

April 22, 2011

**BY FACSIMILE & FEDERAL EXPRESS**

Public 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:

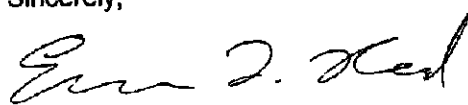
- (i) *Motion for Permission to Appear Pro Hac Vice of Douglas G. Bonner;*
- (ii) *Motion for Permission to Appear Pro Hac Vice of Emma Hand;*
- (iii) *Motion of Ormet Primary Aluminum Corporation for Leave to Intervene Out of Time; and*
- (iv) *Motion to Consolidate of Ormet Primary Aluminum Corporation*

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

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" written in a larger, more prominent script 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.**

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) **Case No. 11-346-EL-SSO**  
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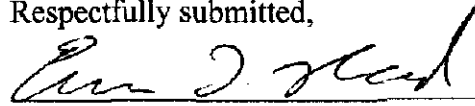
**MOTION TO CONSOLIDATE OF  
ORMET PRIMARY ALUMINUM CORPORATION**

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Ormet Primary Aluminum Corporation ("Ormet") hereby respectfully moves the Public Utilities Commission of Ohio to formally consolidate the above four proceedings under one case number. Formal consolidation under one case number would permit Ormet's *pro hac vice* counsel to represent the Company in all four proceedings without contravening Gov.Bar R.XII, which provides that each *pro hac vice* attorney may appear in no more than three Ohio dockets per calendar year.

The reasons for granting this motion are contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,



Douglas G. Bonner (PHV - 1363-2011)

Emma F. Hand (PHV - 1353-2011)

Keith C. Nusbaum (#0082745)

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*Attorneys 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  
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to Establish a Standard Service Offer  
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**In the Matter of the Application of  
Columbus Southern Power Company  
and Ohio Power Company for Approval  
of Certain Accounting Authority.**

)  
) **Case No. 11-349-EL-AAM**  
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**MEMORANDUM IN SUPPORT OF MOTION TO CONSOLIDATE OF  
ORMET PRIMARY ALUMINUM CORPORATION**

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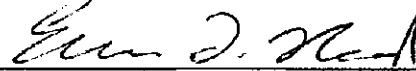
Ormet Primary Aluminum Corporation ("Ormet") requests that the Public Utilities Commission of Ohio ("Commission") formally consolidate the above four proceedings under one case number to permit Ormet's *pro hac vice* counsel to participate in all four proceedings while still remaining compliant with the Supreme Court of Ohio's revised rules for *pro hac vice* admission that became effective on January 1, 2011.

Specifically, Gov.Bar R.XII Section 2(A)(5) of the revised rules states: "An attorney may participate *pro hac vice* in no more than three proceedings under this rule in the same calendar year the application is filed." While Ormet understands that the Commission is already treating the four proceedings related to the Electric Security Plan of Columbus Southern Power Company and Ohio Power Company (collectively, "AEP Ohio") as one case, the Supreme Court will not recognize the four dockets as one consolidated docket without a formal consolidation

order by the Commission. Without formal consolidation, no single *pro hac vice* attorney can be admitted to all four dockets. A formal order of consolidation will not delay these proceedings or harm any party to these proceedings.

WHEREFORE, Ormet respectfully requests that the Commission grant its motion to consolidate these proceedings.

Respectfully submitted,



Douglas G. Bonner (PHV - 1363-2011)

Emma F. Hand (PHV - 1353-2011)

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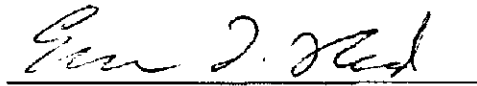
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*Attorneys for Ormet Primary Aluminum  
Corporation*

Dated: April 22, 2011

## CERTIFICATE OF SERVICE

I hereby certify that a copy of Ormet Primary Aluminum Corporation's *Motion to Consolidate 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

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