

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of :
Columbus Southern Power Company for :
Approval of its Electric Security Plan; an : Case No. 08-917-EL-SSO
Amendment to its Corporate Separation :
Plan; and the Sale or Transfer of Certain :
Generation Assets. :

In the Matter of the Application of Ohio :
Power Company for Approval of its : Case No. 08-0918-EL-SSO
Electric Security Plan; and an Amendment :
To its Corporate Separation Plan. :

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THE SIERRA CLUB, OHIO CHAPTER RESPONSES TO
COLUMBUS SOUTHER POWER COMPANY'S AND OHIO POWER COMPANY'S FIRST SET OF
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO THE SIERRA CLUB

The Sierra Club, Ohio Chapter ("Sierra Club") hereby submits its Responses to the First Set of Interrogatories and Request for Production of Documents in the above captioned case submitted to it on September 12, 2008.

The Sierra Club has attempted to be responsive to each and every one of the requests submitted by the Columbus Southern Power Company's and the Ohio Power Company's ("AEP"). However, our responses to these interrogatories are being provided without waiver of several objections which are stated as part of our responses below. The Sierra Club is working diligently to thoroughly examine the application and testimony of the AEP companies, and to review each of the discovery requests and responses that have been submitted. At this time, for example, we have not determined the substance of each opinion on which any possible of our witness will testify. Moreover, we reserve the right to submit testimony on behalf of additional witnesses we cannot yet identify. With

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these caveats in mind, and in the spirit of working cooperatively in these proceeding, we have provided all currently available information that is responsive to the AEP companies' requests.

GENERAL OBJECTIONS

1. Sierra Club objects to data requests that expand Sierra Club's obligations beyond those in the rules of discovery contained in the Ohio Administrative Code, section 4901-1-16(B).
2. Sierra Club objects to data requests that would seek to require disclosure of information or communications protected by attorney-client privilege or other applicable privilege.

INTERROGATORIES

INTERROGATORY NO. 1: For each consultant that The Sierra Club retains for this proceeding, please describe in detail the scope of the consultant's engagement, including the subject matters, issues, and positions regarding which the consultant will analyze and advise Sierra Club. If Sierra Club has not yet determined a particular subject matter, issue, or position regarding which the consultant will analyze and advise Sierra Club, please promptly provide a description as soon as you have determined it.

RESPONSE: Objection. The Sierra Club has no witnesses scheduled for the above named cases. We reserve the right to introduce witnesses in a timely manner as these case progress if our interests will be served by doing so.

INTERROGATORY NO. 2. Please Identify each witness the Sierra Club will present at the hearing for the Companies ESP proceeding. To the extent that Sierra Club does not know yet who all the witnesses are that it will present at the hearing, please promptly identify each witness as soon as Sierra Club does determine that it will present the witness at the hearing.

RESPONSE NO. 2. Objection. Again, Sierra is currently in the process of analyzing the AEP Companies application and testimony in the above captioned cases. Sierra Club has not yet

determined who will testify at the hearing, if any, but will promptly identify each witness as soon as that determination has been made.

INTERROGATORY NO. 3: For each witness that Sierra Club identifies in responses to the previous Interrogatory, please describe in detail the expected scope and purpose of the witness's testimony, including the subject matters, issues, and positions regarding which the witness will present testimony on behalf of Sierra Club. If Sierra Club has not yet identified a particular witness that it will present at the hearing, or if Sierra Club has not yet determined the particular subject matter, issue, or position regarding which the witness will present testimony on behalf of Sierra Club, please promptly provide a description as soon as you identified it.

RESPONSE: Objection. See Response to Interrogatory No. 2. Further, we feel this request is overly broad and general, and would expect any testimony we offer to be fully supported and self-explanatory, if we were offering any in this case at this time. The Sierra Club has no witnesses at this time planning to testify in the above named cases. We reserve the right to introduce a witness in a timely manner as these cases progress if our interests will be served by doing so.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Provide a copy of each document identified or referenced to in your responses to Interrogatories 1-3.

RESPONSE: Objection. See Responses to Interrogatories 1-3

3. Please provide copies of Sierra Club's responses to data request that any other party submits to Sierra Club. This request is continuing.

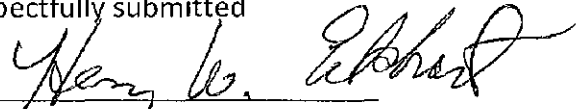
RESPONSE: Objection. No other party has submitted a data request to Sierra Club at this time. We will serve AEP with any appropriate responses we produce, should such a request occur.

4. For each witness identified in response to Interrogatory No. 2, please provide copies of all workpapers and other backup documentations supporting the testimony of each witness that testifies on behalf of NRDC. Each workpaper should be identified in a manner that links it to the particular witness's testimony that the workpaper supports and to the particular issue addressed by, or to the specific/exhibit attached to, that witness's testimony. Please provide the workpapers by no later than the time the testimony is filed.

RESPONSE: Objection. See RESPONSE TO Interrogatory No. 2.

Note: the above responses were provided by Ned Ford of the Cincinnati Office of the Sierra Club, Ohio Chapter. The Objections are by Henry W. Eckhart, as attorney for the Sierra Club.

Respectfully submitted



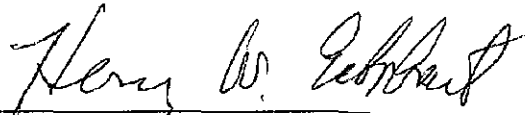
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CERTIFICATE OF SERVICE

I hereby certify that a copy of The Sierra Club's Responses were served by E-mail on the following counsel by E-mail on the 22nd day of September, 2008.

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