



155 East Broad Street  
20<sup>th</sup> Floor  
Columbus, Ohio, 43215

o: 614-222-1330  
f: 614-222-1337

February 27, 2018

Ms. Barcy F. McNeal, Secretary  
Public Utilities Commission of Ohio  
180 East Broad Street, 11<sup>th</sup> Floor  
Columbus, Ohio 43215

Re: Case No. 17-2344-EL-CSS, In the Matter of the Complaint of Citizens Against Clear Cutting, et. al. v. Duke Energy Ohio, Inc. Second Amended Notices of Deposition

Dear Ms. McNeal:

Please find attached the Revised Amended Notices of Deposition for the following Complainants in the above referenced case:

Dennis Baker;  
Joseph Grossi;  
John Gump;  
Kenneth Bryant;  
Karen Dabdoub;  
Mark Thompson; and  
Marc Wahlquist.

The Amended Notices of Deposition have been revised to reflect a correction of the address where depositions will take place. Should you have any questions, please do not hesitate to contact us.

Sincerely,

*Emily A. Olive, CP*

Emily A. Olive  
Paralegal

**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of Citizens	)	
Against Clear Cutting, Et Al.,	)	
	)	
Complainants,	)	
v.	)	Case No. 17-2344-EL-CSS
	)	
Duke Energy Ohio, Inc.,	)	
	)	
Respondent.	)	

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**AMENDED NOTICE OF DUKE ENERGY OHIO, INC.,  
TO TAKE DEPOSITION *DUCES TECUM* OF  
DENNIS BAKER**

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Pursuant to Ohio Admin. Code Rule 4901-1-21(B), please take notice that Duke Energy Ohio, Inc., (Duke Energy) will take the oral deposition of Dennis Baker (Mr. Baker) and all witnesses whom Mr. Baker intends to rely upon at hearing and any persons on whom Mr. Baker relied upon in forming his opinion in the above captioned matter, on March 2, 2018 beginning at 11 A.M. and continuing day-to-day thereafter until complete.

The depositions will take place at the Symmes Township Safety Center, 8871 Weekly Lane, Cincinnati, OH 45249. The depositions will be taken upon oral examination (as if on cross-examination) before an officer authorized by law to take depositions.

Pursuant to Ohio Admin. Code 4901-1-21(E) and 4901-1-20, all witnesses are requested to produce at the time of their deposition true and accurate copies of the documents identified in Exhibit A.

Parties are invited to attend and to cross-examine.

Respectfully submitted,

/s/ Elizabeth H. Watts

Rocco O. D'Ascenzo (0077651)

Deputy General Counsel

Elizabeth H. Watts (0031092)

Associate General Counsel

DUKE ENERGY OHIO, INC.

139 East Fourth Street

1303-Main

P.O. Box 960

Cincinnati, Ohio 45202

Telephone: (513) 287-4320

[Rocco.D'Ascenzo@duke-energy.com](mailto:Rocco.D'Ascenzo@duke-energy.com)

[Elizabeth.Watts@duke-energy.com](mailto:Elizabeth.Watts@duke-energy.com)

Robert A. McMahon (0064319)

Eberly McMahon Copetas LLC

2321 Kemper Lane, Suite 100

Cincinnati, Ohio 45206

(513) 533-3441 (telephone)

(513) 533-3554 (fax)

[bmcmahon@emclawyers.com](mailto:bmcmahon@emclawyers.com)

Attorneys for Duke Energy Ohio, Inc.

## **EXHIBIT A**

Duke Energy Ohio hereby requests that, at the time and place set forth above in the notice of deposition, *duces tecum*, each deponent produce true and accurate copies of the following documents:

1. Any and all documents that were reviewed by said deponent for purposes of preparing direct testimony relative to the above-captioned proceeding.
2. Any and all documents created or authored by said deponent for purposes of preparing direct testimony relative to the above-captioned proceeding.
3. Any and all documents referenced in the witness's direct testimony relative to the above-captioned proceeding.
4. Any and all documents reviewed by said deponent in preparing, or otherwise assisting in the preparation of, discovery responses submitted by Mr. Baker relative to the above-captioned proceeding.
5. Any and all documents prepared by said deponent for purposes of preparing, or otherwise assisting in the preparation of, discovery responses submitted by Mr. Baker relative to the above-captioned proceeding.

