



Legal Department

March 9, 2016

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Re: *In the Matter of the Application Seeking Approval of Ohio Power Company's Proposal to Enter into an Affiliate Power Purchase Agreement for Inclusion in the Power Purchase Agreement Rider, Case No. 14-1693-EL-RDR; In the Matter of the Application of Ohio Power Company for Approval of Certain Accounting Authority, Case No. 14-1694-EL-AAM*

Dear Attorney Examiners:

On February 16, 2016, Ohio Power Company (AEP Ohio) filed a motion to strike the "reply" brief filed by Noble Americas Energy Solutions (Noble). Whether Noble should have filed an initial brief (or whether it should have filed a statement reserving the right to file a reply) is beside the point – the reply brief filed by Noble constitutes improper sandbagging and does not properly reply to points made in initial briefs. This situation is aggravated by the fact that Noble's memorandum in opposition to the Company's motion to strike was also filed late and, indeed, Noble's participation in this case is based on untimely intervention to begin with. The Commission should disregard Noble's late filing based on its untimely intervention and strike its improper reply brief.

Thank you for your attention to this matter.

Respectfully Submitted,

//s/ Steven T. Nourse

cc: Parties of Record

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

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**in**

**Case No(s). 14-1693-EL-RDR, 14-1694-EL-AAM**

Summary: Correspondence to Attorney Examiners electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company