

EXHIBIT "A"

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Federal Insurance Company,)	
as subrogee of Genesis Healthcare System,)	
)	
Complainant,)	Case No. 12-1750-EL-CSS
)	
v.)	
)	
American Electric Power Company, Inc.,)	
)	
Respondent.)	

**RESPONDENT OHIO POWER COMPANY’S OBJECTIONS AND RESPONSES
TO COMPLAINANT’S FOURTH SET OF INTERROGATORIES**

Respondent Ohio Power Company (“OPCo”) hereby responds to Complainant’s Fourth Set of Interrogatories.

GENERAL OBJECTIONS

1. OPCo has not completed its investigation of the facts and circumstances relating to this action, has not completed its search for documents, records, and information, and has not completed discovery in this action. All of the responses set forth below are based solely upon the information and documents presently available to OPCo. Discovery will continue as long as permitted and the investigation by OPCo, OPCo’s attorneys, and OPCo’s agents will continue throughout this proceeding. As the investigation and discovery proceed, witnesses, facts, documents, and evidence may be discovered that are not set forth herein but that may be responsive to Complainant’s Fourth Set of Interrogatories. The following responses are given without prejudice to OPCo’s right to alter or amend these responses as the result of subsequently discovered evidence and to present such evidence in any proceeding, including, but not limited to, expert testimony, discovered or obtained after the date of these responses.

2. OPCo objects to Complainant's Fourth Set of Interrogatories. to the extent they seek the production of information that is protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege or protection.

3. OPCo incorporates the foregoing General Objections into each and every objection and/or individualized response contained herein and set forth below and into each and every amendment, supplement, or modification to these responses hereinafter provided to the specific request. OPCo does not waive any General Objections in response to any specific interrogatory propounded.

4. Because discovery in this matter is still ongoing, OPCo expressly reserves the right to supplement and amend its responses.

Subject to the foregoing objections, OPCo responds to the discovery requests as follows:

INTERROGATORIES

1. Did you know that the tap changer at the substation went into full boost before Charles Thomas Williams at Genesis Healthcare System notified you that Genesis Healthcare System "...had some issues with certain equipment shutting down on overvoltage condition..." as per his e-mail message to your former employee John Roberts on June 15, 2010 at 12:13 p.m. See copy of e-mail message produced by Complainant as GHS008 and marked as Exhibit 1 during the deposition of Charles Thomas Williams on June 27, 2013. The term "substation" is defined and identified within paragraph number 3 of the Definitions and Instructions section above. The terms "you" and "your" are defined within paragraph number 10 of the Definitions and Instructions section above.

Answer:

Subject to and without waiving the general objections set forth above, no.

2. If your answer to Interrogatory number 1 above is yes, state when you first learned that the tap changer at the substation went into full boost. Specifically, this interrogatory seeks identification of both the date and time when you first learned that the tap changer went into full boost as it relates to the incident. The tap changer which went into full boost refers to the tap changer identified by your former employee John Roberts in the e-mail message he sent to Charles Thomas Williams at Genesis Healthcare System on June 15, 2010 at 4:50 p.m., which was produced by Complainant as GHS007 and marked as Exhibit 3 during the deposition of Charles Thomas Williams on June 27, 2013. The term "substation" is defined and identified within paragraph number 3 of the Definitions and Instructions section above. The incident refers to the subject of the e-mail message cited in Interrogatory number 1 above. The term "incident" is further defined within paragraph number 2 of the Definitions and Instructions section above, and the terms "you" and "your" are defined within paragraph number 10 of the Definitions and Instructions section above.

Answer:

See response to Interrogatory No. 1, above.

3. Identify by name, address, and job title, your employee or employees who first learned that the tap changer at the substation went into full boost. The tap changer which went into full boost refers to the tap changer identified by your former employee John Roberts in the e-mail message he sent to Charles Thomas Williams at Genesis Healthcare System on June 15, 2010 at 4:50 p.m., which was produced by Complainant as GHS007 and marked as Exhibit 3 during the deposition of Charles Thomas Williams on June 27, 2013. The term “substation” is defined and identified within paragraph number 3 of the Definitions and Instructions section above. The term “your” is defined within paragraph number 10 of the Definitions and Instructions section above.

