AFFIDAVIT OF JOSEPH OLIKER

State of Ohio : S.S.

County of Franklin :

I, Joseph Oliker, counsel for Interstate Gas Supply, Inc. ("IGS" or "IGS Energy") in Case Nos. 14-1693-EL-RDR, *et al.*, being first duly sworn, depose and say:

1. On December 23, 2015, the Office of Consumers' Counsel ("OCC") served a notice of deposition on IGS related to a Stipulation and Recommendation filed in the above-captioned proceeding. The notice requested that IGS present an unnamed witness on December 30, 2015.

2. On December 28, 2015, I had a conversation with OCC's counsel in which I indicated that IGS objected to OCC's request for a deposition because it seeks duplicative testimony or testimony that was already provided at an earlier stage of the proceeding. I further indicated that the notice of deposition appears to seek information outside the scope of discovery, including communications or information protected by settlement privilege, attorney client privilege, or word product doctrine. I indicated that IGS would attempt to respond to discovery responses issued by OCC to resolve this matter, but that IGS objected to presenting a witness for deposition.

3. On December 28, 2015, I served responses and objections to over 50 discovery requests served by OCC on IGS related to the above-captioned proceeding.

4. On December 29, 2015, I filed correspondence in the above-captioned proceeding providing formal notice of IGS's objection to OCC's notice of deposition.

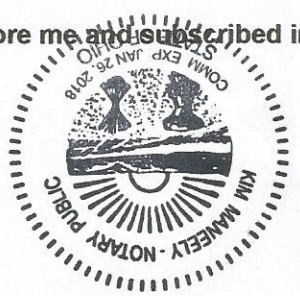
5. On December 29, 2015, OCC served a subpoena on IGS requesting that IGS present an unnamed witness at Public Utilities Commission of Ohio ("Commission") hearing in Case No. 14-1693-EL-RDR, *et al.* on January 4, 2015. The subpoena requested that IGS present a witness to testify with respect to the same categories of information identified in the notice of deposition.

6. On December 31, 2015, I contacted OCC's counsel to determine if the parties could resolve the outstanding discovery-related issues with respect to the subpoena and notice of deposition without Commission intervention. The parties, however, were not able to agree to a compromise solution.

7. After communicating with OCC's counsel and attempting to resolve this matter, it is apparent that this dispute cannot be resolved without the issuance of orders from the Commission.

Joseph Oliker

Sworn before me and subscribed in my presence this 31st day of December, 2015



Notary Public
State of Ohio