## **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a copy of the foregoing was served on the following parties of record by electronic service, this 27<sup>th</sup> day of February, 2018.

/s/ Elizabeth H. Watts  
Elizabeth H. Watts

<p>Kimberly W. Bojko Stephen E. Dutton Brian W. Dressel Carpenter Lipps &amp; Leland LLP 280 Plaza, Suite 1300 280 North High Street Columbus, OH 43215 <a href="mailto:bojko@carpenterlipps.com">bojko@carpenterlipps.com</a> <a href="mailto:Dutton@carpenterlipps.com">Dutton@carpenterlipps.com</a> <a href="mailto:dressel@carpenterlipps.com">dressel@carpenterlipps.com</a></p> <p><b>Counsel for Complainants</b></p>	<p>Terry L. Etter Assistant Consumers' Counsel Office of the Ohio Consumers' Counsel 65 East State Street, 7<sup>th</sup> Floor Columbus, Ohio 43215-4313 <a href="mailto:terry.etter@occ.ohio.gov">terry.etter@occ.ohio.gov</a></p> <p><b>Counsel for Office of the Ohio Consumers' Counsel</b></p>
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**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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Against Clear Cutting, Et Al.,	)	
	)	
Complainants,	)	
v.	)	Case No. 17-2344-EL-CSS
	)	
Duke Energy Ohio, Inc.,	)	
	)	
Respondent.	)	

---

**AMENDED NOTICE OF DUKE ENERGY OHIO, INC.,  
TO TAKE DEPOSITION *DUCES TECUM* OF  
JOSEPH GROSSI**

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Pursuant to Ohio Admin. Code Rule 4901-1-21(B), please take notice that Duke Energy Ohio, Inc., (Duke Energy) will take the oral deposition of Joseph Grossi (Mr. Grossi) and all witnesses whom Mr. Grossi intends to rely upon at hearing and any persons on whom Mr. Grossi relied upon in forming his opinion in the above captioned matter, on March 2, 2018 beginning at 2 P.M. and continuing day-to-day thereafter until complete.

The depositions will take place at the Symmes Township Safety Center, 8871 Weekly Lane, Cincinnati, OH 45249. The depositions will be taken upon oral examination (as if on cross-examination) before an officer authorized by law to take depositions.

Pursuant to Ohio Admin. Code 4901-1-21(E) and 4901-1-20, all witnesses are requested to produce at the time of their deposition true and accurate copies of the documents identified in Exhibit A.

Parties are invited to attend and to cross-examine.

Respectfully submitted,

/s/ Elizabeth H. Watts

Rocco O. D'Ascenzo (0077651)

Deputy General Counsel

Elizabeth H. Watts (0031092)

Associate General Counsel

DUKE ENERGY OHIO, INC.

139 East Fourth Street

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P.O. Box 960

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[bmcmahon@emclawyers.com](mailto:bmcmahon@emclawyers.com)

Attorneys for Duke Energy Ohio, Inc.

## **EXHIBIT A**

Duke Energy Ohio hereby requests that, at the time and place set forth above in the notice of deposition, *duces tecum*, each deponent produce true and accurate copies of the following documents:

1. Any and all documents that were reviewed by said deponent for purposes of preparing direct testimony relative to the above-captioned proceeding.
2. Any and all documents created or authored by said deponent for purposes of preparing direct testimony relative to the above-captioned proceeding.
3. Any and all documents referenced in the witness's direct testimony relative to the above-captioned proceeding.
4. Any and all documents reviewed by said deponent in preparing, or otherwise assisting in the preparation of, discovery responses submitted by Mr. Grossi relative to the above-captioned proceeding.
5. Any and all documents prepared by said deponent for purposes of preparing, or otherwise assisting in the preparation of, discovery responses submitted by Mr. Grossi relative to the above-captioned proceeding.



