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BEFORE THE
PUBLIC UTILITY COMMISSION OF OHIO

PUCO

In the Matter of the Application of Ormet Primary
Aluminum Corporation for Approval of a Unique
Arrangement with Ohio Power Company and
Columbus Southern Power Company)

Case No. 09-119-EL-AEC

MEMORANDUM CONTRA OF ORMET PRIMARY ALUMINUM CORPORATION

On February 17, 2009, Ormet Primary Aluminum Corporation ("Ormet") filed an application ("Application") with the Commission for approval of a unique arrangement with Ohio Power Company and Columbus Southern Power Company (collectively "AEP Ohio") that is intended to allow Ormet to remain solvent during periods when aluminum prices are low and to provide sufficient long-term predictability that Ormet can attract the necessary capital to keep its aluminum smelter in Hannibal, Ohio ("Hannibal Facilities") operating ("Unique Arrangement"). On March 13, 2009, the Office of Consumers Counsel ("OCC") filed a motion to intervene and a motion to shorten discovery response time. At the time that Ormet filed its initial memorandum contra the motions to intervene in this case, it had not been served with any discovery by the OCC. However, late on March 18, 2009, Ormet received thirty-six (36) interrogatories and fifteen (15) requests for production of documents from the OCC (Attachment A). These discovery requests are large in number and many are very broad in scope; the requests will certainly require a significant amount of time and manpower for Ormet to respond to them.

Now that Ormet has had at least an opportunity to review the scope and subject matter of the discovery requests served by the OCC, it must oppose the OCC's motion to shorten discovery response time. Responding to the discovery requests will impose a significant burden on Ormet, and shortening the response time for such extensive and broad discovery requests from 20 days to 7 days would be unreasonable and cause a significant hardship upon Ormet. The OCC has pointed to no circumstances or exigency that would warrant imposing such a significant burden on Ormet

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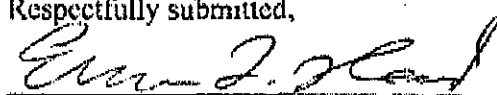
of serving all responses within seven (7) days. Nor has the OCC as yet attempted to narrow its requests or make them specific and targeted, so as to facilitate Ormet's ability to respond more quickly and easily. Through its motion, the OCC seeks to increase the significant burdens of such discovery on other parties while giving itself more time to analyze responses to its discovery requests. But the OCC fails to establish any prejudice if Ormet avails itself of the full twenty (20) day period in which to respond to discovery requests. While Ormet appreciates that the OCC (like every party in this case) needs sufficient time to prepare its case, Ormet has faith that the Commission will provide the parties with sufficient time to prepare their cases without the need to unduly shorten the response time for discovery requests.

Nevertheless, Ormet is willing, in the interest of an expeditious resolution of its pending application, and to the extent it is able to do so given the resource and time constraints of its personnel, to serve rolling responses to OCC's discovery requests as responses may be completed before the April 7, 2009 deadline to serve discovery responses.

CONCLUSION

WHEREFORE, Ormet respectfully requests that the Commission deny OCC's Motion to Shorten Discovery Response Time.

Respectfully submitted,



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*Attorneys for Ormet Primary Aluminum
Corporation*

Dated: March 20, 2009

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Application has been served upon the below-named persons via regular U.S. Mail Service, postage prepaid, this 20th day of March, 2009.



Emma F. Hand

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Attachment A

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ormet)
Primary Aluminum Corporation for) Case No. 09-119-EL-AEC
Approval of a Unique Arrangement with)
Ohio Power Company and Columbus)
Southern Power Company.)

**THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S FIRST SET OF
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED UPON ORMET PRIMARY ALUMINUM CORPORATION**

(DATED MARCH 18, 2009)

The Office of the Ohio Consumers' Counsel, (OCC) a movant to intervene in the above-captioned proceeding before the Public Utilities Commission of Ohio (PUCO) submits the following Interrogatories and Requests for Production of Documents pursuant to Sections 4901-1-19 and 4901-1-20 and of the Ohio Adm. Code for response from Ormet Primary Aluminum Corporation within 20 days and no later than April 7, 2009 – or earlier if the Commission orders an earlier response period. An electronic response should be provided to the extent possible to the OCC at the following addresses:

Gregory J. Poulos, Counsel of Record
Maureen R. Grady
Assistant Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
(614) 466-8574
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Additionally, Ormet Primary Aluminum Corporation must follow the instructions provided herein in responding to the inquiries. Definitions are provided that are used in the OCC's discovery.

