

In the Matter of the Joint Motion to Modify)
the December 2, 2009 Opinion and Order)
and the September 7, 2011 Second Opinion) Case No. 12-2637-GA-EXM
and Order in Case No. 08-1344-GA-EXM)
)

Stand Energy Corporation, through the undersigned counsel, provides the following responses to Columbia Gas of Ohio, Inc.'s First Set of Interrogatories and Requests For Production of Documents:

Interrogatory No. 1: Please identify each consultant you have retained to assist you in this proceeding.

- Response:**

Stand Energy has not yet retained a consultant. If Stand Energy retains a consultant, Columbia Gas of Ohio will be so notified.

For each consultant that you retain to assist you in 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 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 above.

Interrogatory No. 2: Please identify each witness that you will present at the hearing for this 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.

Response:

Stand Energy has not yet identified witnesses, if any, that it will present. If Stand Energy decides to utilize one or more witnesses, Columbia Gas of Ohio will be so informed.

Interrogatory No. 3: 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.

Response:

See Response to Interrogatory No. 2 above.

REQUESTS FOR PRODUCTION OF DOCUMENTS

You must serve a written response to each of the following requests. For each request, you must either state that you will produce the requested document(s) or, if you object to the request, state the reason for your objection. If you object only to part of a request, specify the part to which you object. When you produce documents responsive to these requests, please identify the request to which each document is responsive.

Request for Production No. 1: Please produce a copy of each document you identified, consulted, referred to, or utilized in preparing your responses to Interrogatory No. 1 through Interrogatory No. 4.

Response:

No documents responsive to this request were required to respond to the Interrogatories.

Request for Production No. 2: Please produce copies of your responses to all data requests or discovery requests that any other party propounds to you in connection with this proceeding.

Response:

No data requests or discovery requests have been propounded to Stand Energy by any other party or pending intervenor to this case.

Request for Production No. 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 date on which you file the witness' testimony with the PUCO.

Response:

N/A. See Response to Interrogatory No. 2 above.

Request for Production No. 4: Please produce a copy of any contracts that you enter or have entered into with any consultant(s) that you have retained for this proceeding.

Response:

N/A

Request for Production No. 5: Please produce a copy of any and all non-privileged documents in your possession, including any documents created or possessed by any of your employees, agents, or representatives, regarding this proceeding.

Response:

No documents regarding this proceeding have been created by Stand Energy other than privileged communications between counsel regarding this regulatory litigation.

Request for Production No. 6: Please produce a copy of any and all documents you intend to introduce as evidence or use for purposes of cross-examination in the hearing in this proceeding.

Response:

Stand Energy has not begun to prepare its cross-examination of Columbia or other witnesses in this case. If, in the preparation for the hearing Stand Energy identifies one or more documents responsive to this request, the proposed documentary exhibit will be furnished to Columbia.

Respectfully submitted,

STAND ENERGY CORPORATION



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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Stand Energy Corporation Responses to Columbia Gas of Ohio's First Set of Interrogatories and Requests for Production of Documents was served by electronic mail upon the following parties this 21st day of November 2012:

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Summary: Response Stand Energy Corporation's Responses to Columbia Gas of Ohio Inc's First Set of Interrogatories and Requests For Production of Documents. electronically filed by Mr. John M. Dosker on behalf of McIntosh, Brian Mr.