## **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a copy of the foregoing was served on the following parties of record by electronic service, this 27<sup>th</sup> day of February, 2018.

/s/ Elizabeth H. Watts  
Elizabeth H. Watts

<p>Kimberly W. Bojko Stephen E. Dutton Brian W. Dressel Carpenter Lipps &amp; Leland LLP 280 Plaza, Suite 1300 280 North High Street Columbus, OH 43215 <a href="mailto:bojko@carpenterlipps.com">bojko@carpenterlipps.com</a> <a href="mailto:Dutton@carpenterlipps.com">Dutton@carpenterlipps.com</a> <a href="mailto:dressel@carpenterlipps.com">dressel@carpenterlipps.com</a></p> <p><b>Counsel for Complainants</b></p>	<p>Terry L. Etter Assistant Consumers' Counsel Office of the Ohio Consumers' Counsel 65 East State Street, 7<sup>th</sup> Floor Columbus, Ohio 43215-4313 <a href="mailto:terry.etter@occ.ohio.gov">terry.etter@occ.ohio.gov</a></p> <p><b>Counsel for Office of the Ohio Consumers' Counsel</b></p>
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**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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Complainants,	)	
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Duke Energy Ohio, Inc.,	)	
	)	
Respondent.	)	

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**AMENDED NOTICE OF DUKE ENERGY OHIO, INC.,  
TO TAKE DEPOSITION *DUCES TECUM* OF  
JOHN GUMP**

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Pursuant to Ohio Admin. Code Rule 4901-1-21(B), please take notice that Duke Energy Ohio, Inc., (Duke Energy) will take the oral deposition of John Gump (Mr. Gump) and all witnesses whom Mr. Gump intends to rely upon at hearing and any persons on whom Mr. Gump relied upon in forming his opinion in the above captioned matter, on March 2, 2018 beginning at 5 P.M. and continuing day-to-day thereafter until complete.

The depositions will take place at the Symmes Township Safety Center, 8871 Weekly Lane, Cincinnati, OH 45249. The depositions will be taken upon oral examination (as if on cross-examination) before an officer authorized by law to take depositions.

Pursuant to Ohio Admin. Code 4901-1-21(E) and 4901-1-20, all witnesses are requested to produce at the time of their deposition true and accurate copies of the documents identified in Exhibit A.

Parties are invited to attend and to cross-examine.

Respectfully submitted,

/s/ Elizabeth H. Watts

Rocco O. D'Ascenzo (0077651)

Deputy General Counsel

Elizabeth H. Watts (0031092)

Associate General Counsel

DUKE ENERGY OHIO, INC.

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[bmcmahon@emclawyers.com](mailto:bmcmahon@emclawyers.com)

Attorneys for Duke Energy Ohio, Inc.

## **EXHIBIT A**

Duke Energy Ohio hereby requests that, at the time and place set forth above in the notice of deposition, *duces tecum*, each deponent produce true and accurate copies of the following documents:

1. Any and all documents that were reviewed by said deponent for purposes of preparing direct testimony relative to the above-captioned proceeding.
2. Any and all documents created or authored by said deponent for purposes of preparing direct testimony relative to the above-captioned proceeding.
3. Any and all documents referenced in the witness's direct testimony relative to the above-captioned proceeding.
4. Any and all documents reviewed by said deponent in preparing, or otherwise assisting in the preparation of, discovery responses submitted by Mr. Gump relative to the above-captioned proceeding.
5. Any and all documents prepared by said deponent for purposes of preparing, or otherwise assisting in the preparation of, discovery responses submitted by Mr. Gump relative to the above-captioned proceeding.

## **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a copy of the foregoing was served on the following parties of record by electronic service, this 27<sup>th</sup> day of February, 2018.