DEFINITIONS

As used herein the following definitions apply:

1. "Document" or "Documentation" when used herein, is used in its customary broad sense, and means all originals of any nature whatsoever, identical copies, and all non-identical copies thereof, pertaining to any medium upon which intelligence or information is recorded in your possession, custody, or control regardless of where located; including any kind of printed, recorded, written, graphic, or photographic matter and things similar to any of the foregoing, regardless of their author or origin. The term specifically includes, without limiting the generality of the following: punchcards, printout sheets, movie film, slides, PowerPoint slides, phonograph records, photographs, memoranda, ledgers, work sheets, books, magazines, notebooks, diaries, calendars, appointment books, registers, charts, tables, papers, agreements, contracts, purchase orders, checks and drafts, acknowledgments, invoices, authorizations, budgets, analyses, projections, transcripts, minutes of meetings of any kind, telegrams, drafts, instructions, announcements, schedules, price lists, electronic copies, reports, studies, statistics, forecasts, decisions, and orders, intra-office and inter-office communications, correspondence, financial data, summaries or records of conversations or interviews, statements, returns, diaries, workpapers, maps, graphs, sketches, summaries or reports of investigations or negotiations, opinions or reports of consultants, brochures, bulletins, pamphlets,

articles, advertisements, circulars, press releases, graphic records or representations or publications of any kind (including microfilm, videotape and records, however produced or reproduced), electronic (including e-mail), mechanical and electrical records of any kind and computer produced interpretations thereof (including, without limitation, tapes, tape cassettes, disks and records), other data compilations (including, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, disks and recordings used in automated data processing together with the programming instructions and other material necessary to translate, understand or use the same), all drafts, prints, issues, alterations, modifications, changes, amendments, and mechanical or electric sound recordings and transcripts to the foregoing. A request for discovery concerning documents addressing, relating or referring to, or discussing a specified matter encompasses documents having a factual, contextual, or logical nexus to the matter, as well as documents making explicit or implicit reference thereto in the body of the documents. Originals and duplicates of the same document need not be separately identified or produced; however, drafts of a document or documents differing from one another by initials, interlineations, notations, erasures, file stamps, and the like shall be deemed to be distinct documents requiring separate identification or production. Copies of documents shall be legible.

2. "Communication" shall mean any transmission of information by oral, graphic, written, pictorial, or otherwise perceptible means, including, but not limited to, telephone conversations, letters, telegrams, and personal conversations. A request seeking the identity of a communication addressing, relating or referring to, or

discussing a specified matter encompasses documents having factual, contextual, or logical nexus to the matter, as well as communications in which explicit or implicit reference is made to the matter in the course of the communication.

3. The "substance" of a communication or act includes the essence, purport or meaning of the same, as well as the exact words or actions involved.
4. "And" or "Or" shall be construed conjunctively or disjunctively as necessary to make any request inclusive rather than exclusive.
5. "You," and "Your," or "Yourself" refer to the party requested to produce documents and any present or former director, officer, agent, contractor, consultant, advisor, employee, partner, or joint venturer of such party.
6. Each singular shall be construed to include its plural, and vice versa, so as to make the request inclusive rather than exclusive.
7. Words expressing the masculine gender shall be deemed to express the feminine and neuter genders; those expressing the past tense shall be deemed to express the present tense; and vice versa.
8. "Person" includes any firm, corporation, joint venture, association, entity, or group of natural individuals, unless the context clearly indicates that only a natural individual is referred to in the discovery request.
9. "Economic development" is meant to include activities that facilitate the state's effectiveness in the global economy, to promote job growth and retention in the state, to ensure the availability of reasonably priced electric service, to promote energy efficiency and to provide a means of giving appropriate incentives to technologies that can adapt successfully to environmental mandates in furtherance

of the policy of the state of Ohio embodied in section 4928.02 of the Revised Code.

