

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

PUCO

2010 APR -8 PM 4:53

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In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan.

Case No. 10-388-EL-SSO

**RESPONSES OF THE NATURAL RESOURCES DEFENSE COUNCIL TO THE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF
OHIO EDISON COMPANY, THE CLEVELAND ELECTRIC ILLUMINATING
COMPANY, AND THE TOLEDO EDISON COMPANY TO THE NATURAL
RESOURCES DEFENSE COUNCIL
(DATED MARCH 31, 2010)**

INT-1: Identify each person whom You intend to call as an expert witness at the hearing in this matter.

Response: Dylan E. Sullivan

INT-2: For each person You intend to call as an expert witness at the hearing in this matter:

a: State the substance of each opinion on which the witness will testify, including every adjustment, modification, or change to the Companies' application that the witness intends to propose or support;

b: State all facts which provide the basis for each opinion on which the witness will testify;

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- 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 matter; 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: a: The witness is still reviewing the case and has not yet determined "the substance of each opinion" on which he will testify, but he will, at minimum, testify on the lost revenue recovery allowed in the Stipulation and Recommendation and also the Application of the Companies in this case. The witness may also discuss the process the Stipulation proposes for purchasing renewable energy credits.

b: The witness will, at a minimum, utilize the language in the Stipulation and Recommendation to provide the basis for each opinion on which he will testify and also the Application of the Companies in this case and the Application in Case No. 09-1947-EL-POR. Other facts, not yet reviewed by the witness, may be used.

c: Such a summary can be found in the witness's response to Question 2 of the Direct Testimony of Dylan E. Sullivan, filed on February 17, 2010 in Case No. 09-1947-EL-POR, et al.

d: The witness will, at a minimum, rely upon the Stipulation and Recommendation filed in this case and the Companies' application in Case No.

09-1947-EL-POR. The witness may rely on other documents, unknown at this time.

e: PUCO Case No. 08-935-EL-SSO and PUCO Case No. 09-1947-EL-POR, et al.

INT-3: Identify each and every document, exhibit, or other thing You intend to introduce into evidence or otherwise display at the hearing in this matter.

Response: This has yet to be determined.

RFP-1: All documents and things identified in response to the Companies' First Set of Interrogatories.

Response: The documents identified (the Stipulation and Recommendation and Application in this case and the Application in Case No. 09-1947-EL-POR) are either already in the Companies' possession or have not been created.

RFP-2: A curriculum vitae for each witness.

Response: The response to INT-2c above contains the requested information on the qualifications and background of Dylan Sullivan

RFP-3: All exhibits You intend to introduce at the hearing.

Response: The testimony of Dylan Sullivan and possible exhibits have not yet been prepared.

RFP-4: All documents and things supplied to, relied upon, reviewed by, or prepared by any expert witness identified in response to Interrogatory No. 1 in connection with his or her testimony in this matter.

Response: The testimony of the witness will rely upon, at minimum, the Stipulation and Recommendation and Application in this case and the Application in Case No. 09-1947-EL-POR, which are already in the Company's possession.

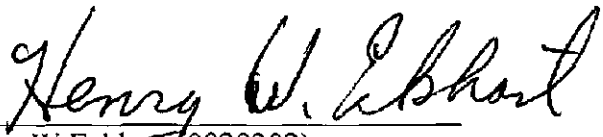
I hereby swear that the foregoing responses are true to the best of my knowledge and belief.

/s/ Dylan Sullivan

Dylan Sullivan
Energy Advocate, Midwest Office
Natural Resources Defense Council
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CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing RESPONSES OF THE NATURAL RESOURCES DEFENSE COUNCIL TO THE INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF OHIO EDISON COMPANY, THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, AND THE TOLEDO EDISON COMPANY, was served upon the persons listed below via electronic mail on this 8th day of April, 2010.


Henry W Eckhart (0020202)
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