/s/ Elizabeth H. Watts  
Elizabeth H. Watts

<p>Kimberly W. Bojko Stephen E. Dutton Brian W. Dressel Carpenter Lipps &amp; Leland LLP 280 Plaza, Suite 1300 280 North High Street Columbus, OH 43215 <a href="mailto:bojko@carpenterlipps.com">bojko@carpenterlipps.com</a> <a href="mailto:Dutton@carpenterlipps.com">Dutton@carpenterlipps.com</a> <a href="mailto:dressel@carpenterlipps.com">dressel@carpenterlipps.com</a></p> <p><b>Counsel for Complainants</b></p>	<p>Terry L. Etter Assistant Consumers' Counsel Office of the Ohio Consumers' Counsel 65 East State Street, 7<sup>th</sup> Floor Columbus, Ohio 43215-4313 <a href="mailto:terry.etter@occ.ohio.gov">terry.etter@occ.ohio.gov</a></p> <p><b>Counsel for Office of the Ohio Consumers' Counsel</b></p>
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	)	
Duke Energy Ohio, Inc.,	)	
	)	
Respondent.	)	

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**AMENDED NOTICE OF DUKE ENERGY OHIO, INC.,  
TO TAKE DEPOSITION *DUCES TECUM* OF  
KENNETH BRYANT**

---

Pursuant to Ohio Admin. Code Rule 4901-1-21(B), please take notice that Duke Energy Ohio, Inc., (Duke Energy) will take the oral deposition of Kenneth Bryant (Mr. Bryant) and all witnesses whom Mr. Bryant intends to rely upon at hearing and any persons on whom Mr. Bryant relied upon in forming his opinion in the above captioned matter, on March 2, 2018 beginning at 3 P.M. and continuing day-to-day thereafter until complete.

The depositions will take place at the Symmes Township Safety Center, 8871 Weekly Lane, Cincinnati, OH 45249. The depositions will be taken upon oral examination (as if on cross-examination) before an officer authorized by law to take depositions.

Pursuant to Ohio Admin. Code 4901-1-21(E) and 4901-1-20, all witnesses are requested to produce at the time of their deposition true and accurate copies of the documents identified in Exhibit A.

Parties are invited to attend and to cross-examine.

Respectfully submitted,

/s/ Elizabeth H. Watts

Rocco O. D'Ascenzo (0077651)

Deputy General Counsel

Elizabeth H. Watts (0031092)

Associate General Counsel

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[bmcmahon@emclawyers.com](mailto:bmcmahon@emclawyers.com)

Attorneys for Duke Energy Ohio, Inc.

## **EXHIBIT A**

Duke Energy Ohio hereby requests that, at the time and place set forth above in the notice of deposition, *duces tecum*, each deponent produce true and accurate copies of the following documents:

1. Any and all documents that were reviewed by said deponent for purposes of preparing direct testimony relative to the above-captioned proceeding.
2. Any and all documents created or authored by said deponent for purposes of preparing direct testimony relative to the above-captioned proceeding.
3. Any and all documents referenced in the witness's direct testimony relative to the above-captioned proceeding.
4. Any and all documents reviewed by said deponent in preparing, or otherwise assisting in the preparation of, discovery responses submitted by Mr. Bryant relative to the above-captioned proceeding.
5. Any and all documents prepared by said deponent for purposes of preparing, or otherwise assisting in the preparation of, discovery responses submitted by Mr. Bryant relative to the above-captioned proceeding.



## **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a copy of the foregoing was served on the following parties of record by electronic service, this 27<sup>th</sup> day of February, 2018.

