



SNR DENTON 

SNR Denton US LLP
1301 K Street, NW
Suite 600, East Tower
Washington, DC 20005-3364 USA

Emma F. Hand
Partner
emma.hand@snrdenton.com
D +1 202 408 7094
T +1 202 408 6400
F +1 202 408 6399
snrdenton.com

February 22, 2011

BY FEDERAL EXPRESS

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

RECEIVED-DOCKETING DIV
2011 FEB 23 AM 9:51
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Re: *In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company, Individually and, if Their Proposed Merger is Approved, as a Merged Company (collectively, AEP Ohio) for an Increase in Electric Distribution Rates, Case Nos. 11-351-EL-AIR, 11-352-EL-AIR;*

In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company, Individually and, if Their Proposed Merger is Approved, as a Merged Company (collectively AEP Ohio) for Tariff Approval, Case Nos. 11-353-EL-ATA, 11-354-EL-ATA;

In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company, Individually and, if Their Proposed Merger is Approved, as a Merged Company (collectively AEP Ohio) for Approval to Change Accounting Methods, Case Nos. 11-356-EL-AAM, 11-358-EL-AAM

Dear Sir or Madam:

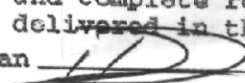
Enclosed please find an original and twenty (20) copies each of the *Motion to Intervene of Ormet Primary Aluminum Corporation* and the *Motion for Admission Pro Hac Vice of Clinton A. Vince, Douglas G. Bonner, Daniel D. Barnowski and Emma F. Hand*. These documents were originally filed by facsimile on February 22, 2011. Two additional copies of each document are enclosed 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 telephone number above.

Sincerely,



Emma F. Hand
Partner

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.
Technician  Date Processed 2-23-11

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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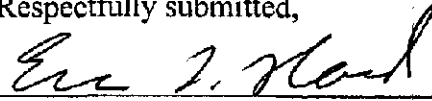
In the Matter of the Application of)	
Columbus Southern Power Company and)	
Ohio Power Company, Individually and, if)	Case No. 11-351-EL-AIR
Their Proposed Merger is Approved, as a)	Case No. 11-352-EL-AIR
Merged Company (collectively, AEP Ohio))	
for an Increase in Electric Distribution Rates)	
)	
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Merged Company (collectively AEP Ohio))	
for Tariff Approval)	
)	
In the Matter of the Application of)	
Columbus Southern Power Company and)	
Ohio Power Company, Individually and, if)	Case No. 11-356-EL-AAM
Their Proposed Merger is Approved, as a)	Case No. 11-358-EL-AAM
Merged Company (collectively AEP Ohio))	
for Approval to Change Accounting Methods)	

**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,



Clinton A. Vince, Counsel of Record

Douglas G. Bonner

Daniel D. Barnowski

Emma F. Hand

Keith C. Nusbaum (#0082745)

SNR Denton US LLP

1301 K Street NW

Suite 600, East Tower

Washington, DC 20005

202.408.8004 Telephone

202.408.6399 Facsimile

clinton.vince@snrdenton.com

doug.bonner@snrdenton.com

dan.barnowski@snrdenton.com

emma.hand@snrdenton.com

keith.nusbaum@snrdenton.com

*Attorneys for Ormet Primary Aluminum
Corporation*

Dated: February 22, 2011

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Columbus Southern Power Company and)	
Ohio Power Company, Individually and, if)	Case No. 11-351-EL-AIR
Their Proposed Merger is Approved, as a)	Case No. 11-352-EL-AIR
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Ohio Power Company, Individually and, if)	Case No. 11-356-EL-AAM
Their Proposed Merger is Approved, as a)	Case No. 11-358-EL-AAM
Merged Company (collectively AEP Ohio))	
for Approval to Change Accounting Methods)	

