

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Power Company to Adjust The Economic)	Case No. 18-1256-EL-RDR
Development Cost Recovery Rider Rate)	

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

Globe Metallurgical Inc. ("Globe") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to R.C. Section 4903.221, and Ohio Adm. Code Rules 4901-1-11 and 4901:1-38-08(C), 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 administrative code, to intervening parties. On August 3, 2018, Ohio Power Company ("AEP-Ohio") filed an Application to adjust its Economic Development Cost Recovery rider ("EDR") rate, 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 this proceeding 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. Globe's interests 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 administrative rules, to intervening parties.

Respectfully submitted,

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**MEMORANDUM IN SUPPORT
OF THE MOTION TO INTERVENE**

In support of this Motion to Intervene, Globe states that it is a mercantile customer that is and has been taking service from AEP Ohio pursuant to Commission-approved unique arrangements.¹ As a result, the economic development amounts that AEP Ohio seeks to recover through its EDR, which is being updated through this proceeding, are generated by Globe's reasonable arrangement, among others.

Globe's confidential customer-specific information is being used by AEP Ohio to support its requested EDR update.² As well, Globe may be affected by AEP Ohio's proposed changes to its EDR rate. Globe thus has 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. This proceeding will not be prolonged or unduly delayed by Globe's

¹ *In re Application of Globe Metallurgical, Inc. for Approval of a Unique Arrangement Between Ohio Power Company and Globe Metallurgical, Inc.*, Case No. 16-737-EL-AEC, Opinion and Order at ¶ 12, 21 (Oct. 26, 2016) (approving unique arrangement effective October 1, 2016 through December 31, 2018). *See also In re Application of Globe Metallurgical, Inc. for Approval of a Unique Arrangement Between Ohio Power Company and Globe Metallurgical, Inc.*, Case No. 15-327-EL-AEC, Opinion and Order at 6 (May 13, 2015) (extending unique arrangement through May 31, 2016); *id.*, Finding and Order at ¶ 7, 9 (May 25, 2016) (extending unique arrangement through June 30, 2016); *id.*, Finding and Order at ¶ 9, 11 (June 29, 2016) (extending unique arrangement through September 30, 2016).

² *See In re Application of Ohio Power Company to Adjust The Economic Development Cost Recovery Rider Rate*, Case No. 18-0191-EL-RDR, Application at Schedules 2 (reflecting actual and estimated monthly delta revenue amounts) and 4 (reflecting actual estimated monthly electric usage and bill information, discounts, and delta revenues) (Aug. 3, 2018).

intervention. For these same reasons, Globe has been permitted to intervene in prior proceedings involving AEP Ohio's economic development calculations.³

Given Globe's 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, 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 administrative code, to intervening parties.

Respectfully submitted,

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³ See, e.g., *In re Application of Ohio Power Company to Adjust The Economic Development Cost Recovery Rider Rate*, Case No. 18-0191-EL-RDR, Finding and Order at ¶13 (March 28, 2018); *In re Application of Ohio Power Company to Adjust its Economic Development Cost Recovery Rider Rate*, Case No. 17-1714-EL-RDR, Finding and Order at 4 (Sep. 13, 2017); *In re Application of Ohio Power Company to Adjust its Economic Development Cost Recovery Rider Rate*, Case No. 17-0295-EL-RDR, Finding and Order at 4 (Mar. 29, 2017); *In re Application of Ohio Power Company to Adjust the Economic Development Cost Recovery Rider Rate*, Case No. 16-1684-EL-RDR, Finding and Order at 4 (Sept. 22, 2016); *In re Application of Ohio Power Company to Adjust the Economic Development Cost Recovery Rider Rate*, Case No. 16-260-EL-RDR, Finding and Order at 4 (Mar. 31, 2016); *In re Application of Ohio Power Company to Adjust Its Economic Development Rider Rate*, Case No. 15-1400-EL-RDR, Finding and Order at 4 (Nov. 18, 2015); *In re Application of Ohio Power Company to Adjust Its Economic Development Rider Rate*, Case No. 15-279-EL-RDR, Finding and Order at 4 (Mar. 8, 2015); *In re Application of Ohio Power Company to Adjust Its Economic Development Rider Rate*, Case No. 14-1329-EL-RDR, Finding and Order at 4 (Sept. 17, 2014); *In re Application of Ohio Power Company to Adjust the Economic Development Cost Recovery Rider Rate*, Case No. 13-1739-EL-RDR, Entry at ¶ 5 (Dec. 08, 2014); *In re Application of Ohio Power Company to Adjust the Economic Development Cost Recovery Rider Rate*, Case No. 13-0325-EL-RDR, Finding and Order at 4 (Mar. 27, 2013); *In re Application of Ohio Power Company to Adjust Its Economic Development Cost Recovery Rider Pursuant to Rule 4901:1-36-08(A)(5), Ohio Administrative Code*, Case No. 12-2210-EL-RDR, Finding and Order at 4-5 (Sept. 26, 2012); *In re Application of Ohio Power Company to Adjust Its Economic Development Cost Recovery Rider Pursuant to Rule 4901:1-38-08(A)(5), Ohio Administrative Code*, Case No. 12-688-EL-RDR, Finding and Order at 4-5 (Mar. 28, 2012); and *In re Application of Columbus Southern Power Company and Ohio Power Company to Adjust Their Economic Development Cost Recovery Rider Pursuant to Rule 4901:1-38-08(A)(5), Ohio Administrative Code*, Case No. 11-4570-EL-RDR, Finding and Order at 4 (Oct. 12, 2011).

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 23rd day of August 2018 upon all persons/entities listed below:

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Summary: Motion Motion to Intervene and Memorandum in Support electronically filed by Mrs. Gretchen L. Petrucci on behalf of Globe Metallurgical Inc.