

FILE

**Before
The Public Utilities Commission of Ohio**

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In the Matter of the Application)
of Ohio Edison Company, the)
Cleveland Electric Illuminating)
Company and the Toledo Edison)
Company for Authority to)
Establish a Standard Service)
Offer Pursuant to ORC Section)
4920.143 in the Form of an)
Electric Security Plan)

Case No. 08-935-EL-SSO

**Responses of the Ohio Farm Bureau Federation to First Sets
of Interrogatories and Request for Production of Documents
of the FirstEnergy Companies**

Pursuant to Rules 4901-1-16, 4901-1-19, and 4901-1-20 of the Ohio Administrative Code, and the attorney examiner's entries in the above dockets of August 5, 2008 and August 7, 2008, respectively, the Ohio Farm Bureau Federation (OFBF) hereby provides the following responses to the FirstEnergy Companies' First Sets of Interrogatories and Requests for Production of Documents concerning Case No. 08-935-EL-SSO as docketed with the Commission on September 4, 2008.

INTERROGATORIES

INTERROGATORY NO. 1: Identify each person whom You intend to call as a witness at the hearing in this Case.

RESPONSE: Although OFBF anticipates calling one or more witnesses in Case No. 08-935-EL-SSO, it has not yet determined the person(s) that will be called. OFBF will supplement this response when that determination is made.

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INTERROGATORY NO. 2: For each person whom You intend to call as a witness at the hearing in this Case:

- a. State the substance of each opinion on which the witness will testify;
- b. State all facts which provide the basis for each opinion on which the witness will testify;
- c. Provide a summary of the witness's background and qualifications;
- d. Identify each document supplied to, reviewed by, relied on, or prepared by the witness in connection with his or her testimony in this Case; and
- e. Identify by caption, agency or court, case name, and case number all other proceedings in which the witness has testified on the same or a similar topic in the past ten years.

RESPONSE: With respect to Case No. 08-935-EL-SSO, please see Response to Interrogatory No. 1. OFBF will supplement this response when it determines which person(s) it will call as a witness.

INTERROGATORY NO. 3: Identify each and every document, exhibit or other thing You intend to introduce into evidence or otherwise display at the hearing in this Case.

RESPONSE: Other than the testimony of the witness or witnesses it ultimately calls, OFBF has not yet determined whether it will introduce into evidence or otherwise display any documents, exhibits, of other things at the hearing in Case No. 08-935-EL-SSO. OFBF will supplement this response when such determination is made.

INTERROGATORY NO. 4: Identify each and every adjustment, modification, or change to any proposal contained in the FirstEnergy Companies' Application in this Case that You propose or support or intend to propose or support.

RESPONSE: OFBF has not yet made a final determination with respect to these matters, but anticipates that it will propose in Case No. 08-935-EL-SSO support or modifications

relating to determination of AMI, Smart Grid, Energy Efficiency, Demand Response, Economic Development, Job Retention Initiatives. OFBF will supplement this response when such final determination is made.

INTERROGATORY NO. 5: For any and all adjustments, modifications, or changes described in Your response to Interrogatory No. 4, Identify the following:

- a. All facts relied on by You that support the proposed adjustment, modification or change.
- b. All documents referring to, reflecting, or relating to the adjustment, modification or change.

RESPONSE: See response to Interrogatory No. 4. OFBF will supplement this response when the final determination described in said response is made.

INTERROGATORY NO. 6: Identify all communications concerning the FirstEnergy Companies' application, schedules, or proposals in this Case that You have had with any party or any representative of any party to this Case or any third party.

RESPONSE: OFBF personnel have had several limited telephone and/or direct conversations with personnel of the Office of the Ohio Consumers' Counsel during which the proposals contained in the application in Case No. 08-935-EL-SSO were mentioned and/or briefly discussed in general terms.

INTERROGATORY NO. 7: Identify all internal communications (including but not limited to communications involving Your consultants) concerning the FirstEnergy Companies' application, schedules, or proposals in this Case.

RESPONSE: With the exception of internal communications concerning the preparation of this document, OFBF has generated no further internal communications concerning FirstEnergy Companies' applications, schedules and/or proposals in this case. As of this filing, OFBF has not hired any outside consultants concerning this matter. Moreover, if and

when to the extent that this interrogatory would require disclosure of communications with in-house or outside OEC counsel, discovery is barred by the attorney-client privilege or protected as attorney work product.

INTERROGATORY NO. 8: Identify all documents You have generated, produced, or distributed (including but not limited to documents generated or produced by Your consultants) concerning the FirstEnergy Companies' application, schedules, or proposals in this Case.

RESPONSE: See Response to Interrogatory No. 7.

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1: All documents and things identified in response to the FirstEnergy Companies' First Set of Interrogatories.

RESPONSE: See Response to Interrogatory Nos. 7 and 8.

REQUEST FOR PRODUCTION NO. 2: All documents and things that reflect, refer to, or relate to any communication identified in response to the FirstEnergy Companies' First Set of Interrogatories.

RESPONSE: See Response to Interrogatory Nos. 7 and 8.

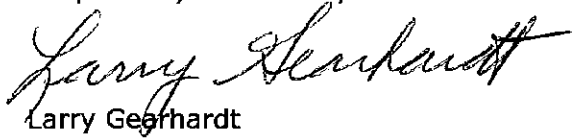
REQUEST FOR PRODUCTION NO. 3: A curriculum vitae for each witness.

RESPONSE: See response to Interrogatory No. 1. OFBF will provide the requested document(s) when it determines which person(s) it will call as a witness.

REQUEST FOR PRODUCTION NO. 4: All exhibits You intend to introduce at hearing.

RESPONSE: See Response to Interrogatory No. 3.

Respectfully Submitted,

A handwritten signature in black ink, reading "Larry Gearhardt". The signature is fluid and cursive, with a long horizontal stroke at the end.

Larry Gearhardt

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been served upon the following parties by first class mail, postage prepaid, and/or by electronic mail this 15th day of September 2008.


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