10. "Identify," or "the identity of," or "identified" means as follows:
- A. When used in reference to an individual, to state his full name and present or last known position and business affiliation, and his position and business affiliation at the time in question;
 - B. When used in reference to a commercial or governmental entity, to state its full name, type of entity (e.g., corporation, partnership, single proprietorship), and its present or last known address;
 - C. When used in reference to a document, to state the date, author, title, type of document (e.g., letter, memorandum, photograph, tape recording, etc.), general subject matter of the document, and its present or last known location and custodian;
 - D. When used in reference to a communication, to state the type of communication (i.e., letter, personal conversation, etc.), the date thereof, and the parties thereto and the parties thereto and, in the case of a conversation, to state the substance, place, and approximate time thereof, and identity of other persons in the presence of each party thereto;
 - E. When used in reference to an act, to state the substance of the act, the date, time, and place of performance, and the identity of the actor and all other persons present; and
 - F. When used in reference to a place, to state the name of the location and provide the name of a contact person at the location (including that person's

telephone number), state the address, and state a defining physical location
(for example: a room number, file cabinet, and/or file designation).

11. The terms "PUCO" and "Commission" refer to the Public Utilities Commission of Ohio, including its Commissioners, personnel (including Persons working for the PUCO Staff as well as in the Public Utilities Section of the Ohio Attorney General's Office), and offices.
12. The term "e.g." connotes illustration by example, not limitation.
13. "OCC" means the Office of the Ohio Consumers' Counsel.
14. Unless otherwise stated, "Application" and/or "Schedule" refer to the documents contained in the "Application of Ormet Primary Aluminum Corporation" filed in Case No. 09-119-EL-AEC.
15. "Ormet" or "Company" means Ormet Primary Aluminum Corporation.
16. "OP" means Ohio Power Company.
17. "CSP" means Columbus Southern Power Company.
18. "AEP" means Ohio Power Company and Columbus Southern Power collectively.
19. "Ohio EPA" means the Ohio Environmental Protection Agency.

INSTRUCTIONS FOR ANSWERING

1. All information is to be divulged which is in your possession or control, or within the possession or control of your attorney, agents, or other representatives of yours or your attorney.
2. Where an interrogatory calls for an answer in more than one part, each part should be separate in the answer so that the answer is clearly understandable.
3. Each interrogatory shall be answered separately and fully in writing under oath, unless it is objected to, in which event the reasons for objection shall be stated in lieu of an answer. The answers are to be signed by the person making them, and the objections are to be signed by the attorney or other person making them.
4. If any answer requires more space than provided, continue the answer on the reverse side of the page or on an added page.
5. Your organization(s) is requested to produce responsive materials and information within its physical control or custody, as well as that physically controlled or possessed by any other person acting or purporting to act on your behalf, whether as an officer, director, employee, agent, independent contractor, attorney, consultant, witness, or otherwise.
6. Where these requests seek quantitative or computational information (e.g., models, analyses, databases, and formulas) stored by your organization(s) or its consultants in computer-readable form, in addition to providing hard copy (if an electronic response is not otherwise provided as requested), you are requested to produce such computer-readable information, in order of preference:
 - A. Microsoft Excel worksheet files on compact disk;

- B. other Microsoft Windows or Excel compatible worksheet or database diskette files;
 - C. ASCII text diskette files; and
 - D. such other magnetic media files as your organization(s) may use.
7. Unless otherwise indicated, the following requests shall require you to furnish information and tangible materials pertaining to, in existence, or in effect for the whole or any part of the period from January 1, 2000 through and including the date of your response.
8. Responses must be complete when made, and must be supplemented consistent with Ohio Adm. Code 4901-1-16(D). Additionally, in accordance with Ohio Adm. Code 4901-1-16(D)(5) the OCC is specifically requesting that all responses be supplemented with subsequently acquired information at the time such information is available.
9. In the event that a claim of privilege is invoked as the reason for not responding to discovery, the nature of the information with respect to which privilege is claimed shall be set forth in responses together with the type of privilege claimed and a statement of all circumstances upon which the respondent to discovery will rely to support such a claim of privilege (i.e. provide a privilege log). Respondent to the discovery must a) identify (see definition) the individual, entity, act, communication, and/or document that is the subject of the withheld information based upon the privilege claim, b) identify all persons to whom the information has already been revealed, and c) provide the basis upon which the information is being withheld and the reason that the information is not provided in discovery.

