**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| In the Matter of the Application of Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company for Approval of their Energy Efficiency and Peak Demand Reduction Program Portfolio Plans for 2017 through 2019. | )  )  )  )  )  )  ) | Case No. 16-743-EL-POR |

**NOTICE TO TAKE DEPOSITION**

**AND REQUEST FOR PRODUCTION OF DOCUMENTS**

**BY**

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

Under 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 Edward C. Miller. OCC seeks to conduct the deposition of this individual upon oral examination on January 19, 2017 at or around 1:00 pm eastern time at a location that is mutually agreeable to the parties. The deposition will continue, from day to day, except for holidays and weekends, until completed. The deponent will appear at the agreed upon place at the designated time and date with all requested documents (identified below) and remain present until deposed.

The deposition will be taken of the aforementioned deponent on relevant topics within the scope of these proceedings, including but not limited to, the subject matter of the deponent’s testimony and the 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.

Under Ohio Adm. Code Rules 4901-1-21(E) and 4901-1-20, the deponent is requested to produce, at least 24 hours prior to his deposition, all documents relating to his responsibilities with respect to Case No. 16-743-EL-POR and responses to discovery that were authored by the deponent or were provided to OCC with input from the deponent. Additionally, the deponent shall produce documents including, but not limited to, the results of any studies done for these proceedings and any backup documents, including raw data for such studies, any documents relied upon or cited in the pre-filed testimony, and any workpapers that support the pre-filed testimony.

Respectfully submitted,

BRUCE WESTON (0016973)

OHIO CONSUMERS' COUNSEL

*/s/ Christopher Healey*

Christopher Healey (0086027)  
Counsel of Record

Assistant Consumers' Counsel

**Office of the Ohio Consumers' Counsel**

10 West Broad Street, Suite 1800

Columbus, Ohio 43215-3485

Telephone: (614) 466-9571 (Healey direct)

[christopher.healey@occ.ohio.gov](mailto:christopher.healey@occ.ohio.gov)

(will accept email service)

Dane Stinson (0019101)

Bricker & Eckler LLP

100 South Third Street

Columbus, Ohio 43215

Telephone: (614) 227-4854

[dstinson@bricker.com](mailto:dstinson@bricker.com)

(will accept email service)

Outside Counsel for the Office of the Ohio Consumers’ Counsel

**CERTIFICATE OF SERVICE**

It is hereby certified that a true copy of the foregoing Notice to Take Deposition and Request for Production of Documentswas served by electronic transmission upon the parties below this 10th day of January, 2017.

*/s/ Christopher Healey*

Christopher Healey

Assistant Consumers’ Counsel

**SERVICE LIST**

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