

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>In the Matter of the Application</b>	)	
<b>for Approval of an Amendment to a</b>	)	
<b>Contract for Electric Service between</b>	)	<b>Case No. 13-1170-EL-AEC</b>
<b>Ohio Power Company and Globe</b>	)	
<b>Metallurgical, Inc.</b>	)	

**MOTION TO RE-SCHEDULE HEARING  
AND ESTABLISH A PREHEARING CONFERENCE**

Pursuant to Rules 4901-1-12 and 4901-1-14 of the Ohio Administrative Code, Globe Metallurgical, Inc. ("Globe") respectfully moves for a procedural ruling to expedite the hearing date in this matter to July 17, 2013 and to seek scheduling of a prehearing conference prior to that hearing date. Globe states that the time for timely intervention has passed. There is only one intervenor in this matter, Ohio Power, and that the intervenor has no objection to expediting the hearing date. As more fully described in the attached memorandum in support, good cause exists for rescheduling the hearing and establishing a prehearing conference date in order to expedite this matter.

WHEREFORE, Globe Metallurgical, Inc. respectfully requests that a prehearing conference be scheduled for July 10, 2013 and that the hearing in this matter be rescheduled for July 17, 2013.

Respectfully submitted,

GLOBE METALLURGICAL, INC.



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## **MEMORANDUM IN SUPPORT**

On May 10, 2013, Globe filed an application for an approval of an amendment to its unique arrangement with Ohio Power Company (“AEP Ohio”). In its application, Globe proposed to move up the current contract termination date from December 31, 2018 to June 1, 2015, and to incorporate a fixed price as opposed to a percentage off AEP Ohio’s tariff rates. The application provided that Globe would remain an interruptible customer for AEP Ohio until the June 2015 billing cycle, or until AEP Ohio procures capacity for its standard service offer by auction, whichever is earlier. Globe indicated that the approval of its proposed amendment application would allow it to maintain its facilities and allow for the expansion of its work force by ten percent.

On May 30, 2013, AEP Ohio filed a motion to intervene. AEP Ohio raised no factual issues nor did it object to the proposed amendment. No other motions for intervention or comments have been filed and the date for a timely intervention has passed.

By Entry of June 19, 2013, the Attorney Examiner granted AEP Ohio’s motion to intervene and schedule the matter for hearing on August 6, 2013 at 10:00 a.m. at the Offices of the Commission. The hearing date is some three months after the date of filing and would unduly delay approval of the application necessary to conduct the job retention and expansion described in the Application. Further, at this time there are no outstanding factual issues to be resolved by a hearing.

The Application, if approved, would permit Globe to not only maintain its pledged payroll of fulltime employees, but expand the pledged work force by ten percent within six months from the first calendar month after the fixed price per MWh. That new higher level

would, upon approval, become the condition precedent for maintaining Globe's fixed price thereafter.

The deadline for filing objections to the proposed amendment has expired and no objections have been received. Given the fact that there are no factual issues, no objections to the proposed amendment, and that it would be appropriate to expand the pledged work force as soon as practical, Globe respectfully requests that the hearing in this matter be advanced and rescheduled for July 17, 2013 instead of August 6, 2013. A prehearing conference should also be scheduled in advance of the hearing date.

The undersigned, as counsel for Globe, represents that counsel for Ohio Power has been contacted and has indicated that Ohio Power has no objection to the scheduling of the hearing on July 17, 2013 and conducting a prehearing conference prior to that date.

Globe submits that good cause exists for expediting this hearing by establishing a July 10, 2013 prehearing conference and by re-scheduling the hearing in this matter for July 17, 2013.

WHEREFORE, Globe Metallurgical, Inc. respectfully requests that a prehearing conference be scheduled for July 10, 2013 and that the hearing in this matter be rescheduled for July 17, 2013.

Respectfully submitted,

GLOBE METALLURGICAL, INC.



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## **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing document was served upon Steven T. Nourse,  
American Electric Power Service Corporation, 1 Riverside Plaza, 29<sup>th</sup> Floor, Columbus, OH  
43215, [stnourse@aep.com](mailto:stnourse@aep.com) via electronic mail this 1<sup>st</sup> day of July, 2013.



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M. Howard Petricoff

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**7/3/2013 12:05:14 PM**

**in**

**Case No(s). 13-1170-EL-AEC**

Summary: Motion Motion to Re-Schedule Hearing and Establish a Prehearing Conference electronically filed by M HOWARD PETRICOFF on behalf of Globe Metallurgical, Inc.