INTERROGATORIES¹

INT-1. What are the rate schedules under which Ormet would be served if it were not served under its proposed unique arrangement with AEP? What are the most current riders that would apply under such schedule?

RESPONSE:

INT-2. What are the billing determinants (energy, and capacity) of Ormet in the last 24 months using the rate schedules that would apply if there were no reasonable arrangements?

RESPONSE:

INT-3. Referring to the Company's response to OCC Interrogatory No. 2, what are the billing determinants (energy and capacity) using the rates as proposed in the Application?

RESPONSE:

¹ In accordance with Ohio Adm. Code 4901-1-16(D)(5) the OCC is specifically requesting that all responses be supplemented with subsequently acquired information at the time such information is available.

INT-4. Please identify all persons at Ormet who have had contact with the AEP with respect to the unique arrangement proposed in this proceeding. Include with that identification the position of the person(s), as well as the business address.

RESPONSE:

INT-5. Please identify the estimated amount of delta revenues produced on a yearly basis by the unique arrangement proposed in this proceeding between Ormet and AEP. (for the period proposed in the Application). Please provide an explanation of how the delta revenues that would be produced by this unique arrangement are calculated providing all assumptions made, and all rate comparisons, including schedules, and riders that are components of the delta revenue calculation provided in response to the preceding interrogatory.

RESPONSE:

INT-6. Is Ormet's reduction facility expected to be in full operation over the term of the unique operation? If the Company's response is not affirmative, what is the expected operation of the facility?

RESPONSE:

INT-7. Referring to page 4, paragraph 6 of the Application and the statement "Ormet supports large legacy costs": please:

a. identify all the "large legacy costs";

RESPONSE:

b. provide a description of each cost; and

RESPONSE:

c. and the amount of each cost.

RESPONSE:

INT-8. Referring to page 5, paragraph 9 of the Application, what are the plans of Ormet to "pursue a refinancing of the company."

RESPONSE:

INT-9. Referring to page 6, paragraph 9 of the Application, please explain how Ormet makes the determination each year of the amount of \$/MWh it could pay that would produce the minimum cash flow necessary to sustain operations and pay its required legacy pension costs?

RESPONSE:

INT-10. Referring to page 6, paragraph 11 of the Application, identify the "reasonable steps" Ormet will take to retain jobs for the term of the unique arrangement.

RESPONSE:

INT-11. Referring to page 6, paragraph 11 of the Application and the statement "Without the Unique Arrangement, it would be difficult, if not impossible, for Ormet to sustain operations at the Hannibal Facilities." Please identify which Unique Arrangement Ormet is referring to (the current arrangement or the one proposed in this Application) and identify all facts that support the "it would be difficult, if not impossible" statement.

RESPONSE:

INT-12. Referring to page 8, paragraph 14 of the Application, please explain how other AEP Ohio customers "share in the benefit of rising aluminum prices" under the unique arrangement proposed? Is Ormet assuming that premium payments for aluminum will be passed onto AEP Ohio customers? What is this assumption based on?

RESPONSE:

INT-13. Referring to page 5, paragraph 9 of the Application, please explain what Ormet means when it states that it has "sold forward its 2009 metal production."

RESPONSE:

INT-14. Referring to page 5, paragraph 9 of the Application, please explain how Ormet will develop the "target price."

RESPONSE:

INT-15. Referring to page 6, section 1.07 of the Attachment A to the Application and the statement: revenue that is "foregone by AEP Ohio as a result of the provisions of this Power Arrangement" -- is this revenue based on tariff or on market prices?

RESPONSE:

INT-16. If the Hannibal facilities are shut down, and this results in the Power Agreement terminating, is it Ormet's intention to refund to customers the discount granted over the time elapsed?

RESPONSE:

INT-17. Is it Ormet's intention that the discount under the unique operation apply to the entire operations of Ormet or just its operations at its Hannibal facilities?

RESPONSE:

INT-18. How does the term of the unique agreement requested here coincide with the interim arrangement approved by the Commission in Case Nos. 08-13338-EL-AAM and 08-13339-EL-UNC? Which rate does Ormet be should be applied for January 2009 through present?

