

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of)	
Republic Steel,)	
)	
Complainant,)	Case No. 17-2115-EL-CSS
)	
v.)	
)	
Ohio Power Company d/b/a AEP Ohio,)	
)	
Respondent.)	

JOINT MOTION TO DISMISS

Pursuant to Rule 4901-1-12 of the Ohio Administrative Code, Republic Steel (Republic) and Ohio Power Company, d/b/a AEP Ohio (AEP Ohio) (collectively, Parties), jointly move the Public Utilities Commission of Ohio (Commission) to dismiss, with prejudice, the Complaint filed on October 11, 2017 by Republic regarding security deposits that AEP Ohio assessed to Republic's 8th Street Plant on October 3, 2016 and March 1, 2017 and Republic's Cast Roll Plant on February 2, 2017 and April 3, 2017. The joint dismissal is subject to the elimination of the deposits and associated late fees on both of Republic's electric service accounts with AEP Ohio and the appropriate accounting of such. The Parties also expressly reserve their rights to challenge or initiate any future application or assessment of security deposits and/or late fees to Republic's electric service accounts. The reasons for the motion are set forth in the attached memorandum in support.

WHEREFORE, the Parties respectfully request that the Commission issue an Entry dismissing the Complaint with prejudice and subject to the Parties full compliance with the terms specified herein.

Respectfully submitted,

/s/ Kimberly W. Bojko

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MEMORANDUM IN SUPPORT

Republic initiated the Complaint before the Commission on October 11, 2017, challenging the assessment of security deposits by AEP Ohio against Republic's 8th Street Plant on October 3, 2016 and March 1, 2017 and against Republic's Cast Roll Plant on February 2, 2017 and April 3, 2017. The Parties state that the issues raised in the Complaint regarding the afore-mentioned security deposits have been resolved subject to the completion of appropriate accounting to eliminate the deposits and associated late fees from both of Republic's electric service accounts with AEP Ohio. The Parties, however, expressly reserve their rights to challenge or initiate any future application or assessment of security deposits and/or late fees to Republic's electric service accounts.

Accordingly, Republic and AEP Ohio jointly request that the Commission dismiss the Complaint with prejudice and subject to the Parties full compliance with the terms specified herein.

Respectfully submitted,

/s/ Kimberly W. Bojko

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Summary: Motion Joint Motion to Dismiss electronically filed by Mrs. Kimberly W. Bojko on behalf of Republic Steel