

FILE

**PUCO EXHIBIT FILING**

Date of Hearing: 11/6/17

Case No. 16-1852-EL-SSO, 16-1853-EL- AAM

PUCO Case Caption: In the Matter of the Application of Ohio Power  
Company for Authority 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  
Ohio Power Company for Approval of Certain Accounting Authority

**List of exhibits being filed:**

OCC Exhibits 6 & 7

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Reporter's Signature: [Signature]

Date Submitted: 11/7/2017

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

- - -  
In the Matter of the :  
Application of Ohio Power :  
Company for Authority to :  
Establish a Standard :  
Service Offer Pursuant to : Case No. 16-1852-EL-SSO  
Section 4928.143, Revised :  
Code, in the Form of an :  
Electric Security Plan. :

In the Matter of the :  
Application of Ohio Power :  
Company for Approval of : Case No. 16-1853-EL-AAM  
Certain Accounting :  
Authority. :

- - -  
PROCEEDINGS

before Ms. Grëta See and Ms. Sarah Parrot, Attorney  
Examiners, at the Public Utilities Commission of  
Ohio, 180 East Broad Street, Room 11-A, Columbus,  
Ohio, called at 10:00 a.m. on Monday, November 6,  
2017.

- - -  
VOLUME IV  
- - -

ARMSTRONG & OKEY, INC.  
222 East Town Street, Second Floor  
Columbus, Ohio 43215-5201  
(614) 224-9481 - (800) 223-9481  
Step One - - -

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio	)	
Power Company for Authority to Establish a	)	Case No. 16-1852-EL-SSO
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 Ohio	)	
Power Company for Approval of Certain	)	Case No. 16-1853-EL-AAM
Accounting Authority	)	

**RESPONSES AND OBJECTIONS TO  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S  
FIRST SET OF INTERROGATORIES, REQUEST FOR ADMISSIONS, AND  
REQUEST FOR PRODUCTION OF DOCUMENTS OF THE  
RETAIL ENERGY SUPPLY ASSOCIATION**

In accordance with Ohio Adm. Code 4901-1-19(A) and 4901-1-20(C), the Retail Energy Supply Association (RESA) hereby provides its responses to the Office of the Ohio Consumers' Counsel's (OCC) First Set of Interrogatories, Request for Admissions, and Request for Production of Documents, served on September 26, 2017.

**I. GENERAL OBJECTIONS**

RESA's responses to the OCC's First Set of Interrogatories, Request for Admissions, and Request for Production of Documents are subject to the following general objections:

1. RESA objects to the Instructions for Answering to the extent such instructions purport to impose discovery obligations that are inconsistent with the Commission's rules for discovery.
2. RESA objects to each interrogatory and request for production to the extent such discovery request seeks the disclosure of information subject to attorney-client privilege or that constitutes attorney work product.

3. RESA objects to each interrogatory and request for production that purports to require a detailed, narrative response. Under applicable Commission rules and the Ohio Rules of Civil Procedure, “[a]n interrogatory seeks an admission or seeks information of major significance in the trial or in the preparation for trial. It does not contemplate an array of details or outlines of evidence, a function reserved by the rules for deposition.” *Penn Central Transp. Co. v. Armco Steel Corp.*, 27 Ohio Misc. 76, 77 (Montgomery Cty. 1971).

STIP-INT-1-033. In reference to the Direct Testimony of Matthew White at page 13:265-266, have you conducted any studies or analyses to support this statement?

**RESPONSE:** RESA objects that this interrogatory is vague, undefined, and overbroad, and falsely assumes such a study is needed. Subject to and without waiving these objections, RESA answers as follows: No, RESA has not conducted such a study.

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio	)	
Power Company for Authority to Establish a	)	Case No. 16-1852-EL-SSO
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 Ohio	)	
Power Company for Approval of Certain	)	Case No. 16-1853-EL-AAM
Accounting Authority	)	

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STIP-INT-1-030. In reference to the Direct Testimony of Matthew White at page 13:270-272, (“Further customers may not even want separate price for each service, but rather may want a bundled all-in price.”) have you conducted any studies or analyses to support this statement?

**RESPONSE:** RESA objects that this interrogatory is vague, undefined, and overbroad, and falsely assumes such a study is needed. Subject to and without waiving these objections, RESA answers as follows: No.