RESPONSE:

INT-19. Has Ormet made the determination of what AEP's energy efficiency requirements are and whether Ormet's energy efficiency measures can be counted under S.B. 221 per the PUCO rules? If so, please describe such findings.

RESPONSE:

INT-20. The London Metal Exchange ("LME") publishes two daily cash prices for Aluminum, "Primary Aluminum", and "Aluminum Alloy."²² Which price will be used to arrive at the average referenced in section 1.16 of Attachment A (page 7 of the Power Agreement) and in determining the "LME Price" referenced in Schedules "A", and "B"?

RESPONSE:

INT-21. Referring to the Company's response to OCC Interrogatory No. 20, (as an example) what are the daily prices that would be used for the period of March 2 – March 16, 2009? Please explain how you arrived at your answer.

RESPONSE:

INT-22. Referring to page 6, paragraph 9 of the Application and the statement that the "Target Price" is "the price of aluminum as reported on the LME at which Ormet would be able to pay the AEP Ohio Tariff Rate, and still maintain the minimum cash flow necessary to maintain its operations and pay its required legacy pension costs":

²² See <http://www.lme.co.uk/aluminium.asp>

- a. What is the methodology used to calculate this "Target Price"?

RESPONSE:

- b. Does Ormet intend to use exactly the same methodology every year?

RESPONSE:

INT-23. Referring to Attachment A, page 1 of the Application, please explain how the target price of "AEP Ohio Tariff Rate = 38.43/MWh" for 2009 was calculated.

RESPONSE:

INT-24. Referring to Attachments A and B of the Application and the statements that Ormet shall pay the "AEP Ohio Tariff Rate minus \$0.0490/MWh for each \$1/tonne less than the target LME price" how did Ormet calculate this coefficient of \$00.0490/MWh for each \$1/tonne less than the target LME price?

RESPONSE:

- INT-25. Referring to Attachments A and B of the Application and the statements that Ormet's rate shall be "102% of the AEP Ohio Tariff Rate", if the LME Price is "Greater than the Target LME Price but not more than \$300 above the Target LME Price", please explain why the Company proposes:
- a. The 102% of the AEP Ohio Tariff Rate;

RESPONSE:

- b. The "greater than the Target LME price but no more than \$300 above the Target LME price"; and

RESPONSE:

- c. To rely on the "Greater than the Target LME Price but no more than \$300 above the Target LME Price" to create an Ormet rate of "102% of the AEP Ohio Tariff Rate."

RESPONSE:

INT-26. Referring to Attachments A and B of the Application and the statements that Ormet's rate shall be "105% of the AEP Ohio Tariff Rate", if the LME Price is "Greater than \$300 above the Target LME Price", please explain why the Company proposes:

- a. The 105% of the AEP Ohio Tariff Rate;

RESPONSE:

- b. The "greater than \$300 above the Target LME price"; and

RESPONSE:

- c. To rely on the "Greater than \$300 above the Target LME Price" to create an Ormet rate of "105% of the AEP Ohio Tariff Rate."

RESPONSE:

INT-27. Referring to page 6, paragraph 10 of the Application, please provide a numerical example of how the Ormet's Electricity rates shall be highlighting the impact of variation in LME prices, and the truing up mechanism. Please identify the assumptions used in the example to facilitate an evaluation of the calculation.

RESPONSE:

INT-28. Did Ormet conduct any study on the cost, advantages/disadvantages of procuring their load and energy needs directly from the wholesale electricity market rather than from AEP? If so, please identify and describe this study. If no study has been conducted, please explain why not?

RESPONSE:

INT-29. Referring to page 5, footnote 8 of the Application, if the term "delta" revenue is defined as the difference between what Ormet shall be paying at the contracted rate, and what it would have paid under the applicable rates in GS-4 in both Ohio Power and Columbus Southern Power Company (on 50%-50% basis), what would be this term in 2009.

RESPONSE:

INT-30. If Ormet does not implement any energy efficiency projects or demand response during the term of the contract, will Ormet be obligated to comply (and pay) with the terms of energy efficiency rider that is proposed by AEP in the ESP case? Please explain.

