

Respectfully submitted on behalf of
THE OMA ENERGY GROUP



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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ormet Primary Aluminum Corporation for Approval of a Unique Arrangement with Ohio Power Company)) Case No. 09-119 -EL-AEC

MEMORANDUM IN SUPPORT

On June 14, 2013, Ormet filed a Motion with the Commission requesting approval to amend its existing Unique Arrangement with Ohio Power Company (“AEP-Ohio”).¹ If approved, this will be the second time since its adoption that the Unique Arrangement has been modified.² This requested modification stands to directly impact the OMAEG and its members.

The OMAEG is a non-profit entity created by the Ohio Manufacturers’ Association for the purpose of educating and providing information to energy consumers, regulatory boards and suppliers of energy; advancing energy policies to promote adequate, reliable and efficient supply of energy at reasonable prices; and, advocating on behalf of Ohio manufacturers in critical cases before the Commission. The OMAEG should be permitted to intervene because Ormet’s requested modification represents a substantial and extraordinary departure from the originally adopted Unique Arrangement. Moreover, this second modification will directly impact OMAEG members which purchase electric service from AEP-Ohio.

¹ Ormet’s Motion to Amend the 2009 Unique Arrangement between Ohio Power Company and Ormet Primary Aluminum Corporation and Request for Emergency Relief, filed on June 14, 2013.

² The Unique Arrangement was initially forged between Ormet and AEP-Ohio on July 15, 2009. Ormet’s first request to amend the Unique Arrangement was approved by the Commission on October 16, 2012.

Consistent with the requirements of R.C. 4903.221, and OAC Rule 4901-1-11(B), the OMAEG submits that: it is a real party in interest herein; its interest is not now represented, or adequately addressed, by existing parties; it will contribute to the just and expeditious resolution of the issues and concerns set forth in this proceeding; and its participation in this proceeding will not cause undue delay or unjustly prejudice any existing party. The OMAEG's participation will enhance the effectiveness of the above proceeding, and ensure that the proceeding is fair to its membership.

Accordingly, the OMAEG respectfully requests the Commission grant its Motion to Intervene pursuant to R.C. 4903.221 and OAC Rule 4901-1-11.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion to Intervene was served upon the parties of record listed below this 5th day of July 2013 via electronic mail.



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Summary: Motion to Intervene of OMA Energy Group and Memorandum in Support electronically filed by Teresa Orahoad on behalf of J. Thomas Siwo