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March 13, 2012

### BY FACSIMILE & FEDERAL EXPRESS

Case Nos. 11-4920-EL-RDR 11-4921-EL-RDR

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

RECEIVED-DOCKETING DIV 2012 MAR 14 AM 11: 06 PUCC

Re: In the Matter of the Application of Columbus Southern Power Company for Approval of a Mechanism to Recover Deferred Fuel Costs Ordered Under Section 4928.144, Ohio Revised Code. Case Nos. 11-4920-EL-RDR and 11-4921-EL-RDR

Dear Sir or Madam:

Enclosed please find for filing an original and twenty (20) copies of the *Motion to Intervene by* Ormet Primary Aluminum Corporation, Motion for Permission to Appear Pro Hac Vice for Dan Barnowski and Motion for Permission to Appear Pro Hac Vice for Emma F. Hand. These submittals were orginally filed by fax on March 13, 2012.

Two additional copies are enclosed to be date-stamped and returned to me in the enclosed, selfaddressed Federal Express envelope.

Sincerely,

9. 2. Ken

Emma F. Hand Partner

## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Columbus Southern Power Company for Approval of a Mechanism to Recover Deferred Fuel Costs Ordered Under Section 4928.144, Ohio Revised Code.

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Case No. 11-4920-EL-RDR

## MOTION FOR PERMISSION TO APPEAR PRO HAC VICE OF EMMA F. HAND

Pursuant to Gov.Bar R. XII Section 2(A)(6), Emma F. Hand, attorney for Ormet Primary Aluminum Corporation ("Ormet"), hereby moves the Public Utilities Commission of Ohio to grant her 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 in Support attached hereto and incorporated herein.

Respectfully submitted,

En J. No.

Emma F. Hand (PHV-1353-2012)

Business Address: SNR Denton US LLP 1301 K Street, NW Suite 600, East Tower Washington, DC 20005 Tel: 202-408-6400 Fax: 202-408-6399 emma.hand@snrdenton.com

## **Residential Address:**

7205 Sewell Ave. Falls Church, VA 22046

Attorney for Ormet Primary Aluminum Corporation

March 13, 2012

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## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of	
Columbus Southern Power Company	
for Approval of a Mechanism to	
<b>Recover Deferred Fuel Costs Ordered</b>	
Under Section 4928.144, Ohio Revised	
Code.	

Case No. 11-4920-EL-RDR

## MEMORANDUM IN SUPPORT OF MOTION FOR PERMISSION TO APPEAR *PRO HAC VICE* OF EMMA F. HAND

Pursuant to Gov.Bar R. XII Section 2(A)(6), Emma F. Hand, attorney for Ormet Primary Aluminum Corporation ("Ormet"), hereby moves the Public Utilities Commission of Ohio ("PUCO") to grant her 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 she has ever been licensed to practice law, including dates of admission to practice, resignation, or retirement, and any attorney registration numbers: Virginia (#46272; admission date: 2001); and District of Columbia (#4760001; admission date: 01/11/2002).

Movant represents that she 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).

Art Beeman (#0032948; admission date 11/23/1982), an active Ohio attorney in good standing, has agreed to associate with Movant on this matter.

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The affidavit required by Gov.Bar R. XII Section 2(A)(6) (Exhibit A), a copy of Movant's certificate of *pro hac vice* registration furnished by the Supreme Court of Ohio Office of Attorney Services (Exhibit B), 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,

En J. New

Emma F. Hand (PHV-1353-2012) SNR Denton US LLP 1301 K Street, NW Suite 600, East Tower Washington, DC 20005 Tel: 202-408-6400 Fax: 202-408-6399 emma.hand@snrdenton.com

Attorney for Ormet Primary Aluminum Corporation

March 13, 2012

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the instant *Motion For Permission to Appear* Pro Hac Vice *of Emma F. Hand* was served by U.S. Mail and email upon counsel identified below for all parties of record this 13<sup>th</sup> day of March, 2012.

En 2. Net

Emma F. Hand (PHV-1353-2012)

#### SERVICE LIST

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

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# Exhibit A

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## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of	
Columbus Southern Power Company	
for Approval of a Mechanism to	
<b>Recover Deferred Fuel Costs Ordered</b>	
Under Section 4928.144, Ohio Revised	
Code.	

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Case No. 11-4920-EL-RDR

## AFFIDAVIT IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE OF EMMA F. HAND

Emma F. Hand, states as follows:

I have never been disbarred, I am not currently under suspension from any bar, nor have I ever resigned with discipline pending in any jurisdiction.

Emma F. Hand (PHV-1353-2012) SNR Denton US LLP 1301 K Street, NW Suite 600, East Tower Washington, DC 20005 Tel: 202-408-6400 Fax: 202-408-6399 emma.hand@snrdenton.com

Sworn to and subscribed Before me This  $i\lambda$  day of March, 2012

Notary Public,

My Commission Expires:

LYNN L. BELLAYR NOTARY PUBLIC DISTRICT OF COLUMBIA MY COMMISSION EXPIRES FEB. 28, 2015

# **Exhibit B**

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THE SUPREME COURT of OHIO

**OFFICE OF ATTORNEY SERVICES** 

IN THE MATTER OF THE APPLICATION OF

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**Emma Hand** 

FOR PRO HAC VICE REGISTRATION

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

Certificate of PRO HAC VICE REGISTRATION 2012

Registration Number: PHV- 1353-2012

Emma Hand \_\_\_\_\_\_, 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.

usan b. Christoff

Susan B. Christoff Director, Attorney Services

Expires December 31, 2012