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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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DOCKETING DIVISION
Public Utilities Commission of Ohio

In the Matter of the Application of
Columbus Southern Power Company
and Ohio Power Company for Authority
to Establish a Standard Service Offer
Pursuant to Section 4928.143, Revised
Code, in the Form of an Electric
Security Plan.

Case No. 11-346-EL-SSO

Case No. 11-348-EL-SSO

In the Matter of the Application of
Columbus Southern Power Company
and Ohio Power Company for Approval
of Certain Accounting Authority.

Case No. 11-349-EL-AAM

Case No. 11-350-EL-AAM

**MOTION OF ORMET PRIMARY ALUMINUM CORPORATION
FOR LEAVE TO INTERVENE OUT OF TIME**

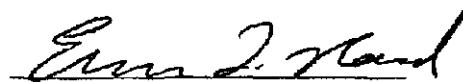
Ormet Primary Aluminum Corporation ("Ormet") hereby respectfully moves for leave to intervene out of time in the above-captioned matters pursuant to R.C. 4903.221 and Section 4901-1-11 of the Public Utilities Commission of Ohio's ("Commission") Code of Rules and Regulations, with full powers and rights granted, by the Commission specifically, by statute or by the provisions of the Commission's Code of Rules and Regulations, to intervening parties.

(continued next page)

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

Respectfully submitted,



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*Attorneys for Ormet Primary Aluminum
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Dated: April 22, 2011

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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**Case No. 11-349-EL-AAM
Case No. 11-350-EL-AAM**

**MEMORANDUM IN SUPPORT OF
MOTION OF ORMET PRIMARY ALUMINUM CORPORATION
FOR LEAVE TO INTERVENE OUT OF TIME**

Ormet Primary Aluminum Corporation ("Ormet") should be permitted to intervene in this matter pursuant to Section 4903.221, Ohio Revised Code, and the Public Utilities Commission of Ohio's ("Commission") Rules and regulations contained in Rule 4901-1-11 of the Ohio Administrative Code. These proceedings will have a substantial effect upon Ormet, which is in a unique position and cannot be adequately represented by any other party to the proceeding. Ormet is a large industrial customer purchasing its generation, distribution and transmission service from Columbus Southern Power Company ("CSP") and Ohio Power Company ("OP") (collectively, "AEP Ohio") under an Unique Arrangement with AEP Ohio, approved by the Commission in Case No. 09-119-EL-AEC. Under this Unique Arrangement, Ormet receives a

discount against the standard tariff rate that would otherwise be applicable to Ormet. Thus, any change in the standard tariff rate impacts the price Ormet must pay for power from AEP Ohio.

In determining whether to permit intervention, the Commission considers the following:

(1) the nature of the person's interest; (2) the legal position advanced by the prospective intervenor and its probable relation to the merits of the case; (3) whether the intervention by the prospective intervenor will unduly prolong or delay the proceedings; (4) whether the prospective intervenor will significantly contribute to full development and equitable resolution of the factual issues; and (5) the extent to which the person's interest is represented by existing parties.¹

Furthermore, Ormet has good cause for not intervening by the deadline set for intervention by the Commission.

A. Ormet Has a Substantial Interest in This Proceeding.

Ormet owns an aluminum reduction facility in Hannibal, Ohio ("Hannibal Facilities"). The reduction facility is physically located in the AEP Ohio service territory and takes generation, transmission and distribution service from CSP and OP under the Unique Arrangement with AEP Ohio approved by the Commission in Case No. 09-119-EL-AEC.

Ormet's facility contributes substantially to the economy in Monroe County, an economically depressed area of Ohio. When at full operation, the Hannibal Facilities employ approximately 1,000 people and pay wages and salaries annually of over \$56 million, but its impact on the region is much larger. The total net annual impact in the region is approximately 3,441 jobs (direct and indirect) and \$195 million in total employee compensation, with an additional \$7 million annual in tax revenues for state and local governments in Ohio.

¹ Ohio Admin. Code 4901-1-11 (2011).

Ormet's ability to keep the Hannibal Facilities at full operation is dependent upon the Unique Arrangement Ormet has with AEP Ohio. Under that agreement, the price Ormet pays for electricity is determined through a formula that links its electricity price to the price of aluminum on the London Metals Exchange ("LME"). However, the discount that Ormet may receive as a result of this formula is capped such that each year Ormet's discount may be no greater than a specified difference from the tariff rate that would otherwise apply to Ormet under AEP Ohio's tariff. Because the cap on Ormet's discount is tied to the standard tariff rate, if the standard tariff rate increases, then so does the rate Ormet must pay for power in years that it uses its full discount.

