

**Before
The Public Utilities Commission of Ohio**

RECEIVED-DOCKETING DIV
2008 SEP 15 PM 1:37
PUCO

**In the Matter of the Application
of Ohio Edison Company, the
Cleveland Electric Illuminating
Company and the Toledo Edison
Company for Approval of a
Market Rate Offer to Conduct a
Competitive Bidding Process for
Standard Service, Offer Electric
General Supply, Accounting
Modifications Associated with
Reconciliation Mechanism and
Tariffs for Generation Service**

)
)
)
)
)
)
)
)
)
)
)
)

Case No. 08-936-EL-SSO

**Responses of the Ohio Farm Bureau Federation to First Sets
of Interrogatories and Request for Production of Documents
of the FirstEnergy Companies**

Pursuant to Rules 4901-1-16, 4901-1-19, and 4901-1-20 of the Ohio Administrative Code, and the attorney examiner's entries in the above dockets of August 5, 2008 and August 7, 2008, respectively, the Ohio Farm Bureau Federation (OFBF) hereby provides the following responses to responses to the FirstEnergy Companies' First Sets of Interrogatories and Requests for Production of Documents concerning Case No. 08-936-EL-SSO as docketed with the Commission on September 4, 2008.

INTERROGATORIES

INTERROGATORY NO. 1: Identify each person whom You intend to call as a witness at the hearing in this Case.

RESPONSE: Although OFBF anticipates calling one or more witnesses in Case No. 08-936-EL-SSO, it has not yet determined the person(s) that will be called. OFBF will supplement this response when that determination is made.

This is to certify that the images appearing are an
accurate and complete reproduction of a case file
document delivered in the regular course of business.
Technician Ann Date Processed 9/15/08

INTERROGATORY NO. 2: For each person whom You intend to call as a witness at the hearing in this Case:

- a. State the substance of each opinion on which the witness will testify;
- b. State all facts which provide the basis for each opinion on which the witness will testify;
- c. Provide a summary of the witness's background and qualifications;
- d. Identify each document supplied to, reviewed by, relied on, or prepared by the witness in connection with his or her testimony in this Case; and
- e. Identify by caption, agency or court, case name, and case number all other proceedings in which the witness has testified on the same or a similar topic in the past ten years.

RESPONSE: With respect to Case No. 08-936-EL-SSO, please see Response to Interrogatory No. 1. OFBF will supplement this response when it determines which person(s) it will call as a witness.

INTERROGATORY NO. 3: Identify each and every document, exhibit or other thing You intend to introduce into evidence or otherwise display at the hearing in this Case.

RESPONSE: Other than the testimony of the witness or witnesses it ultimately calls, OFBF has not yet determined whether it will introduce into evidence or otherwise display any documents, exhibits, of other things at the hearing in Case No. 08-936-EL-SSO. OFBF will supplement this response when such determination is made.

INTERROGATORY NO. 4: Identify each and every adjustment, modification, or change to any proposal contained in the FirstEnergy Companies' Application in this Case that You propose or support or intend to propose or support.

RESPONSE: OFBF has not yet made a final determination with respect to these matters, but anticipates that it will propose in Case No. 08-936-EL-SSO support or modifications

relating to determination of the Competitive Bidding Process (CBP) Plan. OFBF will supplement this response when such final determination is made.

INTERROGATORY NO. 5: For any and all adjustments, modifications, or changes described in Your response to Interrogatory No. 4, Identify the following:

- a. All facts relied on by You that support the proposed adjustment, modification or change.
- b. All documents referring to, reflecting, or relating to the adjustment, modification or change.

RESPONSE: See response to Interrogatory No. 4. OFBF will supplement this response when the final determination described in said response is made.

INTERROGATORY NO. 6: Identify all communications concerning the FirstEnergy Companies' application, schedules, or proposals in this Case that You have had with any party or any representative of any party to this Case or any third party.

RESPONSE: OFBF personnel have had several limited telephone and/or direct conversations with personnel of the Office of the Ohio Consumers' Counsel during which the proposals contained in the application in Case No. 08-936-EL-SSO were mentioned and/or briefly discussed in general terms.

INTERROGATORY NO. 7: Identify all internal communications (including but not limited to communications involving Your consultants) concerning the FirstEnergy Companies' application, schedules, or proposals in this Case.