**MEMORANDUM IN SUPPORT OF MOTION TO INTERVENE OF
ORMET PRIMARY ALUMINUM CORPORATION**

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, 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 Commission's July 15, 2009 and September 15, 2009 orders in Case No. 09-119-EL-AEC ("Agreement"). This Agreement between Ormet and AEP Ohio provides, *inter alia*, that under certain circumstances Ormet will receive electricity at a rate discounted from AEP Ohio's standard tariff rates. Because the discount that Ormet may receive each year is capped under the Agreement and the Commission's orders, an increase in the AEP Ohio tariff rates may result in an increase in the rate Ormet pays for electricity. Therefore, Ormet's rates could be affected by the outcome of this proceeding.

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.
- (5) The extent to which the person's interest is represented by existing parties.²

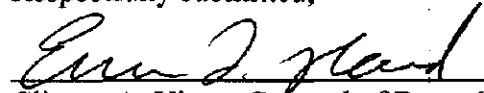
¹ Ohio Admin. Code § 4901-1-11(A)(2) (2011).

² Ohio Admin. Code § 4901-1-11(B) (2011).

As described above, Ormet is a customer of AEP Ohio and Ormet's rates may be affected by changes to AEP Ohio's tariff rates, thus Ormet has an interest in ensuring that AEP Ohio's rates remain just and reasonable. 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. Ormet's intervention is timely and will not unduly prolong or delay the proceedings.

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

Respectfully submitted,



Clinton A. Vince, Counsel of Record

Douglas G. Bonner

Emma F. Hand

Daniel D. Barnowski

Keith C. Nusbaum (#0082745)

SNR Denton US LLP

1301 K Street NW

Suite 600, East Tower

Washington, DC 20005

202.408.8004 Telephone

202.408.6399 Facsimile

clinton.vince@snrdenton.com

doug.bonner@snrdenton.com

dan.barnowski@snrdenton.com

emma.hand@snrdenton.com

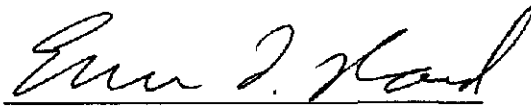
keith.nusbaum@snrdenton.com

*Attorneys for Ormet Primary Aluminum
Corporation*

Dated: February 22, 2011

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 22nd day of February, 2011.



Emma F. Hand

SERVICE LIST

Columbus Southern Power Company
Ohio Power Company
Selwyn J. R. Dias
850 Tech Center Drive
Gahanna OH 43230

Steven T. Nourse, Trial Attorney
Marvin I. Resnik
Matthew J. Satterwhite
American Electric Power Company
1 Riverside Plaza, 29th Floor
Columbus OH 43215

The Ohio Hospital Association
Richard L. Sites
155 East Broad Street, 15th Floor
Columbus OH 43215-3620

The Ohio Hospital Association
Thomas J. O'Brien
Bricker & Eckler LLP
100 South Third Street
Columbus OH 43215-4291

Industrial Energy Users-Ohio
Samuel C. Randazzo
Joseph E. Olikar
Frank P. Darr
McNees Wallace & Nurick LLC
21 East State Street, 17th Floor
Columbus OH 43215

The Office of the Ohio Consumers' Counsel
Maureen R. Grady
Michael I. Idzkowski
Richard C. Reese
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus OH 43215-3485

The Ohio Energy Group
David F. Boehm
Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati OH 45202

Ohio Partners for Affordable Energy
Colleen L. Mooney
231 West Lima Street
Findlay OH 45839-1793

The Natural Resources Defense Council
Henry W. Eckhart
50 West Broad Street #2117
Columbus OH 43215

FirstEnergy Solutions Corp.
Mark A. Hayden
FirstEnergy Service Company
76 South Main Street
Akron OH 44308

FirstEnergy Solutions Corp.
James F. Lang
Laura C. McBride
N. Trevor Alexander
Calfee, Halter & Griswold LLP
1400 KeyBank Center
800 Superior Ave.
Cleveland OH 44114