

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Ohio Power Company to Adjust	)	Case No. 19-232-EL-RDR
The Economic Development Cost	)	
Recovery Rider Rate	)	

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**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT  
OF ERAMET MARIETTA INC.**

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**Frank P. Darr** (Reg. No. 0025469)  
(Counsel of Record)  
**Matthew R. Pritchard** (Reg. No. 0088070)  
MCNEES WALLACE & NURICK LLC  
21 East State Street, 17<sup>TH</sup> Floor  
Columbus, OH 43215  
Telephone: (614) 469-8000  
Telecopier: (614) 469-4653  
fdarr@mwncmh.com  
(willing to accept service by e-mail)  
mpritchard@mwncmh.com  
(willing to accept service by e-mail)

**JANUARY 30, 2019**

**ATTORNEYS FOR ERAMET MARIETTA INC.**

**BEFORE  
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**MOTION TO INTERVENE OF  
ERAMET MARIETTA INC.**

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Eramet Marietta Inc. ("Eramet") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to R.C. 4903.221, 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 January 29, 2019, Ohio Power Company ("AEP-Ohio") filed an application to adjust its Economic Development Cost Recovery Rider ("EDR") rate. The application includes Eramet-specific information filed under seal.

As demonstrated further in the Memorandum in Support, Eramet 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. Eramet 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 Eramet will not be adequately represented by other parties to the proceeding and, as such, Eramet is entitled to intervene with the

full powers and rights granted by the Commission, specifically by statute and by the provisions of Commission rules to intervening parties.

Respectfully submitted,

/s/ Matthew R. Pritchard

**Frank P. Darr** (Reg. No. 0025469)

(Counsel of Record)

**Matthew R. Pritchard** (Reg. No. 0088070)

MCNEES WALLACE & NURICK LLC

21 East State Street, 17<sup>TH</sup> Floor

Columbus, OH 43215

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

fdarr@mwncmh.com

mpritchard@mwncmh.com

**Attorneys for Eramet Marietta Inc.**

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**MEMORANDUM IN SUPPORT**

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In support of this Motion to Intervene, Eramet 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 Eramet's reasonable arrangement, among others.

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

**Frank P. Darr** (Reg. No. 0025469)

(Counsel of Record)

**Matthew R. Pritchard** (Reg. No. 0088070)

21 East State Street, 17<sup>TH</sup> Floor

Columbus, OH 43215

Telephone: (614) 469-8000

Telecopier: (614) 469-4653

fdarr@mwncmh.com

mpritchard@mwncmh.com

**Attorneys for Eramet Marietta Inc.**

## **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 and Memorandum in Support of Eramet Marietta Inc.* was sent by, or on behalf of, the undersigned counsel for Eramet Marietta Inc., to the following parties of record on January 30, 2019, via electronic transmission.

/s/ Matthew R. Pritchard

Matthew R. Pritchard

**Steven T. Nourse** (Reg. No. 0046705)  
American Electric Power Service  
Corporation  
1 Riverside Plaza, 29<sup>th</sup> Floor  
Columbus, OH 43215  
stnourse@aep.com

### **COUNSEL FOR OHIO POWER COMPANY**

**William L. Wright** (Reg. No. 0018010)  
Chief, Public Utilities Section  
Assistant Attorney General  
Office of the Ohio Attorney General  
30 E. Broad St., 16th Floor  
Columbus, OH 43215  
william.wright@ohioattorneygeneral.gov

### **COUNSEL FOR THE STAFF OF THE PUBLIC UTILITIES COMMISSION OF OHIO**

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