

FILE

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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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

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

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Pursuant to Rules 4901-1-16, 4901-1-19 and 4901-1-20 of the Ohio Administrative Code, The Association of Independent Colleges and Universities of Ohio ("AICUO") directs the following interrogatories and requests for production of documents to Columbus Southern Power Company ("CSP") and Ohio Power Company ("OP"). CSP and OP are requested to respond to the interrogatories, in writing, and under oath, within the timeframe required by law or by entry of the Commission in the above captioned proceeding. The responses to these interrogatories and document requests shall be deemed continuing so as to require supplemental responses.

**INSTRUCTIONS**

Answers are to be provided fully and completely to each and every interrogatory set forth below. If a claim of privilege is made which causes information withheld, please state

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fully the nature of the information withheld in order to permit the Commission to make a determination of the property of the assertion of privilege.

Each of the definitions set forth below shall be used in interpreting the Interrogatories hereby propounded.

### **DEFINITIONS**

Where used in these Interrogatories, the terms:

1. "Document" shall include without limitation writings, drawings, charts, graphs, sketches, architectural plans or blueprints, written descriptions or specifications, calculations, photographs, films, phonograph or other sound records, forms, memoranda, minutes, notes, agreements, diaries, calendars, appointment books, summaries, indexes, telegrams, contracts, telexes, meeting or visit minutes, organization charts, expense accounts, work orders, work reports, invoices and any and all other written, printed typed, tape recorded or otherwise recorded matter of whatever nature, and all documents within the meaning of Rule 34, Ohio Rules of Civil Procedure, regardless of whether originals, duplicates or copies, and each copy of the foregoing which contains handwritten notations or which is for any other reason non-identical, which are in the custody possession or control of CSP, OP, or of its agents, representatives, counsel, consultants, accountants, private investigators, and others who are in possession of documents on OP or CSP's behalf.

2. "Identify" or "state the identity of" as used with respect to a natural person, shall mean:

a. State the individual's full name;

- b. State the individual's present or last known residence address;
- c. State the individual's present or last known business address;
- d. State the individual's present or last known occupation, position or business affiliation.

3. "Identify" or "state the identity of" as used with respect to a person other than a natural person, shall mean:

- a. State its full name and specify its nature (e.g., corporation);
- b. State its present or last known address;
- c. In the case of a corporation, specify the state in which it is incorporated; and in the case of any other entity, specify the state in which it has its principal place of business;
- d. In the case of a partnership, identify each partner;
- e. In the case of any other business entity, identify each owner.

4. "Identify", as used with respect to a document or thing, shall mean:

- a. State the general description and nature of the document or thing (e.g., contract, letter, memorandum, sound recording, artifact), and the identifying number or other identifying characteristic;
- b. State the date or approximate date of the document;
- c. Identify each person who signed, prepared or transmitted the document;

- d. Identify each person to whom the document or thing was transmitted;
  - e. Identify each person having possession, custody or control of the original document or thing; or, if the original does not exist or cannot be located, identify each person having possession, custody or control of a copy;
  - f. State the present location of the original document or thing or, if the original does not exist or cannot be located, the location of each copy;
  - g. If the document is not attached or produced for inspection and copying, set forth its substance.
- 5. "And" shall mean and/or.
  - 6. "Or" shall mean and/or.

If you do not clearly understand, or have any questions about, these definitions or instructions, please contact counsel for the AICUO promptly for clarification.

#### **FIRST SET OF INTERROGATORIES**

- (1) State the name, position and title of each person providing answers to these interrogatories and document requests, and identify each interrogatory or document request to which the individual is providing a response.
- (2) State the amount paid to OP or CSP in calendar year 2007 for electric service by the following member institutions of the AICUO: Blufton University, Capital University, Columbus College of Art & Design,

Denison University, The University of Findlay, Franciscan University of Steubenville, Franklin University, Heidelberg College, Kenyon College, Malone University, Mount Carmel College of Nursing, Mount Vernon Nazarene University, Muskingum College, University of Northwestern Ohio, Ohio Dominican University, Ohio Northern University, Ohio Wesleyan University, Otterbein College, University of Rio Grande, Tiffin University, Walsh University, Wittenberg University, and The College of Wooster.

- (3) State the estimated amount to be paid by the AICUO member institutions mentioned in Interrogatory 2 for electric utility service in calendar years 2009, 2010, and 2011, including charges for base generation, riders, surcharges, deferred costs and any other cost to be paid based upon the electric security plan filed by CSP and OP.
- (4) State the costs of CSP or OP to generate and distribute electricity to the AICUO member institutions mentioned in Interrogatory 2.
- (5) State whether there is any difference in costs of CSP or OP to generate and distribute electricity to the AICUO member institutions mentioned in Interrogatory 2 based upon the time of day which the electricity is generated and distributed.

- (6) Under the current Standard Service Offer, describe any differences in rates, charges, or costs paid by AICUO member institutions mentioned in Interrogatory 2 to OP or CSP for electric service based upon the time of day during which electricity is used and if there are any differences in rates, charges and costs describe the charges and costs for each AICUO member institution mentioned in Interrogatory 2 along with the corresponding time of day.
- (7) Under the electric security plans filed by OP and CSP, describe any differences in rates, charges, or costs to be paid by AICUO member institutions mentioned in Interrogatory 2 to OP or CSP for electric service based upon the time of day during which electricity is used and if there are any differences in rates, charges and costs describe the charges and costs for each AICUO member institution mentioned in Interrogatory 2 along with the corresponding time of day.
- (8) If OP or CSP does not charge the AICUO member institutions mentioned in Interrogatory 2 different rates for electricity based upon the time of day, please state whether it is possible for CSP or OP to bill AICUO member institutions different rates based upon the time of day during which electricity is used.

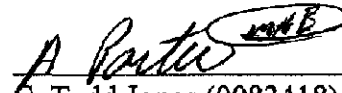
- (9) State the name of every customer, if any, that CSP or OP charges different rates based upon the time of day during which electricity is used.

**FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

- (1) Any and all documents, writings or other things related to the estimated amount to be paid by the AICUO member institutions mentioned in AICUO 2 for electric utility service in 2009, 2010, and 2011, including charges for base generation, riders, surcharges, deferred costs and any other cost to be paid based upon the electric security plan filed by CSP and OP.
- (2) Any and all documents, writings or other things related to the costs of OP or CSP to generate and distribute power for the AICUO member institutions mentioned in Interrogatory 2.
- (3) Any and all documents, writings, or other things related to any difference in costs of CSP or OP to generate and distribute electricity to the AICUO member institutions mentioned in Interrogatory 2 based upon the time of day which the electricity is generated and distributed.

- (4) Any and all documents, writings, or other things related to the ability of CSP or OP to change its charges or rates based upon the time of day.

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "C. Todd Jones", is written over a horizontal line. To the right of the signature, the word "noted" is written in a smaller, cursive script.

C. Todd Jones (0083418)

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## CERTIFICATE OF SERVICE

I hereby certify that a copy of The Association of Independent Colleges and Universities of Ohio First Set of Interrogatories and Request for Production of Documents to Columbus Southern Power Company and Ohio Power was served via electronic mail to the parties listed below on the 3rd day of November, 2008.

  
Andre T. Porter

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