In addition, under the Unique Arrangement, when the price of aluminum on the LME increases to a certain point, Ormet will pay above-tariff rates that will be used to offset costs borne by other ratepayers. As the tariff rate that would otherwise apply to Ormet increases, the likelihood that Ormet will be able to pay above-tariff rates decreases. Therefore, under the Unique Arrangement, an increase in the AEP Ohio tariff rate that Ormet would pay both increases the rate for power that Ormet must pay (decreasing its ability to keep the Hannibal Facilities at full operation) and decreases the likelihood that Ormet will in the future pay above-tariff rates to offset costs to other ratepayers.

B. Ormet's Legal Position Relates Directly to the Merits of the Case.

Ormet is intervening in this proceeding in order to protect its interests in preventing unjust and unreasonable increases to the AEP Ohio tariff rate that would be applicable to Ormet but for Ormet's Unique Arrangement with AEP Ohio.

C. Granting the Intervention Will Not Unduly Prolong or Delay the Proceeding or Unjustly Prejudice Any Existing Party.

Granting Ormet an intervention in this case will not unduly prolong or delay the proceeding or unjustly prejudice any existing party. Ormet agrees to accept the record as it stands and participate in the case on a prospective basis. In addition, due to the early stage of the proceedings in this case, other parties should have ample opportunity to present counter-arguments and evidence in response to any arguments Ormet makes or evidence it submits. Therefore, Ormet's intervention should neither unduly prolong or delay the proceeding, nor unjustly prejudice any existing party.

D. Ormet's Participation Will Contribute to the Full Development and Just and Expeditious Resolution of Factual Issues in this Proceeding.

Few, if any, other parties are in a situation to assess the impact that AEP Ohio's proposal will have upon the Unique Arrangement between Ormet and AEP Ohio. Under the Unique Arrangement, other ratepayers of AEP Ohio pay the delta revenues created by the Unique Arrangement through AEP Ohio's Economic Development Rider. Without Ormet's participation in this proceeding, it will be difficult for the Commission to develop a record regarding the impact of AEP Ohio's proposal on the Unique Arrangement and the subsequent further impact upon ratepayers. Therefore, Ormet's participation in this proceeding will contribute to the full development of the record and the just and expeditious resolution of factual issues in this proceeding.

E. Ormet's Interest is Not Adequately Represented by Any Other Party.

Due to Ormet's Unique Arrangement with AEP Ohio, no other party can adequately represent Ormet's interests in this case. Ormet is also one of AEP Ohio's largest industrial customers, and as such, few other parties are similarly situated to Ormet in this proceeding.

Ormet's interest in this proceeding is unique and cannot be adequately represented by any other party.


F. Ormet has Good Cause for Not Intervening Earlier in the Proceeding.

The press of other litigation and the need to ascertain the impact of the recent change in *pro hac vice* rules upon Ormet's representation have prevented Ormet from participating in this proceeding prior to this date. Further, Ormet believes that the Commission's stated policy "to encourage the broadest possible participation in its proceedings"² warrants permitting Ormet's intervention in this proceeding.

G. Conclusion.

For the foregoing reasons, Ormet respectfully requests that the Commission grant its motion to intervene out of time in this proceeding.

Respectfully submitted,


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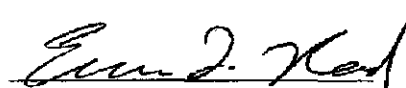
*Attorneys for Ormet Primary Aluminum
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Dated: April 22, 2011

² *Cleveland Elec. Illum. Co.*, Case No. 85-675-EL-AIR, Entry dated January 14, 1986, at 2.

CERTIFICATE OF SERVICE

I hereby certify that a copy of Ormet Primary Aluminum Corporation's *Motion for Leave to Intervene Out of Time* and *Memorandum in Support* were served by U.S. Mail and electronic mail upon counsel identified below for all parties of record this 22nd day of April 2011.


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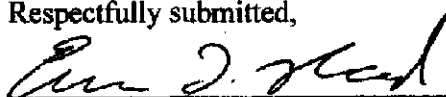
Case No. 11-350-EL-AAM

**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 four 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 four 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,



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Dated: April 22, 2011

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**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 four proceedings under one case number to permit Ormet's *pro hac vice* counsel to participate in all four 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 four proceedings related to the Electric Security Plan of Columbus Southern Power Company and Ohio Power Company (collectively, "AEP Ohio") as one case, the Supreme Court will not recognize the four dockets as one consolidated docket without a formal consolidation

order by the Commission. Without formal consolidation, no single *pro hac vice* attorney can be admitted to all four 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,



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Dated: April 22, 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 and electronic mail upon counsel identified below for all parties of record this 22nd day of April, 2011.



