

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application)	
of Ohio Power Company to Adjust Its)	
Economic Development Cost)	Case No. 12-688-EL-RDR
Recovery Rider Rates Pursuant to)	
Rule 4901:1-38-08(A)(5) of the Ohio)	
Administrative Code)	

**MOTION TO INTERVENE AND MEMORANDUM IN SUPPORT
OF ERAMET MARIETTA, INC.**

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February 24, 2012

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In the Matter of the Application)	
of Ohio Power Company to Adjust Its)	
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MOTION TO INTERVENE

Eramet Marietta, Inc. ("Eramet") 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 February 22, 2012, Ohio Power Company ("OP") filed an Application to adjust its economic development cost recovery rider ("EDR"), which included Eramet-specific information filed under seal.

As demonstrated further in the Memorandum in Support, attached hereto and incorporated herein, Eramet 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. Eramet 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 Eramet will not be adequately represented by other parties to the proceeding and, as

such, Eramet 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,

/s/ Matthew R. Pritchard

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Power Company to Adjust Its Economic Development Cost Recovery Rider Rates Pursuant to Rule 4901:1-38-08(A)(5) of the Ohio Administrative Code))))))	Case No. 12-688-EL-RDR
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MEMORANDUM IN SUPPORT

In support of this Motion to Intervene, Eramet 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 Eramet's reasonable arrangement, among others.

Given that Eramet's customer-specific information is being used by OP to support its requested EDR update, Eramet may be affected by OP's proposed changes to its EDR rates. This potential vests Eramet 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, Eramet 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, Eramet 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,

/s/ Matthew R. Pritchard

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion to Intervene and Memorandum in Support of Eramet Marietta, Inc.* was served upon the following parties of record this 24th Day of February 2012, via first class mail, postage prepaid.

/s/ Matthew R. Pritchard

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ON BEHALF OF OHIO POWER COMPANY

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Summary: Motion to Intervene electronically filed by Mr. Matthew R. Pritchard on behalf of Eramet Marietta, Inc.