745-EL-RDR
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**MOTION TO INTERVENE  
OF JSW STEEL OHIO, INC.**

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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,

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.

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August 2, 2022

**COUNSEL FOR JSW STEEL OHIO, INC.**

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

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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,

/s/ Michael L. Kurtz

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August 2,, 2022

**COUNSEL FOR JSW STEEL OHIO, INC.**

## **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 2<sup>nd</sup> day of August, 2022 to the following:

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.

Jody Kyler Cohn, Esq.

\*Nourse, Steven T. Mr.  
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**This foregoing document was electronically filed with the Public Utilities  
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**in**

**Case No(s). 22-0745-EL-RDR**

Summary: Motion JSW STEEL OHIO, INC's MOTION TO INTERVENE AND  
MEMORANDUM IN SUPPORT electronically filed by Mr. Michael L. Kurtz on behalf  
of JSW Steel Ohio, Inc.