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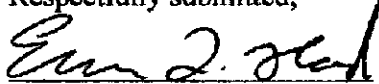
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**MOTION FOR PERMISSION TO APPEAR *PRO HAC VICE*
OF EMMA F. HAND**

Pursuant to Gov.Bar R. XII Section 2(A)(6), Emma F. Hand, attorney for Ormet Primary Aluminum Corporation ("Ormet"), hereby moves the Public Utilities Commission of Ohio to grant her permission to appear *pro hac vice* and participate as counsel in the above proceeding for Ormet, an industrial customer of Columbus Southern Power Company and Ohio Power Company, for the reasons contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,



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emma.hand@snrdenton.com

*Counsel for Ormet Primary Aluminum
Corporation*

Dated: April 22, 2011

The affidavit required by Gov.Bar R. XII Section 2(A)(6), a copy of Movant's certificate of *pro hac vice* registration furnished by the Supreme Court of Ohio Office of Attorney Services, and a certificate indicating service of this Motion on all known parties and attorneys of record are attached. Movant understands that, if this Motion is granted, Movant must file a *Notice of Permission to Appear Pro Hac Vice* and a copy of the Order granting permission with the Supreme Court of Ohio Office of Attorney Services within thirty days of the Order.

Respectfully submitted,



Emma F. Hand (PHV - 1353-2011)

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Counsel for Ormet Primary Aluminum Corporation

Dated: April 22, 2011

THE SUPREME COURT of OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

EMMA FRANCES HAND

FOR PRO HAC VICE REGISTRATION

State of DISTRICT OF COLUMBIA

County of DISTRICT OF COLUMBIA

ss:

AFFIDAVIT OF APPLICANT

Gov. Bar R. XII, Section 2(A)(3)

Emma Frances Hand, being first duly cautioned, swears or affirms as follows:

- a. I have never been disbarred from the practice of law.
- b. I have been admitted to the practice of law in the following jurisdiction(s)
Virginia, District of Columbia
- c. Choose one:
 - ☒ I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice.
 - ☐ I am currently suspended from the practice of law in the following jurisdiction(s):

- d. Choose one:
 - ☒ I have not resigned from the practice of law with discipline pending in any jurisdiction where I have been admitted to practice.
 - ☐ I have resigned from the practice of law with discipline pending in the following jurisdiction(s):

SIGNATURE OF APPLICANT:

Emma F. Hand

Sworn to or affirmed before me and subscribed in my presence the 25th

day of March, 2011

LYNN L. BELLAY

NOTARY PUBLIC

DISTRICT OF COLUMBIA

MY COMMISSION EXPIRES FEB. 28, 2015

Lynn L. Bellay

NOTARY PUBLIC

THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Emma Hand

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Certificate of
PRO HAC VICE
REGISTRATION

2011

Registration Number:
PHV- 1353-2011

Emma Hand

, having met the requirements of, and found to be in full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.

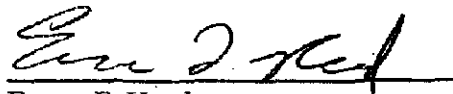


Susan B. Christoff
Director, Attorney Services

Expires December 31, 2011

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion for Permission to Appear Pro Hac Vice* and *Memorandum in Support* were served by U.S. Mail and electronic mail upon counsel identified below for all parties of record this 22nd day of April, 2011.


Emma F. Hand

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mhpeticoff@vorys.com

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of
Columbus Southern Power Company
and Ohio Power Company for Authority
to Establish a Standard Service Offer
Pursuant to Section 4928.143, Revised
Code, in the Form of an Electric
Security Plan.

Case No. 11-348-EL-SSO

**MOTION FOR PERMISSION TO APPEAR *PRO HAC VICE*
OF DOUGLAS G. BONNER**

Pursuant to Gov.Bar R. XII Section 2(A)(6), Douglas G. Bonner, attorney for Ormet Primary Aluminum Corporation ("Ormet"), hereby moves the Public Utilities Commission of Ohio to grant him permission to appear *pro hac vice* and participate as counsel in the above proceeding for Ormet, an industrial customer of Columbus Southern Power Company and Ohio Power Company, for the reasons contained in the memorandum attached hereto and incorporated herein.

