

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application for Establishment of a Reasonable Arrangement between Eramet Marietta, Inc. and Columbus Southern Power Company.

Case No. 09-516-EL-AEC

MOTION FOR ADMISSION PRO HAC VICE OF GREGORY TIMMONS

Samuel C. Randazzo (Trial Attorney) Thomas L. Froehle Lisa G. McAlister McNees Wallace & Nurick LLC 21 East State Street, 17TH Floor Columbus, OH 43215 Telephone: (614) 469-8000 Telecopier: (614) 469-4653

July 20, 2009

Attorneys for Eramet Marietta, Inc.

This is to cartify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business rechnician ______ Date Processed 7/21/09

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application for Establishment of a Reasonable Arrangement between Eramet Marietta, Inc. and Columbus Southern Power Company.

Case No. 09-516-EL-AEC

MOTION FOR ADMISSION PRO HAC VICE OF GREGORY TIMMONS

Now comes Lisa G. McAlister, an attorney licensed to practice law in the State of Ohio, and, pursuant to Rule 4901-1-08(B), Ohio Administrative Code, hereby moves the Commission to permit Gregory Timmons to appear and participate as co-counsel for Eramet Marietta, Inc. in the above-captioned case. The basis for this Motion is set forth in the attached Memorandum in Support.

Respectfully submitted,

Samuel C. Randazzo (Trial Attorney) Thomas L. Froehle Lisa G. McAlister McNees Wallace & Nurick LLC 21 East State Street, 17TH Floor Columbus, OH 43215 Telephone: (614) 469-8000 Telecopier: (614) 469-4653

Attorneys for Eramet Marietta, Inc.

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application for Establishment of a Reasonable Arrangement between Eramet Marietta, Inc. and Columbus Southern Power Company.

Case No. 09-516-EL-AEC

MEMORANDUM IN SUPPORT

Lisa G. McAlister, an attorney licensed to practice law in the State of Ohio, hereby moves the Commission, pursuant to Rule 4901-1-08(B), Ohio Administrative Code, to permit Gregory Timmons to appear and participate as co-counsel before this Commission in this proceeding. Mr. Timmons is Corporate Counsel of Eramet Marietta, Inc.'s parent company, Eramet S.A., and is licensed to practice in the State of Pennsylvania (PA Id. No. 69461). Mr. Timmons has represented Eramet Marietta, Inc., and its subsidiaries before the Ohio Environmental Appeals Board and in other forums. It is respectfully requested that the Commission grant this Motion for Admission Pro Hac Vice.

Respectfully submitted,

Samuel C. Randazzo (Trial Attorney) Thomas L. Froehle Lisa G. McAlister McNees Wallace & Nurick LLC 21 East State Street, 17TH Floor Columbus, OH 43215 Telephone: (614) 469-8000 Telecopier: (614) 469-4653

July 20, 2009

Attorneys for Eramet Marietta, Inc.

Certificate of Service

I hereby certify that a copy of the foregoing Motion Pro Hac Vice and Memorandum in Support were served upon the following parties of record this 20th day of July 2009, via hand-delivery, electronic transmission or first class mail, postage prepaid.

Lisa G. McAlister

Marvin I. Resnik, Counsel of Record Steven T. Nourse American Electric Power Service Corporation 1 Riverside Plaza, 29th Floor Columbus, OH 43215

ON BEHALF OF AMERICAN ELECTRIC POWER

Gregory J. Poulos Assistant Consumers' Counsel Janine Migden-Ostrander Consumers' Counsel Office of the Ohio Consumers' Counsel 10 West Broad Street, 18th Floor Columbus, OH 43215

ON BEHALF OF THE OFFICE OF THE OHIO CONSUMERS' COUNSEL

David F. Boehm Michael L. Kurtz Boehm, Kurtz & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, OH 45202

ON BEHALF OF THE OHIO ENERGY GROUP

Robert Fortney Utilities Department Public Utilities Commission of Ohio 180 East Broad Street, 3rd Floor Columbus, OH 43215 Duane Luckey Chief, Attorney General's Section Public Utilities Commission of Ohio 180 East Broad Street, 9th Floor Columbus, OH 43215

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

Greg Price Rebecca Hussey Attorney Examiners Public Utilities Commission of Ohio 180 East Broad Street Columbus, OH 43215

ATTORNEY EXAMINERS