

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Power Company to Adjust)	Case No. 14-193-EL-RDR
The Economic Development Cost)	
Recovery Rider Rate)	

**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT
OF GLOBE METALLURGICAL, INC.**

Samuel C. Randazzo
Frank P. Darr (Counsel of Record)
Matthew R. Pritchard
MCNEES WALLACE & NURICK LLC
21 East State Street, 17th Floor
Columbus, OH 43215-4228
Telephone: (614) 469-8000
Telecopier: (614) 469-4653
sam@mwncmh.com
fdarr@mwncmh.com
mpritchard@mwncmh.com

February 4, 2014

Attorneys for Globe Metallurgical, Inc.

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Power Company to Adjust)	Case No. 14-193-EL-RDR
The Economic Development Cost)	
Recovery Rider Rate)	

MOTION TO INTERVENE

Globe Metallurgical, Inc. (“Globe”) 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 February 3, 2014, Ohio Power Company (“AEP-Ohio”) filed an application to adjust its Economic Development Cost Recovery Rider (“EDR”) rates, which included Globe-specific information filed under seal.

As demonstrated further in the Memorandum in Support, attached hereto and incorporated herein, Globe 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 this proceeding may, as a practical matter, impair or impede its ability to protect that interest. Globe 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

Globe will not be adequately represented by other parties to the proceeding and, as such, Globe 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,

/s/ Matthew R. Pritchard

Samuel C. Randazzo

Frank P. Darr (Counsel of Record)

Matthew R. Pritchard

MCNEES WALLACE & NURICK LLC

21 East State Street, 17th Floor

Columbus, OH 43215-4228

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

sam@mwncmh.com

fdarr@mwncmh.com

mpritchard@mwncmh.com

Attorneys for Globe Metallurgical, Inc.

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Power Company to Adjust)	Case No. 14-193-EL-RDR
The Economic Development Cost)	
Recovery Rider Rate)	

MEMORANDUM IN SUPPORT

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

Given that Globe's customer-specific information is being used by AEP-Ohio to support its requested EDR update, Globe may be affected by AEP-Ohio's proposed changes to its EDR rates. This potential vests Globe 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, Globe 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, Globe 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,

/s/ Matthew R. Pritchard

Samuel C. Randazzo

Frank P. Darr (Counsel of Record)

Matthew R. Pritchard

MCNEES WALLACE & NURICK LLC

21 East State Street, 17th Floor

Columbus, OH 43215-4228

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

sam@mwncmh.com

fdarr@mwncmh.com

mpritchard@mwncmh.com

Attorneys for Globe Metallurgical, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support of Globe Metallurgical, Inc.* was served upon the following parties of record this 4th day of February 2014, *via* electronic transmission, hand-delivery or first class mail, U.S. postage prepaid.

/s/ Matthew R. Pritchard
MATTHEW R. PRITCHARD

Steven T. Nourse
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
Telephone: (614) 716-1608
Facsimile: (614) 716-2950
stnourse@aep.com

ON BEHALF OF OHIO POWER COMPANY

William L. Wright
Assistant Attorney General
Chief, Public Utilities Section
180 E. Broad Street, 6th Floor
Columbus, Ohio 43215-3793
William.wright@puc.state.oh.us

ON BEHALF OF THE STAFF OF THE PUBLIC UTILITIES COMMISSION OF OHIO

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

2/4/2014 1:38:30 PM

in

Case No(s). 14-0193-EL-RDR

Summary: Motion to Intervene and Memorandum in Support of Globe Metallurgical, Inc.
electronically filed by Mr. Matthew R. Pritchard on behalf of Globe Metallurgical, Inc.