EXHIBIT "F"



American Electric Power 1 Riverside Plaza Columbus, OH 43215-2373 AEP.com

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

August 29, 2012

Re:

Federal Insurance Company v. American Electric Power Company

Case no. 12-1750-EL-CSS

Sophia L Chang Legal Department 614/716-1279 (P) 614/716-1687 (F) slchang@aep.com

Dear Mr. Theveny:

Enclosed please find a copy of <u>Respondent Ohio Power Company's Responses to Complainant's Second Set of Requests for Production.</u> Please feel free to call or email me should you have any questions. Thanks.

Very truly yours,

Sophia L. Chang < Legal Department

end.

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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

RESPONDENT OHIO POWER COMPANY'S RESPONSES TO COMPLAINANT'S SECOND SET OF REQUESTS FOR PRODUCTION

Respondent Ohio Power Company d/b/a American Electric Power Company, Inc. (hereinafter "AEP") hereby responds to Complainant's Second Set of Requests for Production.

REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS

1. Produce for inspection the tap changer that went into full boost on the date of the incident. The term "incident" is defined within paragraph 2 of the Definitions section above.

Response: The items requested for inspection will be made available at a mutually agreed upon time and under mutually agreed upon terms, with the Complainants bearing the costs associated with inspection.

2. Produce for inspection the control panel and/or control board for the tap changer that went into full boost on the date of the incident. The term "incident" is defined within paragraph 2 of the Definitions section above.

Response: Pursuant to AEP's standard business practices, the control panel was cycled through and is not available for inspection.

3. Produce for inspection the main control panel and/or main control board for the substation which supplied electric power to the subject property. The term "subject property" and "substation" are defined within paragraphs 1 and 3 of the Definitions section above.

Response: See Response to Request No. 1.

4. Produce for inspection any overvoltage alarm, monitoring, and/or sensing equipment for the tap changer that went into full boost on the date of the incident. The term "incident" is defined within paragraph 2 of the Definitions section above.

Response: See Response to Request No. 1.

Respectfully submitted,

/s// Marilyn McConnell
Marilyn McConnell (0031190)
Sophia Chang (0086258)
American Electric Power Service Corporation
1 Riverside Plaza, 29th Floor
Columbus, Ohio 43215
(614) 716-2964
(614) 716-1687 facsimile

mmcconnell@aep.com slchang@aep.com

Counsel for Respondent

CERTIFICATE OF SERVICE

I hereby certify that the foregoing <u>Respondent Ohio Power Company's Responses to Complainant's Second Set of Requests for Production</u> was served by electronic mail upon counsel for Complainant at the address listed below on this 29th day of August 2012.

/s// Marilyn McConnell
Marilyn McConnell

Daniel C. Theveny, Esq. Darcel Boogaard, Esq. Cozen O'Connor 1900 Market Street DTheveny@cozen.com DBoogaard@cozen.com

Andrew Avellano, Esq. drewavo@wowway.com