

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Ohio Power Company to Adjust The	)	Case No. 14-1329-EL-RDR
Economic Development Cost Recovery	)	
Rider Rate	)	

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

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**August 5, 2013**

**Attorneys for Globe Metallurgical, Inc.**

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**MOTION TO INTERVENE**

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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 August 1, 2014, Ohio Power Company ("AEP-Ohio") filed an Application to adjust its Economic Development Cost Recovery Rider ("EDR") rate, 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

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**MEMORANDUM IN SUPPORT**

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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 rate. 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

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## **CERTIFICATE OF SERVICE**

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Motion to Intervene of Globe Metallurgical, Inc.* was sent by, or on behalf of, the undersigned counsel for Globe Metallurgical, Inc. to the following parties of record this 5<sup>th</sup> day of August 2014, *via* electronic transmission.

/s/ Matthew R. Pritchard

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**ON BEHALF OF OHIO POWER COMPANY**

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

**Commission of Ohio Docketing Information System on**

**8/5/2014 2:34:41 PM**

**in**

**Case No(s). 14-1329-EL-RDR**

Summary: Motion to Intervene and Memorandum in Support of Globe Metallurgical, Inc.  
electronically filed by Mr. Frank P Darr on behalf of Globe Metallurgical, Inc.