**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| |  | | --- | | In the Matter of the Application Seeking Approval of Ohio Power Company’s Proposal to Enter into an Affiliate Power Purchase Agreement for Inclusion in the Power Purchase Agreement Rider.  In the Matter of the Application of Ohio Power Company for Approval of Certain Accounting Authority. | | )  )  )  )  )  )  )  )  ) | |  | | --- | | Case No. 14-1693-EL-RDR | | Case No. 14-1694-EL-AAM | |

**NOTICE TO TAKE DEPOSITIONS**

**AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

**BY**

**THE OFFICE OF THE OHIO CONSUMERS’ COUNSEL**

Pursuant to Ohio Adm. Code Rule 4901-1-21(B), please take notice that the Office of the Ohio Consumers’ Counsel (“OCC”) will take the oral deposition of F. Stuart Bresler, III on Thursday, December 31, 2015, commencing at 1 p.m.

OCC seeks to conduct the deposition Mr. Bresler upon oral examination at OCC’s office, 10 W. Broad St., 18th Floor, Columbus, Ohio, at 1:00 p.m. beginning on Thursday, December 31, 2015. These depositions will continue, from day to day, except for holidays and weekends, until completed. Each deponent will appear at the OCC at the designated time and date with all requested documents (identified below) and remain present until deposed.

The depositions will be taken of the aforementioned deponent on relevant topics within the scope of these proceedings, including but not limited to, Mr. Bresler's testimony filed on December 28, 2015 in this proceeding, Ohio Power’s proposal to enter into an affiliate power purchase agreement for inclusion in the power purchase agreement rider, the Joint Stipulation and Recommendation (“Joint Stipulation”) filed on December 15, 2015 in this case, and Ohio Power’s Application filed on October 3, 2014,. The deposition will be taken upon oral examination (as upon cross-examination) before an officer authorized by law to take depositions.

Pursuant to Ohio Adm. Code Rules 4901-1-21(E) and 4901-1-20, F. Stuart Bresler, III is requested to produce at his deposition, all documents relating to his/her responsibilities with respect to Case Nos. 14-1693-EL-RDR and Case No. 14-1694-EL-AAM. Additionally, the deponent shall bring documents, including, but not limited to, the results of any studies or analyses done for these proceedings and any backup documents, including raw data for such studies or analyses, workpapers, and any documents relied upon or referred to when drafting his pre-filed testimony in this proceeding.

OCC recognizes that Ohio Power Company (“AEP Ohio) has filed a Notice of Deposition of F. Stuart Bresler, III that is scheduled to take place at the offices on Porter Wright Morris & Arthur, LLP, beginning at 9 a.m., on Thursday, December 31, 2015, and OCC intends to participate in these depositions. If Ohio Power’s deposition of Mr. Bresler is canceled, then OCC’s deposition of F. Stuart Bresler, III will commence at 1 p.m. on December 31, 2015 at the OCC’s office. If, however, AEP Ohio’s scheduled deposition of Mr. Bresler proceeds as scheduled at 9:00 a.m. on December 31, 2015, then OCC plans to participate and will not need to go forward with its noticed deposition.

Respectfully submitted,

BRUCE J. WESTON (Reg. No. 0016973)

CONSUMERS’ COUNSEL

*/s/ William J. Michael*

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Notice to Take Depositions and Requests for Production of Documents was served via electronic service upon the parties this 30th day of December, 2015.

*/s/ William J. Michael*

William J. Michael

Assistant Consumers’ Counsel

**SERVICE LIST**

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