

**FILE**

RECEIVED-DOCKETING DIV

FAX TRANSMISSION

2011 APR 19 PM 3:44

DATE • April 19, 2011

PUCO

**FAX**

PLEASE DELIVER THE FOLLOWING PAGES TO:

NAME • Docketing Division  
 FIRM • The Public Utilities Commission  
 PHONE • 1-614-466-4095  
 FAX • 1-614-466-0313  
 CLIENT/MATTER • 30000460-0002  
 FROM • Emma F. Hand 202-408-7094

TOTAL NUMBER OF PAGES TRANSMITTED, INCLUDING THIS SHEET: 41

MESSAGE • Attached please find our cover letter along with the following filings:

Notice of Amendment or Withdrawal of Prior Filings of Ormet Primary Aluminum Corporation; (4 pages)

Amended Motion to Intervene of Ormet Primary Aluminum Corporation and Memorandum in Support; (14 pages)

Motion for Permission to Appear Pro Hac Vice of Emma F. Hand; (7 pages)

Motion for Permission to Appear Pro Hac Vice of Douglas G. Bonner; (7 pages)

and,

Motion to Consolidate of Ormet Primary Aluminum Corporation and Memorandum in Support.(6 pages)

\*Original will follow via FedEx.

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.  
 Technician SM Date Processed APR 19 2011

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

)  
 )  
**In the Matter of the Application of** )  
**Columbus Southern Power Company and** )  
**Ohio Power Company, Individually and, if** ) **Case No. 11-351-EL-AIR**  
**Their Proposed Merger is Approved, as a** ) **Case No. 11-352-EL-AIR**  
**Merged Company (collectively, AEP Ohio)** )  
**for an Increase in Electric Distribution Rates** )  
 )  
 )

)  
 )  
**In the Matter of the Application of** )  
**Columbus Southern Power Company and** )  
**Ohio Power Company, Individually and, if** ) **Case No. 11-353-EL-ATA**  
**Their Proposed Merger is Approved, as a** ) **Case No. 11-354-EL-ATA**  
**Merged Company (collectively AEP Ohio)** )  
**for Tariff Approval** )  
 )  
 )

)  
 )  
**In the Matter of the Application of** )  
**Columbus Southern Power Company and** )  
**Ohio Power Company, Individually and, if** ) **Case No. 11-356-EL-AAM**  
**Their Proposed Merger is Approved, as a** ) **Case No. 11-358-EL-AAM**  
**Merged Company (collectively AEP Ohio)** )  
**for Approval to Change Accounting Methods** )  
 )

---

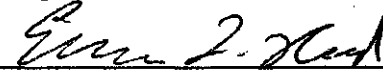
**MOTION TO CONSOLIDATE OF  
ORMET PRIMARY ALUMINUM CORPORATION**

---

Ormet Primary Aluminum Corporation ("Ormet") hereby respectfully moves the Public Utilities Commission of Ohio to formally consolidate the above six proceedings under one case number. Formal consolidation under one case number would permit Ormet's *pro hac vice* counsel to represent the Company in all six proceedings without contravening Gov.Bar R.XII, which provides that each *pro hac vice* attorney may appear in no more than three Ohio dockets per calendar year.

The reasons for granting this motion are contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,



Douglas G. Bonner (PHV - 1363-2011)

Emma F. Hand (PHV - 1353-2011)

Keith C. Nusbaum (#0082745)

SNR Denton US LLP

1301 K Street NW

Suite 600, East Tower

Washington, DC 20005

202.408.6400 Telephone

202.408.6399 Facsimile

doug.bonner@snrrenton.com

emma.hand@snrrenton.com

keith.nusbaum@snrrenton.com

*Attorneys for Ormet Primary Aluminum Corporation*

Dated: April 19, 2011

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

)  
 )  
**In the Matter of the Application of** )  
**Columbus Southern Power Company and** )  
**Ohio Power Company, Individually and, if** ) **Case No. 11-351-EL-AIR**  
**Their Proposed Merger is Approved, as a** ) **Case No. 11-352-EL-AIR**  
**Merged Company (collectively, AEP Ohio)** )  
**for an Increase in Electric Distribution Rates** )  
 )  
 )

)  
 )  
**In the Matter of the Application of** )  
**Columbus Southern Power Company and** )  
**Ohio Power Company, Individually and, if** ) **Case No. 11-353-EL-ATA**  
**Their Proposed Merger is Approved, as a** ) **Case No. 11-354-EL-ATA**  
**Merged Company (collectively AEP Ohio)** )  
**for Tariff Approval** )  
 )  
 )

)  
 )  
**In the Matter of the Application of** )  
**Columbus Southern Power Company and** )  
**Ohio Power Company, Individually and, if** ) **Case No. 11-356-EL-AAM**  
**Their Proposed Merger is Approved, as a** ) **Case No. 11-358-EL-AAM**  
**Merged Company (collectively AEP Ohio)** )  
**for Approval to Change Accounting Methods** )  
 )  
 )

---

**MEMORANDUM IN SUPPORT OF MOTION TO CONSOLIDATE OF  
ORMET PRIMARY ALUMINUM CORPORATION**

---

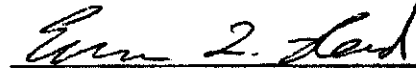
Ormet Primary Aluminum Corporation (“Ormet”) requests that the Public Utilities Commission of Ohio (“Commission”) formally consolidate the above six proceedings under one case number to permit Ormet’s *pro hac vice* counsel to participate in all six proceedings while still remaining compliant with the Supreme Court of Ohio’s revised rules for *pro hac vice* admission that became effective on January 1, 2011.

