

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
Columbus Southern Power Company)
and Ohio Power Company to Adjust)
Their Economic Development Cost)
Recovery Rider Rates.)

Case No. 11-4570-EL-RDR

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**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT
OF GLOBE METALLURGICAL, INC.**

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August 2, 2011

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MOTION TO INTERVENE

Globe Metallurgical, Inc. ("Globe") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Section 4903.221, Revised Code, and Rule 4901-1-11, Ohio Administrative Code ("O.A.C."), for leave to intervene in the above-captioned matter with the full powers and rights granted by the Commission, specifically by statute or by the provisions of the O.A.C., to intervening parties.

On August 1, 2011, Ohio Power Company ("OP") filed an Application to adjust its economic development cost recovery rider ("Rider EDR"), which included Globe-specific information filed under seal.

As demonstrated further in the Memorandum in Support, attached hereto and incorporated herein, Globe has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding, and is so situated that the disposition of these proceedings may, as a practical matter, impair or impede its ability to protect that interest. Globe believes that its participation will not unduly prolong or delay this proceeding and that it will significantly contribute to the full development and equitable resolution of the factual and other issues in this proceeding. The interests of Globe will not be adequately represented by other parties to the proceeding and, as

such, Globe is entitled to intervene with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the O.A.C., to intervening parties.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

In support of this Motion to Intervene, Globe states that it is a mercantile customer currently taking service from OP pursuant to a Commission-approved reasonable arrangement. As a result, the economic development amounts that OP seeks to recover through its EDR, which it is updating through its filing, are generated by Globe's reasonable arrangement, among others.

Given that Globe's customer-specific information is being used by OP to support its requested EDR update, Globe may be affected by OP's proposed changes to its Rider EDR rates. This potential vests Globe with a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding, the disposition of which may impair or impede its ability to protect that interest.

For the aforementioned reasons, Globe has a direct, real, and substantial interest in the issues and matters involved in the above-captioned proceeding that will only be protected by its participation in this proceeding. Therefore, Globe hereby requests that the Commission grant its intervention with the full powers and rights granted by the Commission, specifically by statute and by the provisions of the O.A.C., to intervening parties.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support of Globe Metallurgical, Inc.* was served upon the following parties of record this 2nd Day of August 2011, via first class mail, postage prepaid.



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**ON BEHALF OF COLUMBUS SOUTHERN
POWER AND OHIO POWER COMPANY**