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Sonnenschein  
SONNENSCHN NATH & ROSENTHAL LLP

Emma F. Hand  
202.408.7094  
ehand@sonnenschein.com

December 22, 2009

VIA FEDERAL EXPRESS

Public Utilities Commission of Ohio  
Docketing Division  
180 East Broad Street  
Columbus, Ohio 43215-3793

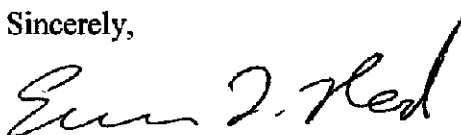
Re: Enclosed Documents for Filing in Case Nos. 09-872-EL-FAC, 09-873-EL-FAC, 09-1906-EL-ATA, 09-1094-EL-UNC, and 09-1095-EL-UNC

Dear Sir or Madam:

Enclosed please find an original and twenty (20) copies each of Ormet Primary Aluminum Corporation's ("Ormet") Reply to Columbus Southern Power Company's and Ohio Power Company's Memorandum Contra in Case Nos. 09-872-EL-FAC, 09-873-EL-FAC, 09-1906-EL-ATA, 09-1094-EL-UNC, and 09-1095-EL-UNC. This document was originally filed by facsimile on December 22, 2009. Two additional copies of the Reply are enclosed to be date-stamped and returned to me in the enclosed, self-addressed Federal Express envelope.

Thank you for your assistance in this matter. If you have any questions please contact me at the telephone number above.

Sincerely,



Emma F. Hand

Enclosures

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**Case No. 09-1906-EL-ATA**

**Case No. 09-1094-EL-UNC**

**Case No. 09-1095-EL-UNC**

Although, as AEP Ohio argues, Staff has noted that the caps on increases in customer bills are to be applied on a customer class basis such that individual customers may see increases in their bills which are greater than or less than the caps set forth by the Commission, nevertheless, such calculations should be performed in a just and reasonable manner. AEP Ohio has not offered a satisfactory explanation for why it believes that it is appropriate to calculate the

revenue requirement applicable to Ormet separately from the calculation of the revenue requirement for the rest of its GS-4 customers, but then to apply the GS-4 rate to Ormet. This discrepancy in the treatment of Ormet creates a result where AEP Ohio collects more from Ormet under the GS-4 rate than is indicated by the Ormet-specific revenue requirement calculation. If there is reason not to include Ormet in calculating the overall increase to each Company's GS-4 tariff rates, then AEP Ohio should not apply the GS-4 FAC rate to Ormet, but should apply an Ormet-specific FAC rate. AEP Ohio's failure to apply a consistent methodology to its calculations concerning Ormet increase the amount of revenue AEP Ohio will collect and creates the possibility that AEP Ohio may be over-collecting.


AEP Ohio also appears to argue that the standard tariff rates are irrelevant to the rate Ormet pays because Ormet will pay a special rate under its Unique Arrangement with AEP Ohio. While this was the case through the end of 2009 because Ormet's rates for 2009 have been fixed for the entire year under the Interim Agreement and then under the Unique Arrangement, it is not the case for 2010. Beginning in 2010, under the Unique Arrangement, the rate that Ormet will pay will not be a fixed rate, but will be a rate that would be discounted from the GS-4 tariff rate if the London Metal Exchange ("LME") price of aluminum stays low. If LME prices increase above the Target Price set under the Unique Arrangement, Ormet will be paying a premium above the GS-4 tariff rate. Thus, the GS-4 tariff rate applicable to Ormet directly impacts the rates that Ormet will pay in 2010, and the higher that rate is, the more Ormet (or AEP Ohio's other customers paying delta revenues) will pay. Additionally, the discount that Ormet will receive in 2010 is capped at \$60 million. If the market price of aluminum increases sufficiently in 2010, then under the Unique Arrangement, there is a possibility that Ormet will consume less than the full amount of the discount, which would reduce the amount AEP Ohio's other

ratepayers are required to pay through the EDR rider. This possibility is made more remote, however, the higher that that GS-4 tariff rate applicable to Ormet climbs.

Finally, Ormet supports the motion to consolidate of the Industrial Energy Users-Ohio ("IEU-Ohio") and their argument that under the orders issued in AEP Ohio's electric security plan ("ESP") cases, the economic development rider should be subject to the Commission-mandated limitations on AEP Ohio's rate increases.

WHEREFORE, Ormet respectfully requests that the Commission set these matters for hearing.

Respectfully submitted,



Clinton A. Vince, Counsel of Record

Douglas G. Bonner

Daniel D. Barnowski

Emma F. Hand

Keith C. Nusbaum (#0082745)

Sonnenschein Nath & Rosenthal LLP

1301 K Street NW

Suite 600, East Tower

Washington, DC 20005

202.408.8004 Telephone

202.408.6399 Facsimile

[cvince@sonnenschein.com](mailto:cvince@sonnenschein.com)

[dbonner@sonnenschein.com](mailto:dbonner@sonnenschein.com)

[dbarnowski@sonnenschein.com](mailto:dbarnowski@sonnenschein.com)

[ehand@sonnenschein.com](mailto:ehand@sonnenschein.com)

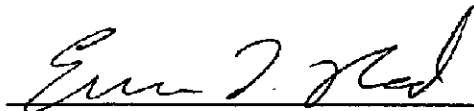
[knusbaum@sonnenschein.com](mailto:knusbaum@sonnenschein.com)

*Attorneys for Ormet Primary Aluminum  
Corporation*

Dated: December 22, 2009

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of Ormet Primary Aluminum Corporation's Reply to Columbus Southern Power Company's and Ohio Power Company's Memorandum Contra were served by U.S. Mail upon counsel identified below for all parties of record this 22nd day of December, 2009.



Emma F. Hand

### **SERVICE LIST**

Columbus Southern Power Company  
Ohio Power Company  
Selwyn J. R. Dias  
Suite 800 88 E. Broad Street  
Columbus OH 43215-3550

Marvin I. Resnik  
American Electric Power Company  
1 Riverside Plaza, 29<sup>th</sup> Floor  
Columbus OH 43215

Michael Idzkowski  
Maureen Grady  
Ohio Consumers' Counsel  
10 W. Broad Street Suite 1800  
Columbus OH 43215-3485

Samuel C. Randazzo  
Lisa McAlister  
Joseph M. Clark  
McNees Wallace & Nurick, LLC  
21 East State Street, 17th Floor  
Columbus, OH 43215

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