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October 31, 2008

VIA HAND DELIVERY

Public Utilities Commission of Ohio
Docketing Division, 10th Floor
180 East Broad Street
Columbus, Ohio 43215-3793

RE: Case No. 08-917-EL-SSO
Case No. 08-918-EL-SSO

Dear Sir/Madam:

The attached Response of The Association of Independent Colleges and Universities of Ohio to The First Set of Interrogatories and Request For Production of Documents By Columbus Southern Power Company and Ohio Power Company, is hereby served on the Commission.

Pursuant to Rule 4901-1-02 of the Ohio Administrative Code, attached to this correspondence are one (1) original and twenty (20) copies.

Please provide one (1) time-stamped copies of each the attached documents to the representative hand-delivering this information.

Sincerely,



Andre T. Porter

ATP:amc

Enclosures

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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

RECEIVED-DOCKETING DIV
2008 OCT 31 PM 2:00
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 Corporate)
Separation Plan; and the Sale or Transfer)
of Certain Generating Assets)

Case No. 08-917-EL-SSO

and)

In the Matter of the Application of)
Ohio Power Company for Approval of)
Its Electric Security Plan Including)
Related Accounting Authority; and an)
Amendment to its Corporate Separation)
Plan)

Case No. 08-918-EL-SSO

**RESPONSE OF THE ASSOCIATION OF INDEPENDENT COLLEGES AND
UNIVERSITIES OF OHIO TO THE FIRST SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS BY COLUMBUS SOUTHERN
POWER COMPANY AND OHIO POWER COMPANY**

The Association of Independent Colleges and Universities of Ohio ("AICUO") submits the following answers to Columbus Southern Power Company ("CSP") and Ohio Power Company ("OP"), in response to CSP's and OP's first set of interrogatories and request for production of documents dated October 28, 2008, in accordance with the rules of the Public Utilities Commission of Ohio ("PUCO"), O.A.C. 4901-1-16(D) and (E), 4901-1-19, and 4901-1-20.

GENERAL OBJECTIONS

AICUO has attempted to be responsive to each and every one of CSP and OP's requests and provides the following responses to the best of its current information and belief. However,

each of CSP and OP's Interrogatories and Document Requests, including the definitions relative thereto, are responded to subject to the general objections set forth below. These objections form a part of each of AICUO's responses to CSP and OP's requests even though they may not be specifically referred to in each and every response. Failure to incorporate any of these general objections to any specific response should not be construed as a waiver of same. Discovery is continuing and the responses are given with the caveat that, as discovery continues, AICUO may modify and amend certain of the responses to reflect newly discovered and acquired information.

1. AICUO objects to each document request to the extent it calls for the production of materials protected by the attorney/client privilege or the work product doctrine.

2. AICUO objects to each document request to the extent it seeks information or documents already within CSP and OP's knowledge, possession, custody or control or is equally or more easily available to CSP and OP, on the grounds that such request is unduly burdensome and oppressive.

3. AICUO objects to each document request to the extent it requests information that is irrelevant and immaterial and/or is not reasonably calculated to lead to the discovery of admissible evidence in the present action.

4. AICUO objects to each document request to the extent that it is overly broad and/or unreasonably burdensome so as to render it impossible to respond to in any reasonable time or manner.

5. AICUO objects to each document request to the extent that it purports to require AICUO to locate or produce documents not within AICUO's possession, custody or control.

6. In responding to these Requests, AICUO is not waiving any objection or failing to claim any privilege available to it, including, but not limited to, the attorney-client privilege, work product privilege, or any other privilege available by statute, rule or common law.

7. AICUO objects to CSP and OP's interrogatories insofar as they seek discovery of any material that constitutes impressions, conclusions, opinions, or legal theories of AICUO's attorneys.

INTERROGATORIES

Interrogatory No. 1: For each consultant that AICUO 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 AICUO. If AICUO has not yet determined a particular subject matter, issue, or position regarding which the consultant will analyze and advise AICUO, please promptly provide a description as soon as you have determined it.

Response: AICUO has not retained any consultants at this time.

Interrogatory No. 2: Please identify each witness that AICUO will present at the hearing for the Companies' ESP proceeding. To the extent that AICUO 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 AICUO does determine that it will present the witness at the hearing.

Response: AICUO does not know yet what witnesses it will present at the hearing.

Interrogatory No. 3: For each witness that AICUO identified in response to the previous Interrogatory, please describe in detail the expected scope and purpose of the witness' testimony, including the subject matters, issues, and positions regarding which the witness will present testimony on behalf of AICUO. If AICUO has not yet identified a particular witness that it will

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

Response: AICUO does not know yet what witnesses it will present at the hearing.

REQUEST FOR PRODUCTION OF DOCUMENTS

Request for production No. 1: Provide a copy of each document identified or referred to in your responses to Interrogatories 1-3.

Response: AICUO did not identify any documents in Interrogatories 1-3.

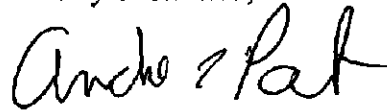
Request for production No. 2: Please provide copies of AICUO's responses to all data requests that ny other party submits to AICUO. This request is continuing.

Response: AICUO has not submitted data to any other party in response to a request. AICUO has not received any data requests from any other party.

Request for production No. 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 AICUO. 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: No witnesses were identified in response to Interrogatory No. 2.

Respectfully Submitted,



C. Todd Jones (0083418)

General Counsel, AICUO

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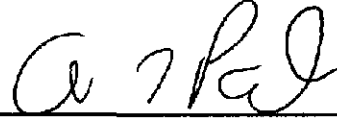
(614) 462-2700 (Main Number)

(614) 222-4707 (Facsimile)

Attorneys for the AICUO

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Response of The Association of Independent Colleges and Universities of Ohio To The First Set of Interrogatories and Request For Production of Documents By Columbus Southern Power Company and Ohio Power Company was served via electronic mail to the parties listed below on the 31st day of October, 2008.



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