

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of )  
Columbus Southern Power Company ) CASE NO. 11-346-EL-SSO  
and Ohio Power Company for Authority ) CASE NO. 11-348-EL-SSO  
to Establish a Standard Service Offer )  
Pursuant to Section 4928.143, Revised )  
Code, in the Form of an Electric )  
Security Plan. )

In the Matter of the Application of )  
Columbus Southern Power Company ) CASE NO. 11-349-EL-AAM  
and Ohio Power Company for Approval ) CASE NO. 11-350-EL-AAM  
of Certain Accounting Authority. )

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FIRST SUPPLEMENTAL RESPONSES TO OHIO POWER COMPANY'S FIRST SET  
OF INTERROGATORIES AND REQUEST FOR PRODUCTION  
OF DOCUMENTS TO THE OHIO RESTAURANT ASSOCIATION

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**RESPONSES TO INTERROGATORIES**

1. Please identify each consultant that you have retained to assist you in the ESP proceeding.

- a) If the consultant is an organization, please identify each individual employed by the organization who is assisting you in the ESP proceeding.
- b) If you have not yet retained a particular consultant, please promptly identify the consultant (and the individuals employed by the consultant who are assisting you if the consultant is an organization) as soon as you do retain the consultant.

**RESPONSE:** The Ohio Restaurant Association ("ORA") has not retained a consultant.

We assume by the term consultant you do not mean the attorneys who assisted ORA by

filing the Motion to Intervene (Buckley King, LPA, Diem N. Kaelber and Robert J. Walter).

2. For each consultant that you retain, 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 you. If you have not yet determined a particular subject matter, issue, or position regarding which the consultant will analyze and advise you, please promptly provide a description as soon as you have determined it.

**RESPONSE:** See response to No. 1 above.

3. Please identify each witness that you will present at the hearing for the ESP proceeding. To the extent that you do not yet know all of the witnesses whom you will present at the hearing, please promptly identify each witness as soon as you determine that you will present the witness at the hearing.

**FIRST SUPPLEMENTAL RESPONSE:** ORA will present the written testimony of Mr. Richard Mason, ORA Director of Government Affairs, 1525 Bethel Road, Columbus, Ohio 43220 in connection with this matter.

4. For each witness that you identify in response to the previous Interrogatory, please describe in detail the purpose of the witness's testimony, including the subject matters, issues, and positions regarding which the witness will present testimony on your behalf. If you have not yet identified a particular witness that you will present at the hearing, or if you have not yet determined the particular subject matter, issue, or position regarding which the witness will present testimony on your behalf, please promptly

provide a description as soon as you have identified the witness, subject matter, issue, or position.

**FIRST SUPPLEMENTAL RESPONSE:** Mr. Richard Mason is expected to provide written testimony regarding ORA's mission, membership and organizational structure; ORA's position on electric deregulation in Ohio; and the impact of AEP's proposed rate increase on ORA members.

5. Please identify any joint defense agreement that you have entered into with any other party to these proceedings, including the date of that joint defense agreement, the identities of the parties to the joint defense agreement, and the scope and duration of the joint defense agreement.

**RESPONSE:** None.

#### **RESPONSES TO REQUEST FOR PRODUCTION OF DOCUMENTS**

1. Produce a copy of each document you identified, consulted, referred to, or utilized in preparing your responses to Interrogatories 1-5.

**RESPONSE:** None

2. Please produce copies of your responses to all data requests or discovery requests that any other party submits to you.

**RESPONSE:** N/A

3. For each witness identified in response to Interrogatory No. 3, please produce copies of all workpapers and other backup documentation supporting that witness's testimony. Each workpaper should be identified in a manner that links it to the particular witness's testimony that it supports and to the particular issue addressed by, or to the

specific schedule/exhibit attached to, that witness's testimony. Please produce the workpapers by no later than the time the testimony is filed.

**FIRST SUPPLEMENTAL RESPONSE:** ORA will provide a copy of Mr. Richard Mason's written testimony once it is available.

4. For each witness who files testimony on your behalf in the ESP proceeding, please produce copies of all workpapers and other backup documentation supporting that witness's testimony. Each workpaper should be identified in a manner that links it to the particular witness's testimony that it supports and to the particular issue addressed by, or to the specific schedule/exhibit attached to, that witness's testimony. If these responses are provided prior to the filing of any testimony please supplement this filing to produce the workpapers at the same time as the testimony is filed in this case. If testimony is filed before these responses are provided please include workpapers preferably as soon as filing but no later than the date on which you respond to these requests.

**FIRST SUPPLEMENTAL RESPONSE:** ORA will provide a copy of Mr. Richard Mason's written testimony once it is available.

5. Please produce copies of any:

- a) Requests for proposals that you issue or have issued for the retention of any consultants for this proceeding.
- b) Contracts that you enter or have entered into with any such consultant(s).
- c) Submissions that you make or have made to the State Controlling Board to obtain approval of the contract(s) that you enter into with any such consultant(s).

**RESPONSE:** N/A

6. Please produce copies of all non-privileged documents in your possession, including any documents created or possessed by any of your employees, agents, or representatives, regarding the ESP proceeding.

**RESPONSE:** N/A

Respectfully submitted,

/s/ Diem N. Kaelber

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OF COUNSEL:

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Counsel for Ohio Restaurant Association

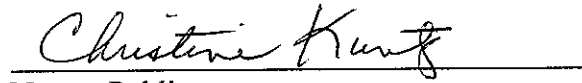
**VERIFICATION**

STATE OF OHIO                    )  
  ) SS:  
COUNTY OF FRANKLIN        )

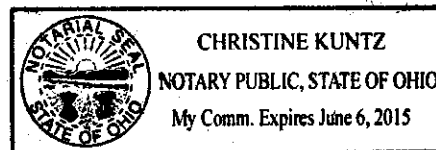
I, Geoffrey D. Hetrick, President and CEO of the Ohio Restaurant Association, being first duly sworn and cautioned, state that I have all requisite authority to sign the foregoing instrument, and that I have reviewed and answered the foregoing responses/answers to Ohio Power Company's First Set of Interrogatories to the Ohio Restaurant Association, and affirm that the answers/responses are true and accurate to the best of my knowledge.

  
\_\_\_\_\_  
Geoffrey D. Hetrick

Sworn to before me and subscribed in my presence this   1   day of May, 2012.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:   6/6/15  



### CERTIFICATE OF SERVICE

A copy of the foregoing First Supplemental Responses to Ohio Power Company's First Set of Interrogatories and Request for Production of Documents to the Ohio Restaurant Association has been served upon the below-named counsel and Attorney Examiners by electronic mail to all Parties, this 1<sup>st</sup> day of May 2012.

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/s/ Diem N. Kaelber  
Diem N. Kaelber (0087155)

1191380\_1 (22413-00049)

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**5/1/2012 11:56:43 AM**

**in**

**Case No(s). 11-0346-EL-SSO, 11-0348-EL-SSO, 11-0349-EL-AAM, 11-0350-EL-AAM**

Summary: Response First Supplemental Responses to Ohio Power Company's First Set of Interrogatories and Request for Production of Documents to the Ohio Restaurant Association electronically filed by Ms. Diem N. Kaelber on behalf of Ohio Restaurant Association