Specifically, Gov.Bar R.XII Section 2(A)(5) of the revised rules states: “An attorney may participate *pro hac vice* in no more than three proceedings under this rule in the same calendar year the application is filed.” While Ormet understands that the Commission is already

treating the six proceedings related to the proposed merger of Columbus Southern Power Company and Ohio Power Company (collectively, "AEP Ohio") as one case, the Supreme Court will not recognize the six dockets as one consolidated docket without a formal consolidation order by the Commission. Without formal consolidation, no one *pro hac vice* attorney can be admitted to all six dockets. A formal order of consolidation will not delay these proceedings or harm any party to these proceedings.

WHEREFORE, Ormet respectfully requests that the Commission grant its motion to consolidate these proceedings.

Respectfully submitted,



Douglas G. Bonner (PHV - 1363-2011)

Emma F. Hand (PHV - 1353-2011)

Keith C. Nusbaum (#0082745)

SNR Denton US LLP

1301 K Street NW

Suite 600, East Tower

Washington, DC 20005

202.408.6400 Telephone

202.408.6399 Facsimile

doug.bonner@snrdenton.com

emma.hand@snrdenton.com


keith.nusbaum@snrdenton.com

*Attorneys for Ormet Primary Aluminum  
Corporation*

Dated: April 19, 2011

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of Ormet Primary Aluminum Corporation's *Motion to Consolidate and Memorandum in Support* were served by U.S. Mail upon counsel identified below for all parties of record this 19th day of April, 2011.



Emma F. Hand

**SERVICE LIST**

Columbus Southern Power Company  
Ohio Power Company  
Selwyn J. R. Dias  
850 Tech Center Drive  
Gahanna OH 43230

The Ohio Hospital Association  
Richard L. Sites  
155 East Broad Street, 15<sup>th</sup> Floor  
Columbus OH 43215-3620

Industrial Energy Users-Ohio  
Samuel C. Randazzo  
Joseph E. Olikier  
Frank P. Darr  
McNees Wallace & Nurick LLC  
21 East State Street, 17<sup>th</sup> Floor  
Columbus OH 43215

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

Steven T. Nourse, Trial Attorney  
Marvin I. Resnik  
Matthew J. Satterwhite  
American Electric Power Company  
1 Riverside Plaza, 29<sup>th</sup> Floor  
Columbus OH 43215

The Ohio Hospital Association  
Thomas J. O'Brien  
Bricker & Eckler LLP  
100 South Third Street  
Columbus OH 43215-4291

The Office of the Ohio Consumers' Counsel  
Maureen R. Grady  
Michael I. Idzkowski  
Richard C. Reese  
Office of the Ohio Consumers' Counsel  
10 West Broad Street, Suite 1800  
Columbus OH 43215-3485

Ohio Partners for Affordable Energy  
Colleen L. Mooney  
231 West Lima Street  
Findlay OH 45839-1793

The Natural Resources Defense Council  
Henry W. Eckhart  
50 West Broad Street #2117  
Columbus OH 43215

FirstEnergy Solutions Corp.  
Mark A. Hayden  
FirstEnergy Service Company  
76 South Main Street  
Akron OH 44308

FirstEnergy Solutions Corp.  
James F. Lang  
Laura C. McBride  
N. Trevor Alexander  
Calfee, Halter & Griswold LLP  
1400 KeyBank Center  
800 Superior Ave.  
Cleveland OH 44114

The Kroger Company  
John W. Bentine  
Mark S. Yurick  
Zachary D. Kravitz  
Chester Willcox & Saxbe, LLP  
65 East State Street, Suite 1000  
Columbus OH 43215

Appalachian Peace and Justice Network  
Michael R. Smalz  
Joseph V. Maskovyak  
Ohio Poverty Law Center  
555 Buttles Avenue  
Columbus OH 43215

OMA Energy Group  
Lisa G. McAlister  
Matthew W. Warnock  
Bricker & Eckler LLP  
100 South Third Street  
Columbus OH 43215

The Ohio Cable Telecommunications Association  
Benita Khan  
Lija Kaleps-Clark  
Vorys, Sater, Seymour and Pease LLP  
52 East Gay Street, P.O. Box 1008  
Columbus OH 43216