

April 22, 2011

BY FACSIMILE & FEDERAL EXPRESSPublic Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, Ohio 43215-3793
Fax: (614).466.0313

PUCO

2011 APR 25 AM 9:42

RECEIVED-DOCKETING DIV

Re: *In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan, Case Nos. 11-346-EL-SSO, 11-348-EL-SSO;*

In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority, Case Nos. 11-349-EL-AAM, 11-350-EL-AAM;

Dear Sir or Madam:

Enclosed please find an original and ten (10) copies of each of the following filings which were originally filed by facsimile on April 22, 2011:

- (i) *Motion for Permission to Appear Pro Hac Vice of Douglas G. Bonner;*
- (ii) *Motion for Permission to Appear Pro Hac Vice of Emma Hand;*
- (iii) *Motion of Ormet Primary Aluminum Corporation for Leave to Intervene Out of Time; and*
- (iv) *Motion to Consolidate of Ormet Primary Aluminum Corporation*

Two additional copies of each document are enclosed to be date-stamped and returned to me in the enclosed, self-addressed Federal Express envelope.

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.

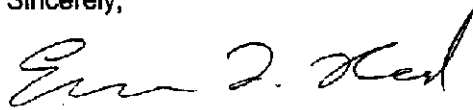
Technician Am Date Processed APR 25 2011

April 22, 2011

Page 2

Thank you for your assistance in this matter. If you have any questions please contact me at the telephone number above.

Sincerely,

A handwritten signature in black ink, appearing to read "Emma F. Hand". The signature is fluid and cursive, with the first name "Emma" being more prominent than the last name "Hand".

Emma F. Hand
Partner

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

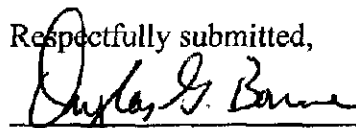
**In the Matter of the Application of
Columbus Southern Power Company
and Ohio Power Company for Authority
to Establish a Standard Service Offer
Pursuant to Section 4928.143, Revised
Code, in the Form of an Electric
Security Plan.**

Case No. 11-348-EL-SSO

**MOTION FOR PERMISSION TO APPEAR *PRO HAC VICE*
OF DOUGLAS G. BONNER**

Pursuant to Gov.Bar R. XII Section 2(A)(6), Douglas G. Bonner, attorney for Ormet Primary Aluminum Corporation ("Ormet"), hereby moves the Public Utilities Commission of Ohio to grant him permission to appear *pro hac vice* and participate as counsel in the above proceeding for Ormet, an industrial customer of Columbus Southern Power Company and Ohio Power Company, for the reasons contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,



Douglas G. Bonner (PHV - 1363-2011)
SNR Denton US LLP
1301 K Street, NW
Suite 600, East Tower
Washington, DC 20005-3364
202-408-3957 phone
202-408-6399 fax
doug.bonner@snrdenton.com

*Counsel for Ormet Primary Aluminum
Corporation*

Dated: April 22, 2011

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of
Columbus Southern Power Company
and Ohio Power Company for Authority
to Establish a Standard Service Offer
Pursuant to Section 4928.143, Revised
Code, in the Form of an Electric
Security Plan.**

Case No. 11-348-EL-SSO

**MEMORANDUM IN SUPPORT OF
MOTION FOR PERMISSION TO APPEAR *PRO HAC VICE*
OF DOUGLAS G. BONNER**

Pursuant to Gov.Bar R. XII Section 2(A)(6), Douglas G. Bonner, attorney for Ormet Primary Aluminum Corporation ("Ormet"), hereby moves the Public Utilities Commission of Ohio to grant him permission to appear *pro hac vice* and participate as counsel in the above proceeding for Ormet, an industrial customer of Columbus Southern Power Company and Ohio Power Company.

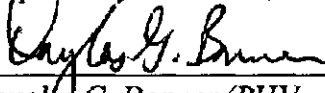
Movant represents that the following is a list of the jurisdictions in which he has ever been licensed to practice law, including dates of admission to practice, resignation, or retirement, and any attorney registration numbers: Florida (#376825; admission date: 11/04/1983); District of Columbia (#384060; admission date: 11/21/1984).

Movant represents that he has not been granted permission to appear *pro hac vice* in more than three proceedings before Ohio tribunals in the current calendar year pursuant to Gov.Bar R. XII Section 2(A)(5).