RESPONSE: With the exception of internal communications concerning the preparation of this document, OFBF has generated no further internal communications concerning FirstEnergy Companies' applications, schedules and/or proposals in this case. As of this filing, OFBF has not hired any outside consultants concerning this matter. Moreover, if and when to the extent that this interrogatory would require disclosure of communications with

in-house or outside OEC counsel, discovery is barred by the attorney-client privilege or protected as attorney work product.

INTERROGATORY NO. 8: Identify all documents You have generated, produced, or distributed (including but not limited to documents generated or produced by Your consultants) concerning the FirstEnergy Companies' application, schedules, or proposals in this Case.

RESPONSE: See Response to Interrogatory No. 7.

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1: All documents and things identified in response to the FirstEnergy Companies' First Set of Interrogatories.

RESPONSE: See Response to Interrogatory Nos. 7 and 8.

REQUEST FOR PRODUCTION NO. 2: All documents and things that reflect, refer to, or relate to any communication identified in response to the FirstEnergy Companies' First Set of Interrogatories.

RESPONSE: See Response to Interrogatory Nos. 7 and 8.

REQUEST FOR PRODUCTION NO. 3: A curriculum vitae for each witness.

RESPONSE: See response to Interrogatory No. 1. OFBF will provide the requested document(s) when it determines which person(s) it will call as a witness.

REQUEST FOR PRODUCTION NO. 4: All exhibits You intend to introduce at hearing.

RESPONSE: See Response to Interrogatory No. 3.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Larry Gearhardt". The signature is written in black ink and is positioned above the printed name and title.

Larry Gearhardt

Chief Legal Counsel

Ohio Farm Bureau Federation

280 North High Street, P.O. Box 182383

Columbus, OH 43218-2383


Phone: 614.246.8256

Fax: 614.246.8656

E-Mail: LGearhardt@ofbf.org

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been served upon the following parties by first class mail, postage prepaid, and/or by electronic mail this 15th day of September 2008.


Larry Gearhardt

James W. Burk
Arthur E. Korkosz
Mark A. Hayden
Ebony L. Miller
FirstEnergy
16 South Main Street
Akron, Ohio 44308

Janine L. Migden-Ostrander
Jeffrey M. Small
Jacqueline Lake Roberts
Richard C. Reese
Gregory J. Poulos
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485

David F. Boehm
Michael L. Kurtz
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, Ohio 45202

John W. Bentine
Mark S. Yurick
Matthew S. White
Chester, Willcox & Saxbe LLP
65 East State Street, Suite 1000
Columbus, Ohio 43215-4213

Samuel C. Randazzo
Lisa G. McAlister
Daniel J. Neilsen
Joseph M. Clark
MCNEES WALLACE & NURICK LLC
21 East State Street, 17th Floor
Columbus, Ohio 43215

David C. Rinebolt
Colleen L. Mooney
Ohio Partners for Affordable Energy
231 West Lima Street
P.O. Box 1793
Findlay, Ohio 45839-1793

Garrett A. Stone
Michael K. Lavanga
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, N.W.
8th Floor, West Tower
Washington, D.C. 20007

Leslie A. Kovacik
Senior Attorney, City of Toledo
420 Madison Ave., Suite 100
Toledo, Ohio 43604-1219

Lance M. Keiffer
Assistant Prosecuting Attorney
711 Adams Street, 2nd Floor
Toledo, Ohio 43624-1680

M. Howard Petricoff
Stephen M. Howard
VORYS, SATER, SEYMOUR AND PEASE LLP
52 East Gay Street
P. O. Box 1008
Columbus, Ohio 43216-1008

Larry Gearhardt
Ohio Farm Bureau Federation
280 North High Street, P.O. Box 182383
Columbus, OH 43218-2383

Glenn S. Krassen
BRICKER & ECKLER LLP
1375 East Ninth Street
Suite 1500
Cleveland, Ohio 44114

Gregory H. Dunn
Christopher L. Miller
Schottenstein Zox & Dunn Co., LPA
250 West Street
Columbus, Ohio 43215

R Mitchell Dutton
FPL Energy Power Marketing, Inc.
700 Universe Boulevard
CTR/JB
Juno Beach, Florida 33408

Langdon D. Bell
Bell & Royer Co., LPA
33 South Grant Avenue
Columbus, Ohio 43215-3927

Sean W. Vollman
David A. Muntean
Assistant Directors of Law
161 S. High Street, Suite 202
Akron, Ohio 44308

Henry W. Eckhart
50 West Broad Street #2117
Columbus, Ohio 43215

Joseph P. Meissner
The Legal Aid Society of Cleveland
1223 West 6th Street
Cleveland, Ohio 44113