Respectfully submitted,



Douglas G. Bonner (PHV - 1363-2011)
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doug.bonner@snrdenton.com

*Counsel for Ormet Primary Aluminum
Corporation*

Dated: April 22, 2011

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of
Columbus Southern Power Company
and Ohio Power Company for Authority
to Establish a Standard Service Offer
Pursuant to Section 4928.143, Revised
Code, in the Form of an Electric
Security Plan.**

Case No. 11-348-EL-SSO

**MEMORANDUM IN SUPPORT OF
MOTION FOR PERMISSION TO APPEAR *PRO HAC VICE*
OF DOUGLAS G. BONNER**

Pursuant to Gov.Bar R. XII Section 2(A)(6), Douglas G. Bonner, attorney for Ormet Primary Aluminum Corporation ("Ormet"), hereby moves the Public Utilities Commission of Ohio to grant him permission to appear *pro hac vice* and participate as counsel in the above proceeding for Ormet, an industrial customer of Columbus Southern Power Company and Ohio Power Company.

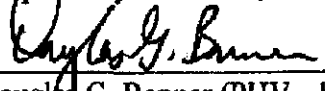
Movant represents that the following is a list of the jurisdictions in which he has ever been licensed to practice law, including dates of admission to practice, resignation, or retirement, and any attorney registration numbers: Florida (#376825; admission date: 11/04/1983); District of Columbia (#384060; admission date: 11/21/1984).

Movant represents that he has not been granted permission to appear *pro hac vice* in more than three proceedings before Ohio tribunals in the current calendar year pursuant to Gov.Bar R. XII Section 2(A)(5).

Keith C. Nusbaum (#0082745), an active Ohio attorney in good standing, has agreed to associate with Movant on this matter.

The affidavit required by Gov.Bar R. XII Section 2(A)(6), a copy of Movant's certificate of *pro hac vice* registration furnished by the Supreme Court of Ohio Office of Attorney Services, and a certificate indicating service of this Motion on all known parties and attorneys of record are attached. Movant understands that, if this Motion is granted, Movant must file a *Notice of Permission to Appear Pro Hac Vice* and a copy of the Order granting permission with the Supreme Court of Ohio Office of Attorney Services within thirty days of the Order.

Respectfully submitted,


Douglas G. Bonner (PHV - 1363-2011)

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doug.bonner@snrdenton.com

Dated: April 22, 2011

THE SUPREME COURT of OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

DOUGLAS G. BONNER

FOR PRO HAC VICE REGISTRATION

AFFIDAVIT OF APPLICANT
Gov. Bar R. XII, Section 2(A)(3)

State of DISTRICT OF COLUMBIA }

County of DISTRICT OF COLUMBIA }

ss:

Douglas G. Bonner, being first duly cautioned, swears or affirms as follows:

- a. I have never been disbarred from the practice of law.
- b. I have been admitted to the practice of law in the following jurisdiction(s)
Florida; District of Columbia
- c. Choose one:
☒ I am not currently suspended from the practice of law in any jurisdiction where I have been admitted to practice.
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☐ I have resigned from the practice of law with discipline pending in the following jurisdiction(s):

SIGNATURE OF APPLICANT:

Douglas G. Bonner

Sworn to or affirmed before me and subscribed in my presence the 29th

day of March, 2011

Lynn L. Bellayr
LYNN L. BELLAYR NOTARY PUBLIC

DISTRICT OF COLUMBIA
MY COMMISSION EXPIRES FEB. 28, 2015

THE SUPREME COURT *of* OHIO

OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Douglas Bonner

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Certificate of
PRO HAC VICE
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2011

Registration Number:

PHV- 1363-2011

Douglas Bonner

, having met the requirements of, and found to be in full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.

Susan B. Christoff

Susan B. Christoff
Director, Attorney Services

Expires December 31, 2011

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion for Permission to Appear Pro Hac Vice* and *Memorandum in Support* were served by U.S. Mail and electronic mail upon counsel identified below for all parties of record this 22nd day of April, 2011.



Emma F. Hand

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FAX TRANSMISSION

DATE • April 22, 2011

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CLIENT/MATTER • 30000460-0002
FROM • Emma F. Hand 202-408-7094

TOTAL NUMBER OF PAGES TRANSMITTED, INCLUDING THIS SHEET: 45

In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan, Case Nos. 11-346-EL-SSO, 11-348-EL-SSO;

In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority, Case Nos. 11-349-EL-AAM, 11-350-EL-AAM;

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

Motion for Permission to Appear Pro Hac Vice of Douglas G. Bonner (4 pages)

Motion for Permission to Appear Pro Hac Vice of Emma F. Hand (4 pages)

Motion of Ormet Primary Aluminum Corporation for Leave to Intervene Out of Time (10 pages) and,

SNR DENTON 

February 22, 2011

Page 2

Motion to Consolidate of Ormet Primary Aluminum Corporation (5 pages)

***Original will follow via FedEx.**

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