**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| In the Matter of the Application of Bolt Energy, LLC for Certification as an Aggregator, Power Broker and Power Marketer. | )  )  )  ) | Case No. 19-1562-EL-CRS |

**NOTICE TO TAKE DEPOSITIONS**

**AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

**BY**

**THE Office of the Ohio Consumers’ Counsel**

To protect Ohio utility customers, in accordance with Ohio Adm. Code Section 4901-1-21(B), please take notice that the Office of the Ohio Consumers’ Counsel (“OCC”) will take the deposition upon oral examination of the following individuals:

1. Person(s) employed by Bolt Energy, LLC (“Bolt”) with knowledge and expertise regarding:
   1. The Initial Certification Application for Retail Generation Providers and Power Marketers filed by Bolt in this proceeding on August 8, 2019;
   2. The relationship of Bolt’s principal Officers, Directors, Partners, and/or Members with Smart One Energy, LLC, which is or was certificated to supply natural gas or electric supply services in the states of Maryland, New York, and/or Michigan; and
   3. Liabilities and state utility regulatory investigations that could adversely impact Bolt’s financial or operational status or ability to provide services to customers in Ohio.
2. All person(s) responsible for answering OCC’s interrogatories and/or responding to requests for production of documents (including responses that state that no documents are responsive to a request to produce).
3. All person(s) who will be called by Bolt to present testimony, including direct, rebuttal, surrebuttal, and any other form of testimony filed, or to be filed, in these proceedings.
4. Elie Klein, President of Bolt Energy, LLC
5. Morris Klein, Member of Bolt Energy, LLC

The deposition will be conducted at OCC’s offices, 65 East State Street, 7th Floor, Columbus, Ohio, 43215, starting on September 3, at 10:00 a.m., or at another time and date agreed upon by OCC and Bolt, and will continue from day to day, except for holidays and weekends, until completed. The deponent(s) will appear at the designated time and date with all requested documents (identified below) and will remain present until deposed. Deponents will be deposed one after another.

The deposition will be taken of the aforementioned deponent(s) on relevant topics within the scope of this proceeding, including but not limited to, each deponent’s knowledge and expertise with the subject matter of these proceedings. 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, OCC requests that each deponent produce, at least one day prior to the taking of his/her deposition, the following documents:

1. A copy of all documents each deponent used in answering OCC discovery and/or PUCO Staff data requests;
2. A copy of all documents upon which each deponent bases his/her knowledge of the Initial Certification Application for Retail Generation Providers and Power Marketers filed by Bolt in this proceeding on August 8, 2019;
3. A copy of all documents upon which each deponent bases his/her knowledge of the relationship of Bolt’s principal Officers, Directors, Partners, and/or Members with Smart One Energy, LLC, which is or was certificated to supply natural gas or electric supply services in the states of Maryland, New York, and/or Michigan; and
4. A copy of all documents upon which each deponent bases his/her knowledge of any liabilities and state utility regulatory investigations that could adversely impact Bolt’s financial or operational status or ability to provide services to customers in Ohio.

Respectfully submitted,

Bruce Weston (0016973)

Ohio Consumers’ Counsel

/s/ *Angela O’Brien*

Angela O’Brien (0097579)

Counsel of Record

Ambrosia Logsdon (0096598)

Assistant Consumers’ Counsel

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(willing to accept service by e-mail)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Notice to Take Deposition and Requests for Production of Documents was served on the persons stated below via electronic transmission this 27th day of August 2019.

*/s/ Angela O’Brien*

Angela O’Brien

Assistant Consumers’ Counsel

**SERVICE LIST**

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