

SNR Denton US LLP 1301 K Street, NW Sulte 600, East Tower Washington, DC 20005-3364 USA D +1 202 408 7094

Emma F. Hand Partner emma.hand@snrdenton.com

T +1 202 408 6400 F +1 202 408 6399 sardenton.com

April 22, 2011

BY FACSIMILE & FEDERAL EXPRESS

Public Utilities Commission of Ohio **Docketing Division** 180 East Broad Street Columbus, Ohio 43215-3793 Fax: (614),466,0313

Re:

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;

Dear Sir or Madam:

Enclosed please find an original and ten (10) copies of each of the following filings which were originally filed by facsimile on April 22, 2011:

- (i) Motion for Permission to Appear Pro Hac Vice of Douglas G. Bonner.
- (ii)' Motion for Permission to Appear Pro Hac Vice of Emma Hand;
- (iii) Motion of Ormet Primary Aluminum Corporation for Leave to Intervene Out of Time; and
- (iv) Motion to Consolidate of Ormet Primary Aluminum Corporation

Two additional copies of each document are enclosed to be date-stamped and returned to me in the enclosed, self-addressed Federal Express envelope.

> This is to certify that the images eppearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
>
> Technician Date Processed APR 9 5 2011

Public Utilities Commission of Ohio April 22, 2011 Page 2

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

Sincerely,
En 2. Ken

Emma F. Hand

Partner

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) Case No. 11-346-EL-SSO
Pursuant to Section 4928.143, Revised	· ·
Code, in the Form of an Electric)
Security Plan.)
Socurity I tall.)

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,

Emma F. Hand (PHV - 1353-2011)

SNR Denton US LLP 1301 K Street, NW Suite 600, East Tower Washington, DC 20005-3364 202-408-7094 phone 202-408-6399 fax emma.hand@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) Coss No. 11 246 EU SSO
to Establish a Standard Service Offer) Case No. 11-346-EL-SSO
Pursuant to Section 4928.143, Revised	
Code, in the Form of an Electric)
Security Plan.)
)

MEMORANDUM IN SUPPORT OF 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.

Movant represents that the following is a list of the jurisdictions in which she has ever been licensed to practice law, including dates of admission to practice, resignation, or retirement, and any attorney registration numbers: Virginia (#46272; admission date: 2001); and District of Columbia (#4760001; admission date: 01/11/2002).

Movant represents that she 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,

Emma F. Hand (PHV - 1353-2011)

Business Address: SNR Denton US LLP 1301 K Street, NW Suite 600, East Tower Washington, DC 20005-3364

202-408-7094 phone 202-408-6399 fax

emma.hand@snrdenton.com

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	AFFIDAVIT OF APPLICANT
FOR PRO HAC VICE REGISTRATION	Gov. Bar R. XII, Section 2(A)(3)
State ofDISTRICT OF COLUMBIA)
County ofDISTRICT OF COLUMBIA) ss:)
Emma Frances Hand	being first duly cautioned, swears or affirms as
follows:	
a. I have never been disbarred from the pract	ice of law.
b. I have been admitted to the practice of law Virginia, D	in the following jurisdiction(s) istrict of Columbia
c. Choose one: I am not currently suspended from the been admitted to practice.	practice of law in any jurisdiction where I have
I am currently suspended from the practice of	ctice of law in the following jurisdiction(s):
d. Choose one: I have not resigned from the practice o where I have been admitted to practice	f law with discipline pending in any jurisdiction
I have resigned from the practice of law jurisdiction(s):	w with discipline pending in the following
	SIGNATURE OF APPLICANT:
Sworn to or affirmed before me and subscribed	i in my presence the 25th
LYNN L BELLAYR 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

Certificate of PRO HAC VICE

REGISTRATION

2011

Emma Hand

FOR PRO HAC VICE REGISTRATION

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

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

SERVICE LIST

City of Hilliard, Ohio Christopher L. Miller Pamela A. Fox Gregory H. Dunn Asim Z. Haque Schottenstein Zox & Dunn Co., LPA 250 West Street Columbus, OH 43215 Wal-Mart Stores East, LP Sam's East, Inc. Kenneth Kreider Keating Muething & Klekamp PLL One East Fourth Street Suite 1400 Cincinnati, OH 45202

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

Wal-Mart Stores East, LP Sam's East, Inc. Holly Rachel Smith, PLLC Hitt Business Center 3803 Rectortown Road Marshall, VA 20115

Sierra Club Natural Resources Defense Counsel Henry W. Eckhart Shannon Fisk 1200 Chambers Road, Ste. 106 Columbus, OH 43212 Wal-Mart Stores East, LP Sam's East, Inc. Steve W. Chriss Wal-Mart Stores, Inc. 2001 SE 10th Street Bentonville, AR 721716 American Electric Power Service Corporation Jay E. Jadwin 1 Riverside Plaza, 29th Floor Columbus, OH 43215 Industrial Energy Users-Ohio Samuel C. Randazzo Joseph E. Oliker Frank P. Darr McNees Wallace & Nurick LLC 21 East State Street, 17th Fl Columbus, OH 43215