Answer:

Subject to and without waiving the general objections set forth above, OPCo states that the following individuals were the first to learn that the tap changer at the Linden Avenue substation went into full boost:

Carlos Brewer
Station Supervisor
Ohio Power Company
1900 Licking Road,
Zanesville, Ohio 43701

Gary Parker
Station Servicer
Ohio Power Company
1900 Licking Road,
Zanesville, Ohio 43701

Mr. Brewer and Mr. Parker may be contacted only through the undersigned counsel for OPCo.

4. Identify and describe how you learned that the tap changer went into full boost. The tap changer that went into full boost refers to the tap changer identified by your former employee John Roberts in the e-mail message he sent to Charles Thomas Williams at Genesis Healthcare System on June 15, 2010 at 4:50 p.m., which was produced by Complainant as GHS007 and marked as Exhibit 3 during the deposition of Charles Thomas Williams on June 27, 2013. The terms “you” and “yours” is defined within paragraph number 10 of the Definitions and Instructions section above.

Answer:

Subject to and without waiving the general objections set forth above, Carlos Brewer received a telephone call that day stating that there might be an over-voltage issue at the Linden Avenue substation. After he received that call, he called Gary Parker and the two went to the Linden Avenue substation to investigate the issue. Upon arriving at the substation, Mr. Brewer and Mr. Parker found that the load tap changer was in full boost.

5. For substations owned and/or operated by you, identify and describe all equipment, computer programs, software programs, control panel programs, alarm systems, or any other devices available to you for monitoring and/or determining when a tap changer goes into full boost. The term “you” is defined within paragraph number 10 of the Definitions and Instructions section above.

Answer:

Subject to and without waiving the general objections set forth above, OPCo states that no computer equipment; computer, software, or control panel programs; alarm systems; or devices are available to it for “monitoring and/or determining when a tap changer goes into full boost.”

6. For the equipment, computer programs, software programs, control panel programs, alarm systems, or any other devices identified in answer to Interrogatory number 5 above, state whether the equipment, computer programs, software programs, control panel programs, alarm systems, or any other devices were available and in use for the tap changer that went into full boost at the time of the incident and, for each identified equipment, computer programs, software programs, control panel programs, alarm systems, or any other devices, also state the location of the equipment, computer programs, software programs, control panel programs, alarm systems, or other devices. The terms “incident” and “tap changer that went into full boost” refers to the subject of Interrogatory number 1 and Interrogatory number 2 above and this term “incident” is further defined within paragraph number 2 of the Definitions and Instructions section above.

Answer:

See response to Interrogatory No. 5, above.

7. State whether any of the equipment, computer programs, software programs, control panel programs, alarm systems, or any other devices identified in answer to Interrogatory number 5 above are monitored by you 24 hours a day seven days a week and/or provide notification or an alarm 24 hours a day seven days a week in the event that a substation tap changer goes into full boost. If your answer is yes, and if the monitoring takes place at a location other than the substation, or if the notification or alarm is received at a location other than the substation, identify by address the location or locations, including the addresses of any central monitoring stations or facilities and/or identify the employee or employees responsible for monitoring or receiving notification or an alarm in the event that a substation tap changer goes into full boost.

Answer:

See response to Interrogatory No. 5, above.

8. If any of the equipment, computer programs, software programs, control panel programs, alarm systems, or any other devices identified in answer to Interrogatory number 5 and Interrogatory number 6 above were not available or in use for the substation at the time of the incident, state the reasons why. The term "substation" is defined and identified within paragraph number 3 of the Definitions and Instructions section above. The term "incident" refers to the subject of Interrogatory number 1 and Interrogatory number 2 above, and the term "incident" is further defined within paragraph number 2 of the Definitions and Instructions section above.

Answer:

See response to Interrogatory No. 5, above.

Respectfully submitted,

/s/ Christen M. Blend

Steven T. Nourse

Counsel of Record

Yazen Alami

American Electric Power Service Corp.

1 Riverside Plaza, 29th Floor

Columbus, Ohio 43215-2373

(614) 716-1608

(614) 716-2014 *fax*

stnourse@aep.com

yalami@aep.com

Christen M. Blend

Porter Wright Morris & Arthur, LLP

41 South High Street, 30th Floor

Columbus, Ohio 43215

(614) 227-2086

(614) 227-2100 *fax*

cblend@porterwright.com

Counsel for Respondent

Ohio Power Company

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by e-mail upon counsel for the
Complainant on this 22nd day of July, 2013.

Daniel C. Theveny, Esq.
Cozen O'Connor
1900 Market Street
Philadelphia, PA 19103
DTheveny@cozen.com

/s/ Christen M. Blend
Christen M. Blend

COLUMBUS/1681620v.1