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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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2008 SEP 22 PM 4: 57

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In the Matter of the Application of :
Columbus Southern Power Company for :
Approval of its Electric Security Plan; an : Case No. 08-917-EL-SSO
Amendment to its Corporate Separation :
Plan; and the Sale or Transfer of Certain :
Generation Assets. :

In the Matter of the Application of Ohio :
Power Company for Approval of its : Case No. 08-0918-EL-SSO
Electric Security Plan; and an Amendment :
To its Corporate Separation Plan. :

THE NATURAL RESOURCES DEFENSE COUNCIL'S RESPONSES TO
COLUMBUS SOUTHER POWER COMPANY'S AND OHIO POWER COMPANY'S FIRST SET OF
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO THE NATURAL RESOURCES DEFENSE COUNCIL

The Natural Resources Defense Council ("NRDC") hereby submits its Responses to the First Set of Interrogatories and Request for Production of Documents in the above captioned case submitted to NRDC on September 12, 2008.

NRDC has attempted to be responsive to each and every one of the requests submitted by the Columbus Southern Power Company's and the Ohio Power Company's ("AEP"). However, our responses to these interrogatories are being provided without waiver of several objections which are stated as part of our responses below. NRDC is working diligently to thoroughly examine the application and testimony of the AEP companies, and to review each of the discovery requests and responses that have been submitted. At this time, for example, we have not determined the substance of each opinion on which our witness will testify. Moreover, we reserve the right to submit testimony on behalf of additional witnesses we cannot yet identify. With these caveats in mind, and in the spirit of working

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cooperatively in these proceeding, we have provided all currently available information that is responsive to the AEP companies' requests.

GENERAL OBJECTIONS

1. NRDC objects to data requests that expand NRDC's obligations beyond those in the rules of discovery contained in the Ohio Administrative Code, section 4901-1-16(B).
2. NRDC objects to data requests that would seek to require disclosure of information or communications protected by attorney-client privilege or other applicable privilege.

INTERROGATORIES

INTERROGATORY NO. 1: For each consultant that NRDC retains for this proceeding, please describe in detail the scope of the consultant's engagement, including the subject matters, issues, and positions regarding which the consultant will analyze and advise NRDC. If NRDC has not yet determined a particular subject matter, issue, or position regarding which the consultant will analyze and advise NRDC, please promptly provide a description as soon as you have determined it.

RESPONSE: Objection. NRDC is in the process of determining which issues, if any, upon which it will engage outside experts to advise staff on the AEP filing. NRDC houses considerable expertise among our Staff on issues related to energy efficiency programs, rate design for energy efficiency cost recovery, long-term utility planning and compliance with renewable energy standards. If we determine that outside expertise is necessary to fully address one or more issue areas in this case, we will provide AEP with a description of the scope and purpose of such engagement.

INTERROGATORY NO. 2. Please Identify each witness the NRDC will present at the hearing for the Companies ESP proceeding. To the extent that NRDC does not know yet who all the

witnesses are that it will present at the hearing, please promptly identify each witness as soon as NRDC does determine that it will present the witness at the hearing.

RESPONSE NO. 2. Objection. Again, NRDC is currently in the process of analyzing the AEP Companies application and testimony in the above captioned cases. NRDC has not yet determined who will testify at the hearing, but will promptly identify each witness as soon as that determination has been made.

INTERROGATORY NO. 3: For each witness that NRDC identifies in responses to the previous Interrogatory, please describe in detail the expected scope and purpose of the witness's testimony, including the subject matters, issues, and positions regarding which the witness will present testimony on behalf of NRDC. If NRDC has not yet identified a particular witness that it will present at the hearing, or if NRDC has not yet determined the particular subject matter, issue, or position regarding which the witness will present testimony on behalf of NRDC, please promptly provide a description as soon as you identified it.

RESPONSE: Objection. See Response to Interrogatory No. 2.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Provide a copy of each document identified or referenced to in your responses to Interrogatories 1-3.

RESPONSE: Objection. See Responses to Interrogatories 1-3

2. Please provide copies of NRDC's responses to data request that any other party submits to NRDC. This request is continuing.

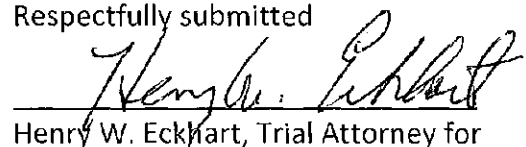
RESPONSE: Objection. No other party has submitted a data request to NRDC at this time.

3. For each witness identified in response to Interrogatory No. 2, please provide copies of all workpapers and other backup documentations supporting the testimony of each witness that testifies on behalf of NRDC. Each workpaper should be identified in a manner that links it to the particular witness's testimony that the workpaper supports and to the particular issue addressed by, or to the specific/exhibit attached to, that witness's testimony. Please provide the workpapers by no later than the time the testimony is filed.

RESPONSE: Objection. See RESPONSE TO Interrogatory No. 2.

Note: the above responses were provided by Rebecca Stanfield of the Chicago Office of NRDC. The Objections are made by Henry W. Eckhart, as attorney for NRDC.

Respectfully submitted



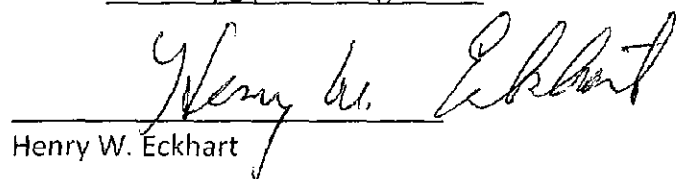
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CERTIFICATE OF SERVICE

I hereby certify that a copy of The Natural Resources Defense Council's Responses were served by E-mail on the following counsel by E-mail on the 22nd day of September, 2008.

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