/s/ Elizabeth H. Watts  
Elizabeth H. Watts

<p>Kimberly W. Bojko Stephen E. Dutton Brian W. Dressel Carpenter Lipps &amp; Leland LLP 280 Plaza, Suite 1300 280 North High Street Columbus, OH 43215 <a href="mailto:bojko@carpenterlipps.com">bojko@carpenterlipps.com</a> <a href="mailto:Dutton@carpenterlipps.com">Dutton@carpenterlipps.com</a> <a href="mailto:dressel@carpenterlipps.com">dressel@carpenterlipps.com</a></p> <p><b>Counsel for Complainants</b></p>	<p>Terry L. Etter Assistant Consumers' Counsel Office of the Ohio Consumers' Counsel 65 East State Street, 7<sup>th</sup> Floor Columbus, Ohio 43215-4313 <a href="mailto:terry.etter@occ.ohio.gov">terry.etter@occ.ohio.gov</a></p> <p><b>Counsel for Office of the Ohio Consumers' Counsel</b></p>
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**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of Citizens	)	
Against Clear Cutting, Et Al.,	)	
	)	
Complainants,	)	
v.	)	Case No. 17-2344-EL-CSS
	)	
Duke Energy Ohio, Inc.,	)	
	)	
Respondent.	)	

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**AMENDED NOTICE OF DUKE ENERGY OHIO, INC.,  
TO TAKE DEPOSITION *DUCES TECUM* OF  
KAREN DABDOUB**

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Pursuant to Ohio Admin. Code Rule 4901-1-21(B), please take notice that Duke Energy Ohio, Inc., (Duke Energy) will take the oral deposition of Karen Dabdoub (Ms. Dabdoub) and all witnesses whom Ms. Dabdoub intends to rely upon at hearing and any persons on whom Ms. Dabdoub relied upon in forming her opinion in the above captioned matter, on March 2, 2018 beginning at 10 A.M. and continuing day-to-day thereafter until complete.

The depositions will take place at the Symmes Township Safety Center, 8871 Weekly Lane, Cincinnati, OH 45249. The depositions will be taken upon oral examination (as if on cross-examination) before an officer authorized by law to take depositions.

Pursuant to Ohio Admin. Code 4901-1-21(E) and 4901-1-20, all witnesses are requested to produce at the time of their deposition true and accurate copies of the documents identified in Exhibit A.

Parties are invited to attend and to cross-examine.

Respectfully submitted,

/s/ Elizabeth H. Watts

Rocco O. D'Ascenzo (0077651)

Deputy General Counsel

Elizabeth H. Watts (0031092)

Associate General Counsel

DUKE ENERGY OHIO, INC.

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[bmcmahon@emclawyers.com](mailto:bmcmahon@emclawyers.com)

Attorneys for Duke Energy Ohio, Inc.

## **EXHIBIT A**

Duke Energy Ohio hereby requests that, at the time and place set forth above in the notice of deposition, *duces tecum*, each deponent produce true and accurate copies of the following documents:

1. Any and all documents that were reviewed by said deponent for purposes of preparing direct testimony relative to the above-captioned proceeding.
2. Any and all documents created or authored by said deponent for purposes of preparing direct testimony relative to the above-captioned proceeding.
3. Any and all documents referenced in the witness's direct testimony relative to the above-captioned proceeding.
4. Any and all documents reviewed by said deponent in preparing, or otherwise assisting in the preparation of, discovery responses submitted by Ms. Dabdoub relative to the above-captioned proceeding.
5. Any and all documents prepared by said deponent for purposes of preparing, or otherwise assisting in the preparation of, discovery responses submitted by Ms. Dabdoub relative to the above-captioned proceeding.

## **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a copy of the foregoing was served on the following parties of record by electronic service, this 27<sup>th</sup> day of February, 2018.

