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OF COUNSEL:
IRVING S. BERGRIN

February 9, 2007

PUCO
Docketing Division
180 E. Broad Street
Columbus, OH 43215-3793

RE: SG Foods, Inc., et al. v. Cleveland Electric Illuminating Co., et al.

To Whom It May Concern:

Enclosed please find an original and eleven copies of the RESPONSE TO MOTION TO COMPEL along with SG FOODS, INC. ANSWER TO RESPONDENTS' FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS, regarding the above-captioned matter.

Please accept for filing and return a time-stamped copy to my attention in the self-addressed stamped envelope provided for your convenience. Thank you.

Very truly yours,


Edward F. Siegel

EFS/le
Enc.

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FILE

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

RECEIVED-DOCKETING DIV
2007 FEB 13 AM 11:07
PUCO

In the Matter of the Complaints of S.G.
Foods, Inc., et al.; Miles Management Corp.,
et al.; Allianz US Global Risk Insurance
Company, et al.; Lexington Insurance
Company, et al.; and BMW Pizza, Inc. and
DPNY, Inc., et al.,

Complainants,

v.

The Cleveland Electric Illuminating
Company, Ohio Edison Company,
Toledo Edison Company, and
American Transmission Systems, Inc.

Respondents,

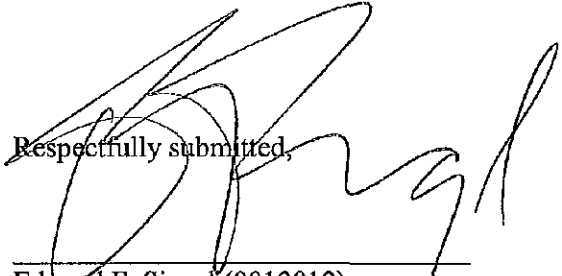
Case Nos.: 04-28-EL-CSS
05-803-EL-CSS
05-1011-EL-CSS
05-1012-EL-CSS
05-1014-EL-CSS

RESPONSE TO MOTION TO COMPEL

Now comes the Complainant, S.G. Foods, Inc., by and through counsel, and responds to the Motion to Compel as follows:

Attached hereto please find copies of Answers to Interrogatories and Request for Production of Documents which were sent today to counsel for Respondent. The filing of such Answers has mooted the Motion to Compel.

Respectfully submitted,

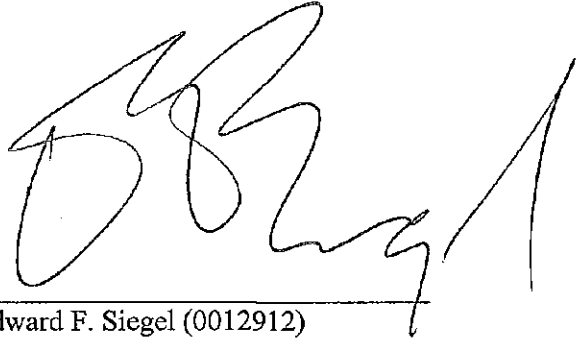


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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing **Response of Complainant** was sent to the
following on February 1, 2007:

David A. Kutik
Mark A. Whitt
JONES DAY
North Point
901 Lakeside Ave.
Cleveland, OH 44114

A handwritten signature in black ink, appearing to read 'E. Siegel', written over a horizontal line.

Edward F. Siegel (0012912)