

May 19, 2011

BY FEDERAL EXPRESS

Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, Ohio 43215-3793
Fax: (614).466.0313

PUCO

2011 MAY 20 AM 10:21

RECEIVED-DOCKETING DIV

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 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;

Dear Sir or Madam:

Enclosed please find an original and twenty (20) copies of each of the following filings:

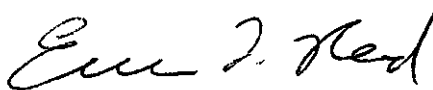
- (i) *Revised Motion for Permission to Appear Pro Hac Vice of Emma F. Hand and Memorandum in Support in Case No. 11-351-EL-AIR;*
- (ii) *Revised Motion for Permission to Appear Pro Hac Vice of Douglas G. Bonner and Memorandum in Support in Case No. 11-352-EL-AIR;*
- (iii) *Revised Motion for Permission to Appear Pro Hac Vice of Emma F. Hand and Memorandum in Support in Case No. 11-346-EL-SSO; and*
- ✓ (iv) *Revised Motion for Permission to Appear Pro Hac Vice of Douglas G. Bonner and Memorandum in Support in Case No. 11-348-EL-SSO.*

These documents are intended to replace documents originally filed by facsimile on April 19 and 22, 2011, respectively, and placed on the dockets on April 20, and April 25, 2011, respectively. 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 SM Date Processed MAY 20 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 cursive script, appearing to read "Emma F. 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

**REVISED 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. The attached *Memorandum* has been corrected to include Mr. Bonner's residential address. This *Revised Motion* and attached *Memorandum* replace the original *Motion* and *Memorandum* filed on April 22, 2011 (by facsimile) and April 25, 2011 (by hard copy).

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: May 19, 2011

**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.**

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

6620 Fernwood Court
Bethesda, MD 20817

Dated: May 19, 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 19th

day of May, 20 11.

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)

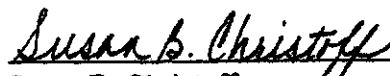
Certificate of
PRO HAC VICE
REGISTRATION

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.

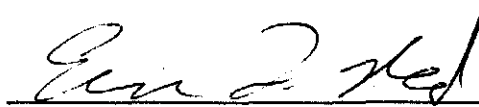


Susan B. Christoff
Director, Attorney Services

Expires December 31, 2011

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Revised 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 19th day of May, 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
pfox@hilliardohio.gov
cmiller@szd.com
gdunn@szd.com
ahaque@szd.com

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

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

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

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

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

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

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

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

Industrial Energy Users-Ohio
Samuel C. Randazzo
Joseph E. Olier
Frank P. Darr
McNees Wallace & Nurick LLC
21 East State Street, 17th Fl
Columbus, OH 43215
sam@mwncmh.com
fdarr@mwncmh.com
joliker@mwncmh.com

Exelon Generation Company, LLC
Jesse A. Rodriguez
300 Exelon Way
Kennett Square, PA 19348
Jesse.rodriguez@exeloncorp.com

Exelon Generation Company, LLC
M. Howard Petricoff,
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008
mhpetricoff@vorys.com

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

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

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

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

Ohio Environmental Council
E. Camille Yancey
Nolan Moser
Trent A. Dougherty
1207 Grandview Ave., Ste 201
Columbus, OH 43212
camille@theoec.org
nolan@theoec.org
trent@theoec.org

Distributed Wind Energy Association
Terrence O'Donnell
Christopher Montgomery
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215
cmontgomery@bricker.com
todonnell@bricker.com

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
mhpeticoff@vorys.com
smhoward@vorys.com

Ohio Partners for Affordable Energy
Colleen Mooney
231 West Lima Street
Findlay, OH 45840
cmooney2@columbus.rr.com

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

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
cmiller@szd.com
gdunn@szd.com
ahaque@szd.com

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

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

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
mhpetricoff@vorys.com
mjsettineri@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
mhpetricoff@vorys.com
mjsettineri@vorys.com

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

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

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
jlang@calfee.com
lmcbride@calfee.com
talexander@calfee.com

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

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

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

Duke Energy Retail Services, LLC
Amy B. Spiller
Dorothy K. Corbett
139 E Forth Street
1303-Main
Cincinnati, OH 45202
Amy.spiller@duke-energy.com
Dorothy.corbett@duke-energy.com

FirstEnergy Solutions Corp.
Norkhairani Baharuddin
341 White Pond Drive, A-WAC-B2
Akron, OH 44320

The Kroger Co.
Denis George
1014 Vine Street
GO7
Cincinnati, OH 45202

Paulding Wind Farm II LLC
Terrence O'Donnell
Christopher Montgomery
Bricker & Eckler LLP
100 South Third Street
Columbus, OH 43215
cmontgomery@bricker.com
todonnell@bricker.com

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
cmiller@szd.com
gdunn@szd.com
ahaque@szd.com

Office of the Ohio Consumers' Counsel
Terry L. Etter
Michael E. Idzkowski
Maureen R. Grady
10 W Broad Street
Suite 1800
Columbus, OH 43215
grady@occ.state.oh.us
etter@occ.state.oh.us
idzkowski@occ.state.oh.us

The PJM Power Providers Group
Laura Chapelle
4218 Jacob Meadows
Okemos, MI 48864
laurac@chappelleconsulting.net

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