/s/ Elizabeth H. Watts  
Elizabeth H. Watts

<p>Kimberly W. Bojko Stephen E. Dutton Brian W. Dressel Carpenter Lipps &amp; Leland LLP 280 Plaza, Suite 1300 280 North High Street Columbus, OH 43215 <a href="mailto:bojko@carpenterlipps.com">bojko@carpenterlipps.com</a> <a href="mailto:Dutton@carpenterlipps.com">Dutton@carpenterlipps.com</a> <a href="mailto:dressel@carpenterlipps.com">dressel@carpenterlipps.com</a></p> <p><b>Counsel for Complainants</b></p>	<p>Terry L. Etter Assistant Consumers' Counsel Office of the Ohio Consumers' Counsel 65 East State Street, 7<sup>th</sup> Floor Columbus, Ohio 43215-4313 <a href="mailto:terry.etter@occ.ohio.gov">terry.etter@occ.ohio.gov</a></p> <p><b>Counsel for Office of the Ohio Consumers' Counsel</b></p>
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**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of Citizens	)	
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Complainants,	)	
v.	)	Case No. 17-2344-EL-CSS
	)	
Duke Energy Ohio, Inc.,	)	
	)	
Respondent.	)	

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**AMENDED NOTICE OF DUKE ENERGY OHIO, INC.,  
TO TAKE DEPOSITION *DUCES TECUM* OF  
MARK THOMPSON**

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Pursuant to Ohio Admin. Code Rule 4901-1-21(B), please take notice that Duke Energy Ohio, Inc., (Duke Energy) will take the oral deposition of Mark Thompson (Mr. Thompson) and all witnesses whom Mr. Thompson intends to rely upon at hearing and any persons on whom Mr. Thompson relied upon in forming his opinion in the above captioned matter, on March 2, 2018 beginning at 12 P.M. and continuing day-to-day thereafter until complete.

The depositions will take place at the Symmes Township Safety Center, 8871 Weekly Lane, Cincinnati, OH 45249. The depositions will be taken upon oral examination (as if on cross-examination) before an officer authorized by law to take depositions.

Pursuant to Ohio Admin. Code 4901-1-21(E) and 4901-1-20, all witnesses are requested to produce at the time of their deposition true and accurate copies of the documents identified in Exhibit A.

Parties are invited to attend and to cross-examine.

Respectfully submitted,

/s/ Elizabeth H. Watts

Rocco O. D'Ascenzo (0077651)

Deputy General Counsel

Elizabeth H. Watts (0031092)

Associate General Counsel

DUKE ENERGY OHIO, INC.

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Attorneys for Duke Energy Ohio, Inc.

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3. Any and all documents referenced in the witness's direct testimony relative to the above-captioned proceeding.
4. Any and all documents reviewed by said deponent in preparing, or otherwise assisting in the preparation of, discovery responses submitted by Mr. Thompson relative to the above-captioned proceeding.
5. Any and all documents prepared by said deponent for purposes of preparing, or otherwise assisting in the preparation of, discovery responses submitted by Mr. Thompson relative to the above-captioned proceeding.



## **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a copy of the foregoing was served on the following parties of record by electronic service, this 27<sup>th</sup> day of February, 2018.

/s/ Elizabeth H. Watts

Elizabeth H. Watts

<p>Kimberly W. Bojko Stephen E. Dutton Brian W. Dressel Carpenter Lipps &amp; Leland LLP 280 Plaza, Suite 1300 280 North High Street Columbus, OH 43215 <a href="mailto:bojko@carpenterlipps.com">bojko@carpenterlipps.com</a> <a href="mailto:Dutton@carpenterlipps.com">Dutton@carpenterlipps.com</a> <a href="mailto:dressel@carpenterlipps.com">dressel@carpenterlipps.com</a></p> <p><b>Counsel for Complainants</b></p>	<p>Terry L. Etter Assistant Consumers' Counsel Office of the Ohio Consumers' Counsel 65 East State Street, 7<sup>th</sup> Floor Columbus, Ohio 43215-4313 <a href="mailto:terry.etter@occ.ohio.gov">terry.etter@occ.ohio.gov</a></p> <p><b>Counsel for Office of the Ohio Consumers' Counsel</b></p>
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**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of Citizens	)	
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Complainants,	)	
v.	)	Case No. 17-2344-EL-CSS
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Duke Energy Ohio, Inc.,	)	
	)	
Respondent.	)	

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**AMENDED NOTICE OF DUKE ENERGY OHIO, INC.,  
TO TAKE DEPOSITION *DUCES TECUM* OF  
MARC WAHLQUIST**

---

Pursuant to Ohio Admin. Code Rule 4901-1-21(B), please take notice that Duke Energy Ohio, Inc., (Duke Energy) will take the oral deposition of Marc Wahlquist (Mr. Wahlquist) and all witnesses whom Mr. Wahlquist intends to rely upon at hearing and any persons on whom Mr. Wahlquist relied upon in forming his opinion in the above captioned matter, on March 2, 2018 beginning at 4 P.M. and continuing day-to-day thereafter until complete.