Keith C. Nusbaum (#0082745), an active Ohio attorney in good standing, has agreed to associate with Movant on this matter.

The affidavit required by Gov.Bar R. XII Section 2(A)(6), a copy of Movant's certificate of *pro hac vice* registration furnished by the Supreme Court of Ohio Office of Attorney Services, and a certificate indicating service of this Motion on all known parties and attorneys of record are attached. Movant understands that, if this Motion is granted, Movant must file a *Notice of Permission to Appear Pro Hac Vice* and a copy of the Order granting permission with the Supreme Court of Ohio Office of Attorney Services within thirty days of the Order.

Respectfully submitted,


Douglas G. Bonner (PHV - 1363-2011)

SNR Denton US LLP
1301 K Street, NW
Suite 600, East Tower
Washington, DC 20005-3364
202-408-3957 phone
202-408-6399 fax
doug.bonner@snrdenton.com

Dated: April 22, 2011

THE SUPREME COURT of OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

DOUGLAS G. BONNER

FOR PRO HAC VICE REGISTRATION

AFFIDAVIT OF APPLICANT

Gov. Bar R. XII, Section 2(A)(3)

State of DISTRICT OF COLUMBIA)

County of DISTRICT OF COLUMBIA)

ss:

Douglas G. Bonner, being first duly cautioned, swears or affirms as follows:

a. I have never been disbarred from the practice of law.

b. I have been admitted to the practice of law in the following jurisdiction(s)
Florida; District of Columbia

c. Choose one:

☒ I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice.

☐ I am currently suspended from the practice of law in the following jurisdiction(s):

d. Choose one:

☒ I have not resigned from the practice of law with discipline pending in any jurisdiction where I have been admitted to practice.

☐ I have resigned from the practice of law with discipline pending in the following jurisdiction(s):

SIGNATURE OF APPLICANT:

Douglas G. Bonner

Sworn to or affirmed before me and subscribed in my presence the 29th

day of March, 2011

Lynn L. Bellay
LYNN L. BELLAY NOTARY PUBLIC

NOTARY PUBLIC
DISTRICT OF COLUMBIA

MY COMMISSION EXPIRES FEB. 28, 2015

THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Douglas Bonner

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Certificate of
PRO HAC VICE
REGISTRATION

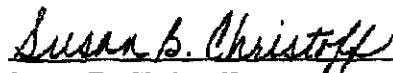
2011

Registration Number:

PHV- 1363-2011

Douglas Bonner, having met the requirements of, and found to be in full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.




Susan B. Christoff
Director, Attorney Services

Expires December 31, 2011

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion for Permission to Appear Pro Hac Vice* and *Memorandum in Support* were served by U.S. Mail and electronic mail upon counsel identified below for all parties of record this 22nd day of April, 2011.


Emma F. Hand

SERVICE LIST

City of Hilliard, Ohio
Christopher L. Miller
Pamela A. Fox
Gregory H. Dunn
Asim Z. Haque
Schottenstein Zox & Dunn Co., LPA
250 West Street
Columbus, OH 43215

Wal-Mart Stores East, LP
Sam's East, Inc.
Kenneth Kreider
Keating Muething & Klekamp PLL
One East Fourth Street
Suite 1400
Cincinnati, OH 45202

Appalachian Peace and Justice Network
Michael R. Smalz
Joseph v. Maskovyak
Ohio Poverty Law Center
555 Buttles Avenue
Columbus, OH 43215

Wal-Mart Stores East, LP
Sam's East, Inc.
Holly Rachel Smith, PLLC
Hitt Business Center
3803 Rectortown Road
Marshall, VA 20115

Sierra Club
Natural Resources Defense Counsel
Henry W. Eckhart
Shannon Fisk
1200 Chambers Road, Ste. 106
Columbus, OH 43212

Wal-Mart Stores East, LP
Sam's East, Inc.
Steve W. Chriss
Wal-Mart Stores, Inc.
2001 SE 10th Street
Bentonville, AR 721716

American Electric Power Service
Corporation
Jay E. Jadwin
1 Riverside Plaza, 29th Floor
Columbus, OH 43215

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

Columbus Southern Power Company
& Ohio Power Company
Steven T. Nourse
Matthew J. Satterwhite
American Electric Power
1 Riverside Plaza, 29th Floor
Columbus, OH 43215