Columbus Southern Power Company & Ohio Power Company Steven T. Nourse Matthew J. Satterwhite American Electric Power 1 Riverside Plaza, 29th Floor Columbus, OH 43215

Exelon Generation Company, LLC Jesse A. Rodriguez 300 Exelon Way Kennett Square, PA 19348

Columbus Southern Power Company & Ohio Power Company Daniel R. Conway Porter Wright Morris & Arthur Huntington Center 41 S. High Street Columbus, OH 43215

Exelon Generation Company, LLC Constance Whyte Reinhard Exelon Business Services Company 10 S. Dearborn Street Chicago, IL 60603

Environmental Law & Policy Center Tara C. Santarelli 1207 Grandview Ave., Ste. 201 Columbus, OH 43212 tsantarelli@elpc.com Exelon Generation Company, LLC Sandy I. Grace Exelon Business Services Company 101 Constitution Avenue, N.W. Suite 400 East Washington, DC 20001 OMA Energy Group Lisa G. McAlister Matthew W. Warnock Bricker & Eckler, LLP 100 South Third Street Columbus, OH 43215-4291 The Ohio Energy Group David F. Boehm Michael L. Kurtz Boehm Kurtz & Lowry 36 East Seventh Street Suite 1510 Cincinnati, OH 45202

Ohio Environmental Council E. Camille Yancey Nolan Moser Trent A. Dougherty 1207 Grandview Ave., Ste 201 Columbus, OH 43212 Distributed Wind Energy Association Terrence O'Donnell Christopher Montgomery Bricker & Eckler LLP 100 South Third Street Columbus, OH 43215

Retail Energy Supply Association Stephen Howard M. Howard Petricoff Vorys, Sater, Seymour and Pease LLP 52 E. Gay Street P.O. Box 1008 Columbus, OH 43216 mhpetricoff@vorys.com

Ohio Partners for Affordable Energy Colleen Mooney 231 West Lima Street Findlay, OH 45840

Ohio Hospital Association Richard L. Sites 155 East Broad Street, 15th Floor Columbus, OH 43215 Association of Independent Colleges & Universities of Ohio Christopher L. Miller C. Todd Jones Gregory H. Dunn Asim Z. Haque Schottenstein, Zox and Dunn Co LPA 250 West Street Columbus, OH 43215

Ohio Hospital Association Thomas J. O'Brien Bricker & Eckler LLP 100 South Third Street Columbus, OH 43215 COMPETE Coalition
William L. Massey
Covington & Burling LLP
1201 Pennsylvania Ave., NW
Washington, DC 20004

Constellation New Energy, Inc. & Constellation Energy Commodities Group, Inc.
M. Howard Petricoff
Michael J. Settineri
Vorys Sater Seymour and Pease LLP
52 East Gay Street
P.O. Box 1008
Columbus, OH 43216-1008
mhpetricoff@vorys.com

COMPETE Coalition
M. Howard Petricoff
Michael J. Settineri
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
P.O. Box 1008
Columbus, OH 43216-1008
mhpetricoff@vorys.com

Dominion Retail Inc. Gary A. Jeffries 501 Martindale Street Ste. 400 Pittsburgh, PA 15212 Dominion Retail, Inc.
Barth E. Royer
Bell & Royer Co LPA
33 South Grant Avenue
Columbus, OH 43215-3927

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

Duke Energy Retail Services, LLC Amy B. Spiller Dorothy K. Corbett 139 E Forth Street 1303-Main Cincinnati, OH 45202 FirstEnergy Solutions Corp. Mark A. Hayden FirstEnergy Service Company 76 South Main Street Akron, OH 44308 haydenm.@firstenergycorp.com Paulding Wind Farm II LLC Terrence O'Donnell Christopher Montgomery Bricker & Eckler LLP 100 South Third Street Columbus, OH 43215

The Kroger Co.
John W. Bentine
Mark Yurick
Chester Wilcox & Saxbe LLP
65 E State Street
Suite 1000
Columbus, OH 43215
myurick@cwslaw.com

The PJM Power Providers Group Glen Thomas 1060 First Avenue, Ste. 400 King of Prussia, PA 19406

City of Grove City, Ohio Gregory H. Dunn Stephen J. Smith Christopher L. Miller Asim Z. Haque Schottenstein Zox & Dunn Co., LPA 250 West Street Columbus, OH 43215

The PJM Power Providers Group Laura Chapelle 4218 Jacob Meadows Okemos, MI 48864

Office of the Ohio Consumers' Counsel Terry L. Etter Michael E. Idzkowski Maureen R. Grady 10 W Broad Street Suite 1800 Columbus, OH 43215 The PJM Power Providers Group Stephen M. Howard, Attorney M. Howard Petricoff 52 East Gay Street P.O. Box 1008 Columbus, OH 43216 mhpetricoff@vorys.com