

# **EXHIBIT “G”**



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

October 1, 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 Respondent Ohio Power Company's Objections and Responses to Complainant's Second Set of Interrogatories and Third Set of Requests for Production. Please feel free to call or email me should you have any questions. Thanks.

Very truly yours,

A handwritten signature in black ink, appearing to read 'SLC', is written over a horizontal line.

Sophia L. Chang  
Legal Department

encl.

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 OBJECTIONS AND  
RESPONSES TO COMPLAINANT'S SECOND SET OF INTERROGATORIES  
AND THIRD SET OF REQUESTS FOR PRODUCTION**

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

**GENERAL OBJECTIONS**

1. AEP 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 AEP. Discovery will continue as long as permitted and the investigation by AEP, AEP's attorneys, and AEP'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 the Interrogatories and Requests for Production of Documents. The following responses are given without prejudice to AEP'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. Nothing herein shall be construed as an admission by AEP with respect to the admissibility or relevance of any documents produced. Further, AEP's responses are made without in any way waiving:

a. The right to object on the grounds of competency, relevancy, materiality, hearsay or on any other proper ground to the use of any such information for any purpose, in whole or in part, in any subsequent stage of proceeding in this action or any other action; or

b. The right to object on any and all grounds, at anytime, to any other discovery procedure relating to the subject matter of these discovery requests.

3. AEP objects to the discovery requests to the extent they seek documents in the public domain and/or to which complainant has equal or greater access.

4. AEP objects to the discovery requests to the extent they seek disclosure or production of confidential, proprietary, trade secret, and/or constitutionally protected business information.

5. AEP objects to the discovery requests 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.

6. AEP 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. AEP does not waive any General Objections in response to any specific Request propounded.

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

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

### **INTERROGATORIES**

1. State whether the "AEP's standard business practices" referred to in Respondent's answer to Complainants Second Set of Requests for Production number 2 are included within in any written operations manual, procedures manual, guidelines, instructions, directives, or in any other written form. If so, please describe and identify the written document which contains these standard business practices and state the current location of same.

**Answer: AEP's standard business practices referred to in its answer to Complainant's Second Set of Requests for Production are not found in any written document.**

2. Describe in detail and with particularity how "the control panel was cycled through" as stated within Respondent's answer to Complainant's Second Set of Requests for Production number 2.

**Answer: The control panel was disposed of after it was replaced.**

3. State why AEP's Standard Business Practices required the cycling through of the control panel as described in response to the interrogatory above.

**Answer: AEP objects to this interrogatory to the extent it mischaracterizes AEP's Standard Business Practices as a mandatory written policy. Subject to and without waiving this objection, the cycling through of the control panel occurred because there is no requirement or business rationale for AEP to retain parts or equipment that are no longer in working order.**

4. State the date the control panel identified in response to the previous interrogatories was cycled through and also identify and state the current location of all documents which refer to or reference this date, including documents which state or indicate why this date was chosen.

**Answer:** The control panel was cycled through on June 18, 2010, the day when it was replaced. The date of replacement is indicated in the log book, which was produced in response to Complainant's previous Requests for Production.

5. Identify your employee or representative who is most knowledgeable about the business practices associated with the cycle through of the control panel as described in response to the interrogatories above.

**Answer:** Robert Hall is an employee who is knowledgeable about the business practices associated with the cycling through of equipment.

#### **REQUESTS FOR PRODUCTION**

1. Produce for inspection and copying all documents identified in your answers to Complainant's Second Set of Interrogatories.

**Response:** There are no documents identified in AEP's answers to Complainant's Second Set of Interrogatories.

Respectfully submitted,

/s/ Marilyn McConnell

Marilyn McConnell (0031190)

Sophia Chang (0086258)

American Electric Power Service Corporation

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*Counsel for Respondent*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Respondent Ohio Power Company's Objections and Responses to Complainant's Second Set of Interrogatories and Third Set of Requests for Production was served by electronic mail upon counsel for Complainant at the address listed below on this 1st day of October 2012.

/s// Marilyn McConnell

Marilyn McConnell

Daniel C. Theveny, Esq.  
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