Exelon Generation Company, LLC
Jesse A. Rodriguez
300 Exelon Way
Kennett Square, PA 19348

Columbus Southern Power Company
& Ohio Power Company
Daniel R. Conway
Porter Wright Morris & Arthur
Huntington Center
41 S. High Street
Columbus, OH 43215

Exelon Generation Company, LLC
Constance Whyte Reinhard
Exelon Business Services Company
10 S. Dearborn Street
Chicago, IL 60603

Environmental Law & Policy Center
Tara C. Santarelli
1207 Grandview Ave., Ste. 201
Columbus, OH 43212
tsantarelli@elpc.com

Exelon Generation Company, LLC
Sandy I. Grace
Exelon Business Services Company
101 Constitution Avenue, N.W.
Suite 400 East
Washington, DC 20001

OMA Energy Group
Lisa G. McAlister
Matthew W. Warnock
Bricker & Eckler, LLP
100 South Third Street
Columbus, OH 43215-4291

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

Ohio Environmental Council
E. Camille Yancey
Nolan Moser
Trent A. Dougherty
1207 Grandview Ave., Ste 201
Columbus, OH 43212

Distributed Wind Energy Association
Terrence O'Donnell
Christopher Montgomery
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215

Retail Energy Supply Association
Stephen Howard
M. Howard Petricoff
Vorys, Sater, Seymour and Pease LLP
52 E. Gay Street
P.O. Box 1008
Columbus, OH 43216
mhpetricoff@vorys.com

Ohio Partners for Affordable Energy
Colleen Mooney
231 West Lima Street
Findlay, OH 45840

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

Association of Independent Colleges
& Universities of Ohio
Christopher L. Miller
C. Todd Jones
Gregory H. Dunn
Asim Z. Haque
Schottenstein, Zox and Dunn Co LPA
250 West Street
Columbus, OH 43215

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

COMPETE Coalition
William L. Massey
Covington & Burling LLP
1201 Pennsylvania Ave., NW
Washington, DC 20004

Constellation New Energy, Inc. &
Constellation Energy Commodities
Group, Inc.
M. Howard Petricoff
Michael J. Settineri
Vorys Sater Seymour and Pease LLP
52 East Gay Street
P.O. Box 1008
Columbus, OH 43216-1008
mhpeticoff@vorys.com

COMPETE Coalition
M. Howard Petricoff
Michael J. Settineri
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
P.O. Box 1008
Columbus, OH 43216-1008
mhpeticoff@vorys.com

Dominion Retail Inc.
Gary A. Jeffries
501 Martindale Street
Ste. 400
Pittsburgh, PA 15212

Dominion Retail, Inc.
Barth E. Royer
Bell & Royer Co LPA
33 South Grant Avenue
Columbus, OH 43215-3927

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

Duke Energy Retail Services, LLC
Amy B. Spiller
Dorothy K. Corbett
139 E Forth Street
1303-Main
Cincinnati, OH 45202

FirstEnergy Solutions Corp.
Mark A. Hayden
FirstEnergy Service Company
76 South Main Street
Akron, OH 44308
haydenm.@firstenergycorp.com

Paulding Wind Farm II LLC
Terrence O'Donnell
Christopher Montgomery
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215

The Kroger Co.
John W. Bentine
Mark Yurick
Chester Wilcox & Saxbe LLP
65 E State Street
Suite 1000
Columbus, OH 43215
myurick@cwslaw.com

The PJM Power Providers Group
Glen Thomas
1060 First Avenue, Ste. 400
King of Prussia, PA 19406

City of Grove City, Ohio
Gregory H. Dunn
Stephen J. Smith
Christopher L. Miller
Asim Z. Haque
Schottenstein Zox & Dunn Co., LPA
250 West Street
Columbus, OH 43215

The PJM Power Providers Group
Laura Chapelle
4218 Jacob Meadows
Okemos, MI 48864

Office of the Ohio Consumers' Counsel
Terry L. Etter
Michael E. Idzkowski
Maureen R. Grady
10 W Broad Street
Suite 1800
Columbus, OH 43215

The PJM Power Providers Group
Stephen M. Howard, Attorney
M. Howard Petricoff
52 East Gay Street
P.O. Box 1008
Columbus, OH 43216
mhpeticoff@vorys.com