

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)		
Edison Company, The Cleveland Electric)	Case Nos.	12-2190-EL-POR
Illuminating Company, and The Toledo)		12-2191-EL-POR
Edison Company For Approval of Their)		12-2192-EL-POR
Energy Efficiency and Peak Demand)		
Reduction Portfolio Plans for 2013 through)		
2015)		

**NATURAL RESOURCES DEFENSE COUNCIL’S FIRST SET OF
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO
FIRSTENERGY**

For purposes of these requests, the following definitions apply:

1. **“Identify”** or **“identify”** means to state or a statement of:
 - a) in the case of a person other than a natural person, its name, the address of its principal place of business, and its telephone number;
 - b) in the case of a natural person, his or her name, business address and telephone number, employer, title or position, duties, obligations or responsibilities, and date of separation from your organization or company, if applicable;
 - c) in the case of a communication, its date, type (*e.g.*, telephone conversation, letter, or meeting), the place where it occurred, the identity of each person who received or made the communication or who was present when it was received or made, and the subject matter discussed; and
 - d) in the case of a document or other writing, its date, title, and subject matter, as well as the name, address, and telephone number of the authority or other

person(s) responsible for its preparation and the name, address, and telephone number of the person(s) presently having custody of the document.

2. **“You”** or **“yours”** means FirstEnergy, Ohio Edison Company, Toledo Edison Company, and Cleveland Electric Illuminating Company, as well as any of its agents, legal representatives, consultants, experts, all representatives and other persons acting on its behalf, and its present and former employees.
3. **“Person”** means any natural person, corporation, firm, company, sole proprietorship, partnership, joint venture, association, institute, or other business or legal entity and all present and former directors, officers, employees, agents, consultants or other persons acting for or on behalf of any such person.
4. **“Document”** includes any written or graphic material, however produced or reproduced, including, but not limited to: prepared speeches, articles, papers, treatises, books, memoranda or white papers, correspondence, or other written, typed, or printed communications, notes in any form, voice recording tapes, videotapes, microfilms, microfiche, pictures, data processing cards or disks, computer generated or stored information or databases, now or previously in your possession. If a document has been destroyed or is otherwise unavailable, such should be indicated in the response.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Provide machine-readable, Microsoft Excel-compatible copies of all tables in Attachment A (including Appendices A, B, C, and E), Attachment B (including Appendices A, B, C, and E), and Attachment C (including Appendices A, B, C, and E).

2. Provide machine-readable, Microsoft Excel-compatible copies of Exhibit BDE-1, Exhibit BDE-3, Exhibit ECM-1, Exhibit ECM-2, Exhibit ECM-3, Exhibit EGD-1, Exhibit EGD-2, Exhibit EGD-3, and Exhibit EGD-4.

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing First Set of Interrogatories and Request for Production of Documents has been filed with the Public Utilities Commission of Ohio and has been served upon the following parties via electronic mail on August 01, 2012.

/s/ Todd M. Williams
Todd M. Williams

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in

Case No(s). 12-2190-EL-POR, 12-2191-EL-POR, 12-2192-EL-POR

Summary: Request First Set of Interrogatories and Production of Documents electronically filed by Mr. Todd M Williams on behalf of Natural Resources Defense Council