RESPONSE:

INT-31. On page 18, section 11.02 of Attachment A (to the Application), is it contemplated in the separate agreement alluded to, that AEP would help Ormet finance the required capital investment for energy efficiency projects outside the normal course of its process improvements? If the answer is affirmative, will Ormet be obligated to comply (and pay) with the terms of energy efficiency rider that is proposed by AEP in the ESP case? Please explain.

RESPONSE:

INT-32. On pages 18-19, section 12.01 of Attachment A (to the Stipulation), is it contemplated in the separate agreement alluded to concerning demand response options, that additional delta revenues would be created?

RESPONSE:

INT-33. Referring to page 2, paragraph 2 of the Application and the statement "Many smelters throughout the nation and the rest of the world pay much less for their power than does Ormet." Please identify:

- a. The smelters throughout the nation and the rest of the world that pay less for their power than Ormet; and

RESPONSE:

- b. The smelters throughout the nation and the rest of the world that pay more for their power than Ormet.

RESPONSE:

INT-34. Referring to page 2, paragraph 3 of the Application and the statement
"There are numerous examples both in the United States and abroad where
special arrangements are in place to ensure competitive electricity prices
for aluminum producers." Please identify all of the "examples."

RESPONSE:

INT-35. Identify each person Ormet intends to call as a witness at the hearing in
this case.

RESPONSE:

INT-36. For each person identified by Ormet in response to OCC Interrogatory No.
35, please identify the substance of each opinion on which the witness will
testify.

RESPONSE:

REQUEST FOR PRODUCTION OF DOCUMENTS

- RPD-1. Please provide copies of all documents, communications, and information in Ormet's possession that refer to benefits to AEP associated with economic development, and this unique arrangement.
- RPD-2. Please provide copies of all documents, communications, and information in Ormet's possession that relate to the benefits to Ormet associated with the unique arrangement it is requesting.
- RPD-3. Please provide the hourly load for Ormet in the last two years (i.e., 8760 observation) in a format usable by Excel. If service is provided to more than one account for Ormet, please provide the same information for each account.
- RPD-4. Please provide copies of all documents, communications, and information including workpapers that detail the calculation of the entire delta revenue produced over the life of the prior Ormet special contract with AEP that expired December 31, 2008.
- RPD-5. Please provide a copy of all documents, communications, and information that detail the delta revenues and the calculation of delta revenues associated with the Ormet contract/special arrangement with AEP.

- RPD-6. Please provide those documents, communications, and information relating to or supporting the Company's response to OCC Interrogatory No. 5 regarding the estimated amount of delta revenues produced on a yearly basis by the unique arrangement proposed in this proceeding between Ormet and AEP.
- RPD-7. Please provide copies of all documents, communications, and information in Ormet's possession related to the negotiation of the unique arrangement between Ormet and AEP.
- RPD-8. Please provide all documents, communications, and information relating to the following statement made in the Ormet application at page 2 "Many smelters through the nation and the rest of the world pay much less for their power than does Ormet."
- RPD-9. Please provide those documents, communications, and information relating to or supporting the Company's response to OCC Interrogatory No. 9 regarding Ormet's determination each year of the minimum cash flow necessary to sustain operations and pay its required legacy pension costs.

- RPD-10 Please provide those documents, communications, and information relating to or supporting the Company's response to OCC Interrogatory No. 11 regarding the facts that support the "it would be difficult, if not impossible" statement.
- RPD-11. Please provide those documents, communications, and information relating to or supporting the Company's response to OCC Interrogatory No. 12 regarding the statement that AEP Ohio Customers would "share in the benefit of rising aluminum prices."
- RPD-12. Please provide those documents, communications, and information relating to or supporting the Company's response to OCC Interrogatory No. 14 regarding developing the "target price."
- RPD-13. Please provide those documents, communications, and information relating to or supporting the Company's response to OCC Interrogatory No. 19 regarding the Company's determination of AEP's energy efficiency requirements.
- RPD-14. Please provide those documents, communications, and information relating to or supporting the Company's response to OCC Interrogatory No. 27 regarding the impact of variations in LME prices – and the truing up mechanism on Ormet's electricity rates.

RPD-15. Please provide those documents, communications, and information relating to or supporting the Company's response to OCC Interrogatory No. 28 regarding studies conducted by the Company on the cost, advantages/disadvantages of procuring its load and energy needs directly from the wholesale electricity market rather than from AEP.