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April 2, 2001

Via Federal Express

Ms. Dorothy Wideman
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way
Lansing, MI 48911

RE: Case No. U-12655
In the matter of the application of Alpena Power Company
for approval of its plan to implement 2000 PA 14 1

Dear Ms. Wideman:

Enclosed for filing are an original and four copies of Response of Alpena Power Company to Staffs Motion To Strike. Also enclosed please find a Proof of Service. This tiling is also being made pursuant to the Commission's electronic tiling pilot program.

Very truly yours,

James D. Florip

JDF:jrm

Enc.

cc: S. Mitchell
Parties of Record

S T A T E O F M I C H I G A N

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter of the application of **ALPENA POWER COMPANY** for approval of its plan to implement 2000 PA 141	)))))	**Case No. U-12655**

PROOF OF SERVICE

Janet R. Misiak, being first duly sworn, deposes and states that on the 19th day of February, 2001, she served a copy of the **Response of Alpena Power Company To Staff's Motion To Strike** upon the following persons:

Larry Watterworth
Assistant Attorney General
Public Service Division
6545 Mercantile Way, Ste. 15
Lansing, MI 48911

Brian Coyer
Knaggs, Harter, Brake & Schneider, P.C.
1375 S. Washington Ave., Ste. 300
Lansing, MI 48910

Richard J. Aaron
Honigman, Miller, Schwartz & Cohn
222 N. Washington Sq., Ste. 400
Lansing, MI 48933

Harvey J. Messing
Sherri A. Wellman
Loomis, Ewert, Parsley, David & Gotting
232 S. Capitol Ave., Ste. 1000
Lansing, MI 48933

Christine M. Soneral
Dykema Gossett
800 Michigan National Tower
Lansing, MI 48933

Robert A. LeFevre
Clark Hill PLC
2455 Woodlake Circle
Okemos, MI 48864

Don L. Keskey
Knaggs, Harater, Brake & Schneider, P.C.
1375 S. Washington Ave., Ste. 300
Lansing, MI 48910

Marc E. Lewis
Indiana Michigan Power Company
One Summit Square, P.O. Box 60
Fort Wayne, IN 46801-0060

1st Class Mail with proper postage affixed thereto.

Janet R. Misiak

Janet R. Misiak

Subscribed and sworn to before me
this 2nd day of April, 2001.

Patricia D. Hiske

Patricia D. Hiske, Notary Public
Alpena County, Michigan
My commission expires: 06-28-2002

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the Matter of the Application of **WISCONSIN ELECTRIC POWER COMPANY** and **EDISON SAULT ELECTRIC COMPANY** for approval of its plan to implement 2000 PA 141. /	**Case No. U-12649**
In the Matter of the Application of **WISCONSIN PUBLIC SERVICE CORPORATION** and **UPPER PENINSULA POWER COMPANY** for approval of their plan to implement 2000 PA 141. /	**Case No. U-12650**
In the Matter of the Application of **NORTHERN STATES POWER COMPANY - WISCONSIN, d/b/a Xcel Energy**, for approval of its plan to implement 2000 PA 141. /	**Case No. U-12651**
In the Matter of the Application of **INDIANA MICHIGAN POWER COMPANY, d/b/a AEP**, for approval of its plan to implement 2000 PA 141. /	**Case No. U-12652**
In the Matter of the Application of **ALPENA POWER COMPANY** for approval of its plan to implement 2000 PA 141. /	**Case No. U-12655**

ALPENA POWER COMPANY'S RESPONSE
IN SUPPORT OF
MICHIGAN PUBLIC SERVICE COMMISSION STAFF'S
MOTION TO STRIKE TESTIMONY AND EXHIBITS OF:
Martin G. Kushler in U-12649, U-12650, U-12651, U-12652 and U-12655;
Geoffrey J. Crandall in U-12613, U-12649, U-12651 and U-12652;
Ronald C. Callen in U-12649, U-12650, U-12652 and U-12652

Alpena Power Company ("Alpena") by and through its attorney James D. Florip, files this response in support of the Michigan Public Service Commission Staff's ("Staff") motion to strike portions of testimony in the above cases, consolidated for hearing purposes only.

1. Alpena supports the Staff in its Motion To Strike the various testimony and exhibits as listed by Staff in its motion as it may apply to the consolidated hearing.

2. Alpena supports the Staff in its Motion To Strike as it specifically applies to Alpena in Case U-12655, as to:

a. Any testimony and exhibits filed by a proper party, i.e. one who has petitioned for and was granted intervention in Alpena's Case No. U-12655

b. Anytestimonyactuallyfiled byanadmittedinterveningpartyin Alpena's Case No. U-12655.

Dated: April 2, 2001

Respectfully submitted,

BY: _____

James D. Florip (P26861)
Gillard, Bauer, Mazrum, Florip, Smigelski and Gulden
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109 E. Chisholm
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