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September 3, 2008

VIA FEDERAL EXPRESS

Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, Ohio 43215-3793

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2008 SEP -4 AM 10:54

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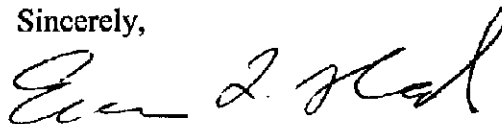
Re: Enclosed Documents for Filing in Case Nos. 08-917-EL-SSO and 08-918-EL-SSO

Dear Sir or Madam:

Enclosed for filing in Case Nos. 08-917-EL-SSO and 08-918-EL-SSO please find an original and 20 copies of the Motion to Intervene and Memorandum In Support of Ormet Primary Aluminum Corporation, and the Motion for Admission Pro Hac Vice of Clinton A. Vince, Emma F. Hand and Presley R. Reed.


Also enclosed are two extra copies of each document to be date-stamped and returned to me in the enclosed, self-addressed Federal Express envelope. Thank you for your assistance in this matter, if you have any questions please contact me at the number above.

Sincerely,



Emma F. Hand

Enclosures

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business
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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of
Columbus Southern Power Company for
Approval of its Electric Security Plan; and
Amendment to its Corporate Separation
Plan; and the Sale or Transfer of Certain
Generating Assets.**

Case No. 08-917-EL-SSO

**In the Matter of the Application of Ohio
Power Company for Approval of its
Electric Security Plan; and an
Amendment to its Corporate Separation
Plan.**

Case No. 08-918-EL-SSO

**MOTION TO INTERVENE OF
ORMET PRIMARY ALUMINUM CORPORATION**

Ormet Primary Aluminum Corporation ("Ormet") hereby respectfully moves to intervene in the above-captioned matters pursuant to Ohio Revised Code Section 4903.221 and Section 4901-1-11 of the Commission's Code of Rules and Regulations, with full powers and rights granted by the Commission specifically, by statute, or by the provisions of the Commission's Code of Rules and Regulations to intervening parties. The reasons for granting this motion are contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,



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*Attorneys for Ormet Primary Aluminum
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Dated: September 4, 2008

**In the Matter of the Application of
Columbus Southern Power Company for
Approval of its Electric Security Plan; and
Amendment to its Corporate Separation
Plan; and the Sale or Transfer of Certain
Generating Assets.**

Case No. 08-917-EL-SSO

In the Matter of the Application of Ohio Power Company for Approval of its Electric Security Plan; and an Amendment to its Corporate Separation Plan.

Case No. 08-918-EL-SSO

Ormet Primary Aluminum Corporation (“Ormet”) should be permitted to intervene in these matters pursuant to Section 4903.221, Ohio Revised Code and the Commission’s Rules and Regulations contained in Section 4901-1-11 of the Ohio Administrative Code. The outcome of these proceedings could impact the rates Ormet pays for electricity.

Under Section 4903.221, any person who may be adversely affected by a Commission proceeding may intervene in such proceeding. The Commission's rules state that any person shall be permitted to intervene in a proceeding upon a showing that:

The person has a real and substantial interest in the proceeding, and the person is so situated that the disposition of the proceeding may, as a practical matter, impair or impede his or her ability to protect that interest, unless the person's interest is adequately represented by existing parties.¹

Ormet has a substantial interest in this proceeding. Ormet owns an aluminum reduction facility in Hannibal, Ohio. The reduction facility is physically located in the AEP zone of PJM.

¹ Ohio Admin. Code § 4901-1-11(A)(2) (2007).

and takes generation, transmission and distribution services from Columbus Southern Power Company and Ohio Power Company (collectively, "AEP Ohio") under an electric service agreement entered into in accordance with the Stipulation reached in Case No. 05-1057-EL-CSS, as modified by the Supplemental Agreement approved by the Commission in Case Nos. 07-1132-EL-UNC, *et al.* (collectively, "Agreement"). This Agreement between Ormet and AEP Ohio expires on December 31, 2008. If Ormet is unable to enter into a satisfactory replacement agreement with AEP Ohio, Ormet would be subject to AEP Ohio's standard service offer. Therefore, Ormet could be subject to the electricity rates approved as an outcome of this proceeding and has a substantial interest in this proceeding.

Ormet's facility contributes substantially to the economy in Monroe County, an extremely economically depressed area of Ohio. With its reduction facility in full operation, Ormet Primary (1) has 1,027 employees with wages totaling approximately \$56,000,000 per year; (2) covers approximately 7,000 of its workers', retirees', and family members' health care, at a cost of more than \$16,000,000 per year; (3) pays approximately \$300,000 annually in taxes to Monroe County and its School District; and (4) purchases approximately \$15,000,000 to \$20,000,000 per year in goods and services in the Ohio Valley.

Ormet is particularly sensitive to rate increases. Historically, power expense represents about 36 percent of the cost of producing aluminum. The aluminum business is very competitive, is very sensitive to overall economic conditions and normally survives on small margins. Ormet competes with smelters throughout the nation and the rest of the world, many of which pay much less for their power than does Ormet. Most – if not all – smelters facing delivered power costs higher than those paid by Ormet have been shut down.

In deciding whether to permit intervention under Section 4901-1-11(B), the Commission considers:

- (1) the nature and extent of the prospective intervenor's interest;
- (2) the legal position advanced by the prospective intervenor and its probable relation to the merits of the case;
- (3) whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings;
- (4) whether the prospective intervenor will significantly contribute to the full development and equitable resolution of the factual issues; and
- (5) the extent to which the person's interest is represented by existing parties.

As described above, Ormet is a customer of AEP Ohio and could become subject to AEP Ohio's standard service offer rates as of January 1, 2009, thus Ormet has an interest in ensuring that AEP Ohio's rates remain just and reasonable. Ormet's intervention is timely and will not unduly prolong or delay the proceedings. Ormet's unique relationship with AEP will also assist in the full development and equitable resolution of the factual issues and indicates that no other party can adequately represent Ormet's interest in these proceedings.

WHEREFORE, Ormet respectfully requests that the Commission grant its motion to intervene in this proceeding.

Respectfully submitted,



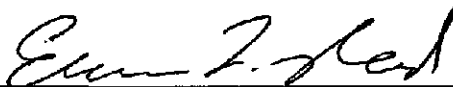
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Dated: September 4, 2008

CERTIFICATE OF SERVICE

I hereby certify that a copy of Ormet Primary Aluminum Corporation's Motion to Intervene and Memorandum in Support were served by U.S. Mail upon counsel identified below for all parties of record this 4th day of September, 2008.



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