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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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PUCO

In the Matter of the Application of Columbus :
Southern Power Company for Approval of its :
Electric Security Plan, Including Related :
Accounting Authority; an Amendment to its : Case No. 08-917-EL-SSO
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 Electric Security : Case No. 08-918-EL-SSO
Plan Including Related Accounting Authority; :
and an Amendment to its Corporate Separate Plan :

THE OHIO MANUFACTURERS' ASSOCIATION
RESPONSE TO COLUMBUS SOUTHERN POWER COMPANY'S
AND OHIO POWER COMPANY'S
FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

Columbus Southern Power Company ("SCP") and Ohio Power Company ("OP") (collectively, "the Companies" or "AEP Ohio") submit the following discovery requests to the Ohio Manufacturers' Association ("OMA") to be answered as provided by the rules of the Public Utilities Commission of Ohio ("PUCO"), O.A.C. 4901-1-19 and 20. In particular, as to each interrogatory, indicate the name(s) of the person(s) responsible for the answer. You are also requested to supplement your responses in accordance with the requirements of O.A.C. 4901-1-16 (C) and (E). Your responses to these requests should be delivered via E-Mail and/or hand delivery to Marvin I. Resnik, AEP Service Corporation, 1 Riverside Plaza, Columbus, Ohio 43215, E-Mail: miresnik@aep.com, Steven T. Nourse, AEP Service Corporation, 1 Riverside Plaza, Ohio 43215, E-Mail: stnourse@aep.com; and Daniel R. Conway, Porter, Wright, Morris & Arthur, LLP, 41 S. High

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st., Columbus, Ohio 43215, E-Mail: dconway@porterwright.com, within ten (10) days of receipt by you, that is, by no later than September 22, 2008, in accordance with Attorney Examiner's Entry issued August 5, 2008.

For purposes of these requests, the following definitions apply:

1. **"Identify" or "Identity"** means to state or a statement of:
 - a) in the case of a person other than a natural person, its name, the address of its principal place of business, and its telephone number.
 - b) in the case of a natural person, his or her name, business address and telephone number, employer, title or position, duties, obligations or responsibilities, and date of separation from your organization or company, if applicable; and
 - c) in the case of a communication, its date, type (e.g., telephone conversation, letter or meeting), the place where it occurred, the identity of each person who received or made the communication or who was present when it was received or made, and the subject matter discussed.
2. **"Electric Security Plan ("ESP") proceeding"** means the matters captioned above.
3. **"You" or "yours"** means OMA, as well as any of its agents, legal representatives, consultants, experts, all representatives and other persons acting on its behalf, and its present and former employees.
4. **"Person"** means any natural person, corporation, firm, company, sole proprietorship, partnership, joint venture, association, institute, or other business or legal entity and all present and former directors, officers, employees, agents, consultants or other persons acting for or on behalf of any such person.

5. **“Document”** includes any written or graphic material, however produced or reproduced, including, but not limited to: prepared speeches, articles, papers, treatises, books, memoranda or white papers, correspondence, or other written, typed, or printed communications, notes in any form, voice recording tapes, videotapes, microfilms, microfiche, pictures, data processing cards or disks, computer generated or stored information or data bases, now or previously in your possession. If a document has been destroyed or is otherwise unavailable, such should be indicated in the response.

INTERROGATORIES

1. For each consultant that OMA retains for this proceeding, please describe in detail the scope and purpose of the consultant’s engagement, including the subject matters, issues, and positions regarding which the consultant will analyze and advise OMA. If OMA has not yet determined a particular subject matter, issue, or position regarding which the consultant will analyze and advise OMA, please promptly provide a description as soon as you have determined it.

Response: The OMA has not, at this time, retained consultants for this proceeding.

2. Please identify each witness that OMA will present at the hearing for the Companies’ ESP proceeding. To the extent that OMA does not know yet who all of the witnesses are that it will present at the hearing, please promptly identify each witness as soon as OMA does determine that it will present the witness at the hearing.

Response: The OMA has not secured an expert witness as of this date.

3. For each witness that OMA identifies in response to the previous Interrogatory, please describe in detail the expected scope and purpose of the witness’s testimony, including the subject matter, issues and positions regarding which the witness will present testimony on behalf of OMA.

If OMA has not yet identified a particular witness that it will present at the hearing, or if OMA has not yet determined the particular subject matter, issue, or position regarding which the witness will present testimony on behalf of OMA, please promptly provide a description as soon as you have identified it.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Provide a copy of each document identified or referred to in your responses to Interrogatories 1 - 3.
2. Please provide copies of OMA's responses to all data requests that any other party submits to OMA. This request is continuing.
3. For each witness identified in response to Interrogatory No. 2, please provide copies of all workpapers and other backup documentation supporting the testimony of each witness that testifies on behalf of OMA. 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 schedule/exhibit attached to, that witness's testimony. Please provide the workpapers by no later than the time the testimony is filed.

Response: See answer to Interrogatory 1 and 2.

Respectfully submitted,



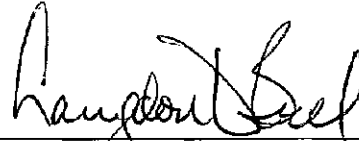
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CERTIFICATE OF SERVICE

This is to certify that a copy of the OMA's Response to Columbus Southern Power Company's and Ohio Power Company's First Set of Interrogatories and Request for Production of Documents was served by E-mail upon counsel for all other parties of record in this case on this 23rd day of September 2008.



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