

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of )  
Columbus Southern Power Company )  
and Ohio Power Company to Adjust )  
Their Economic Development Cost )  
Recovery Rider Rates. )

Case No. 11-4570-EL-RDR

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**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT  
OF ERAMET MARIETTA, INC.**

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Samuel C. Randazzo  
Frank P. Darr (Counsel of Record)  
Joseph E. Olier  
MCNEES WALLACE & NURICK LLC  
21 East State Street, 17<sup>th</sup> Floor  
Columbus, OH 43215-4228  
Telephone: (614) 469-8000  
Telecopier: (614) 469-4653  
sam@mwncmh.com  
fdarr@mwncmh.com  
joliker@mwncmh.com

August 2, 2011

Attorneys for Eramet Marietta, Inc.

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**MOTION TO INTERVENE**

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Eramet Marietta, Inc. ("Eramet") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code ("O.A.C."), for leave to intervene in the above-captioned matter with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the O.A.C., to intervening parties.

On August 1, 2011, Columbus Southern Power Company ("CSP") filed an Application to adjust its economic development cost recovery rider ("Rider EDR"), which included Eramet-specific information filed under seal.

As demonstrated further in the Memorandum in Support, attached hereto and incorporated herein, Eramet has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding, and is so situated that the disposition of these proceedings may, as a practical matter, impair or impede its ability to protect that interest. Eramet believes that its participation will not unduly prolong or delay this proceeding and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in this proceeding. The interests of Eramet will not be adequately represented by other parties to the proceeding and, as

such, Eramet is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the O.A.C., to intervening parties.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'S. C. Randazzo', is written over a horizontal line.

Samuel C. Randazzo  
Frank P. Darr (Counsel of Record)  
Joseph E. Olikar  
MCNEES WALLACE & NURICK LLC  
21 East State Street, 17<sup>th</sup> Floor  
Columbus, OH 43215-4228  
Telephone: (614) 469-8000  
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sam@mwncmh.com  
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**MEMORANDUM IN SUPPORT**

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In support of this Motion to Intervene, Eramet states that it is a mercantile customer currently taking service from CSP pursuant to a Commission-approved reasonable arrangement. As a result, the economic development amounts that CSP seeks to recover through its EDR, which it is updating through its filing, are generated by Eramet's reasonable arrangement, among others.

Given that Eramet's customer-specific information is being used by CSP to support its requested EDR update, Eramet may be affected by CSP's proposed changes to its Rider EDR rates. This potential vests Eramet with a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding, the disposition of which may impair or impede its ability to protect that interest.

For the aforementioned reasons, Eramet has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding that will only be protected by its participation in this proceeding. Therefore, Eramet hereby requests that the Commission grant its intervention with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the O.A.C., to intervening parties.

Respectfully submitted,



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Samuel C. Randazzo

Frank P. Darr

Joseph E. Olier

MCNEES WALLACE & NURICK LLC

21 East State Street, 17<sup>th</sup> Floor

Columbus, OH 43215-4228

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

sam@mwncmh.com

fdarr@mwncmh.com

joliker@mwncmh.com

**Attorneys for Eramet Marietta, Inc.**

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support of Eramet Marietta, Inc.* was served upon the following parties of record this 2<sup>nd</sup> Day of August 2011, via first class mail, postage prepaid.



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FRANK P. DARR

Steven T. Nourse  
American Electric Power Service Company  
1 Riverside Plaza, 29<sup>th</sup> Floor  
Columbus, OH 43215  
stnourse@aep.com

**ON BEHALF OF COLUMBUS SOUTHERN  
POWER AND OHIO POWER COMPANY**