The depositions will take place at the Symmes Township Safety Center, 8871 Weekly Lane, Cincinnati, OH 45249. The depositions will be taken upon oral examination (as if on cross-examination) before an officer authorized by law to take depositions.

Pursuant to Ohio Admin. Code 4901-1-21(E) and 4901-1-20, all witnesses are requested to produce at the time of their deposition true and accurate copies of the documents identified in Exhibit A.

Parties are invited to attend and to cross-examine.

Respectfully submitted,

/s/ Elizabeth H. Watts

Rocco O. D'Ascenzo (0077651)

Deputy General Counsel

Elizabeth H. Watts (0031092)

Associate General Counsel

DUKE ENERGY OHIO, INC.

139 East Fourth Street

1303-Main

P.O. Box 960

Cincinnati, Ohio 45202

Telephone: (513) 287-4320

[Rocco.D'Ascenzo@duke-energy.com](mailto:Rocco.D'Ascenzo@duke-energy.com)

[Elizabeth.Watts@duke-energy.com](mailto:Elizabeth.Watts@duke-energy.com)

Robert A. McMahon (0064319)

Eberly McMahon Copetas LLC

2321 Kemper Lane, Suite 100

Cincinnati, Ohio 45206

(513) 533-3441 (telephone)

(513) 533-3554 (fax)

[bmcmahon@emclawyers.com](mailto:bmcmahon@emclawyers.com)

Attorneys for Duke Energy Ohio, Inc.

## **EXHIBIT A**

Duke Energy Ohio hereby requests that, at the time and place set forth above in the notice of deposition, *duces tecum*, each deponent produce true and accurate copies of the following documents:

1. Any and all documents that were reviewed by said deponent for purposes of preparing direct testimony relative to the above-captioned proceeding.
2. Any and all documents created or authored by said deponent for purposes of preparing direct testimony relative to the above-captioned proceeding.
3. Any and all documents referenced in the witness's direct testimony relative to the above-captioned proceeding.
4. Any and all documents reviewed by said deponent in preparing, or otherwise assisting in the preparation of, discovery responses submitted by Mr. Wahlquist relative to the above-captioned proceeding.
5. Any and all documents prepared by said deponent for purposes of preparing, or otherwise assisting in the preparation of, discovery responses submitted by Mr. Wahlquist relative to the above-captioned proceeding.

## **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a copy of the foregoing was served on the following parties of record by electronic service, this 27<sup>th</sup> day of February, 2018.

/s/ Elizabeth H. Watts

Elizabeth H. Watts

<p>Kimberly W. Bojko Stephen E. Dutton Brian W. Dressel Carpenter Lipps &amp; Leland LLP 280 Plaza, Suite 1300 280 North High Street Columbus, OH 43215 <a href="mailto:bojko@carpenterlipps.com">bojko@carpenterlipps.com</a> <a href="mailto:Dutton@carpenterlipps.com">Dutton@carpenterlipps.com</a> <a href="mailto:dressel@carpenterlipps.com">dressel@carpenterlipps.com</a></p> <p><b>Counsel for Complainants</b></p>	<p>Terry L. Etter Assistant Consumers' Counsel Office of the Ohio Consumers' Counsel 65 East State Street, 7<sup>th</sup> Floor Columbus, Ohio 43215-4313 <a href="mailto:terry.etter@occ.ohio.gov">terry.etter@occ.ohio.gov</a></p> <p><b>Counsel for Office of the Ohio Consumers' Counsel</b></p>
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