

**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.	: : :	23-101-EL-RDR
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**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,

/s/ Michael L. Kurtz

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February 1, 2023

COUNSEL FOR JSW STEEL OHIO, INC.

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**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,

/s/ Michael L. Kurtz

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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 1st day of February, 2023 to the following:

/s/ Michael L. Kurtz

Michael L. Kurtz, Esq.

Jody Kyler Cohn, Esq.

*Nourse, Steven T. Mr.
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Case No(s). 23-0101-EL-RDR

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