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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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RECEIVED-DOCKETING DIV

In the Matter of the Application of)	
Columbus Southern Power Company and)	
Ohio Power Company for Authority to)	Case No. 11-346-EL-SSO
Establish a Standard Service Offer)	Case No. 11-348-EL-SSO
Pursuant to §4928.143, Ohio Rev. Code,)	
in the Form of an Electric Security Plan.)	
In the Matter of the Application of)	
Columbus Southern Power Company and)	Case No. 11-349-EL-AAM
Ohio Power Company for Approval of)	Case No. 11-350-EL-AAM
Certain Accounting Authority)	

OHIO POWER COMPANY'S MOTION TO STRIKE
FIRSTENERGY SOLUTION'S IMPROPER REPLY MEMORANDUM
TO OHIO POWER'S MEMORANDUM CONTRA TESTIMONY
OF OHIO POWER WITNESS RENEE HAWKINS

Pursuant to Rules 4901-1-12 and 4901-1-27(B)(7)(a) and (b), Ohio Administrative Code,
Ohio Power Company ("Ohio Power" or the "Company") moves to strike the Reply
Memorandum filed by FirstEnergy Solutions (FES) in reply to Ohio Power's Memorandum
Contra a Motion to Strike Testimony of Renee Hawkins.

The support for the motion is attached in the memorandum in support, but in short the
Examiners already ruled that no Reply Memorandum should be filed to Memorandum Contra
Motions to Strike Testimony on both April 26, 2012 and May 3, 2012. This filing violates the

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Examiners' entries and therefore the Reply Memorandum should be stricken as an improper filing in violation of the Examiners' orders.

Respectfully submitted,

/s/ Matthew J. Satterwhite

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Counsel for Ohio Power Company

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MEMORANDUM IN SUPPORT

On May 14, 2012, FES improperly filed a Reply Memorandum in support of its Motion to Strike portions of the testimony of Company witness Renee Hawkins. The Examiners in this case released two different Entries in the case outlining the procedural schedule for motions to strike and declared that reply memorandum in support of motions to strike would not be allowed. FES still filed such a memorandum.

On April 26, 2012 and May 3, 2012, the Examiners in this case issued Entries declaring the process for motions to strike in these proceedings. In both entries the process allowed for motions to strike and memorandum contra to any motions filed. Each entry also explicitly denied the right for any reply memorandum in support of motions to strike. Specifically, the April 26th Entry at ¶6 and ¶4(e) of the May 3rd Entry stated, "Further, no replies to memoranda contra will be permitted."

Ohio Power notified FES of the error upon receiving the service of the document. Counsel for Ohio Power removed the Examiners from the email distribution list and pointed out

the procedural error in filing and asked if FES intended to withdraw the improper filing. As of the filing of this motion to strike, Ohio Power has not heard from FES in response to its attempt to allow FES to withdraw the improper filing before filing this motion. There is nothing in the FES memorandum that seeks any special leave for the filing of the testimony and even if there were it would be improper and open the floodgates in this case for more filings by all the parties involved in the motions concerning the striking of testimony. Therefore, Ohio Power is filing this motion out of caution and to avoid any further undue prejudice by the arguments improperly raised in the motion.

For the reasons set forth above, Ohio Power Company respectfully requests that the Commission strike FES' Reply Memorandum in Support of its Motion to Strike Testimony of Renee Hawkins as an improper filing in violation of the Examiners' Entries

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of Ohio Power Company's Motion to Strike FES' Reply Memorandum was served by E-mail upon counsel for all parties of record in this case on this 14th day of May, 2012.

/s/ Matthew J. Satterwhite

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