**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

|  |  |  |
| --- | --- | --- |
| In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant R.C. 4928.143 in the Form of an Electric Security Plan. | )  )  )  )  )  )  ) | Case No. 14-1297-EL-SSO |

**NOTICE TO TAKE DEPOSITION**

**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, January 7, 2016, commencing at 10:00 a.m.

OCC seeks to conduct the deposition of Mr. Bresler upon oral examination at OCC’s office, 10 W. Broad St., 18th Floor, Columbus, Ohio, at 10:00 a.m. beginning on Thursday, January 7, 2016. This deposition will continue, from day to day, except for holidays and weekends, until completed. Mr. Bressler will appear at the OCC's office 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, Mr. Bresler's testimony filed on December 30, 2015 in this proceeding, FirstEnergy Utilities' proposal to enter into an affiliate power purchase agreement for inclusion in the power purchase agreement rider, the Third Supplemental Stipulation and Recommendation filed on December 1, 2015 in this case, and FirstEnergy Utilities' Application filed on August 4, 2014. 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, F. Stuart Bresler, III is requested to produce two hours prior to his deposition, all documents relied upon or referred to when drafting his pre-filed testimony in this proceeding. 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, and workpapers.

Respectfully submitted,

BRUCE J. WESTON (0016973)

OHIO CONSUMERS’ COUNSEL

*/s/ Maureen R. Willis*

Larry S. Sauer, (0039223),

Counsel of Record

Maureen R. Willis (0020847)

William J. Michael (0070921)

Kevin F. Moore (0089228)

Ajay Kumar (0092208)

Assistant Consumers’ Counsel

**Office of the Ohio Consumers’ Counsel**

10 West Broad Street, Suite 1800

Columbus, Ohio 43215-3485

Telephone [Sauer]: (614) 466-1312

Telephone [Willis]: (614) 466-9567

Telephone [Michael]: (614) 466-1291

Telephone [Moore]: (614) 387-2965

Telephone [Kumar]: (614) 466-1292

[larry.sauer@occ.ohio.gov](mailto:larry.sauer@occ.ohio.gov)

[maureen.willis@occ.ohio.gov](mailto:maureen.willis@occ.ohio.gov)

[William.michael@occ.ohio.gov](mailto:William.michael@occ.ohio.gov)

[Kevin.moore@occ.ohio.gov](mailto:Kevin.moore@occ.ohio.gov)

[Ajay.kumar@occ.ohio.gov](mailto:Ajay.kumar@occ.ohio.gov)

(All Attorneys Will Accept Service Via Email)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Notice to Take Deposition and Requests for Production of Documents was served via electronic service upon the parties this 31st day of December, 2015.

*/s/ Maureen R. Willis*\_\_\_\_\_\_\_\_\_\_\_

Maureen R. Willis

Assistant Consumers’ Counsel

**SERVICE LIST**

|  |  |
| --- | --- |
| [Thomas.mcnamee@puc.state.oh.us](mailto:Thomas.mcnamee@puc.state.oh.us)  [Thomas.lindgren@puc.state.oh.us](mailto:Thomas.lindgren@puc.state.oh.us)  [Steven.beeler@puc.state.oh.us](mailto:Steven.beeler@puc.state.oh.us)  [mkurtz@BKLlawfirm.com](mailto:mkurtz@BKLlawfirm.com)  [kboehm@BKLlawfirm.com](mailto:kboem@BKLlawfirm.com)  [jkylercohn@BKLlawfirm.com](mailto:jkylercohn@BKLlawfirm.com)  [stnourse@aep.com](mailto:stnourse@aep.com)  [mjsatterwhite@aep.com](mailto:mjsatterwhite@aep.com)  [yalami@aep.com](mailto:yalami@aep.com)  [Jennifer.spinosi@directenergy.com](mailto:Jennifer.spinosi@directenergy.com)  [ghull@eckertseamans.com](mailto:ghull@eckertseamans.com)  [myurick@taftlaw.com](mailto:myurick@taftlaw.com)  [dparram@taftlaw.com](mailto:dparram@taftlaw.com)  [Schmidt@sppgrp.com](mailto:Schmidt@sppgrp.com)  [ricks@ohanet.org](mailto:ricks@ohanet.org)  [tobrien@bricker.com](mailto:tobrien@bricker.com)  [mkl@smxblaw.com](mailto:mkl@smxblaw.com)  [gas@smxblaw.com](mailto:gas@bbrslaw.com)  [wttpmlc@aol.com](mailto:wttpmlc@aol.com)  [lhawrot@spilmanlaw.com](mailto:lhawrot@spilmanlaw.com)  [dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)  [blanghenry@city.cleveland.oh.us](mailto:blanghenry@city.cleveland.oh.us)  [hmadorsky@city.cleveland.oh.us](mailto:hmadorsky@city.cleveland.oh.us)  [kryan@city.cleveland.oh.us](mailto:kryan@city.cleveland.oh.us)  [mdortch@kravitzllc.com](mailto:mdortch@kravitzllc.com)  [rparsons@kravitzllc.com](mailto:rparsons@kravitzllc.com)  [gkrassen@bricker.com](mailto:gkrassen@bricker.com)  [dstinson@bricker.com](mailto:dstinson@bricker.com)  [dborchers@bricker.com](mailto:dborchers@bricker.com)  [DFolk@akronohio.gov](mailto:DFolk@akronohio.gov)  [mkimbrough@keglerbrown.com](mailto:mkimbrough@keglerbrown.com)  [sechler@carpenterlipps.com](mailto:sechler@carpenterlipps.com)  [gpoulos@enernoc.com](mailto:gpoulos@enernoc.com)  [toddm@wamenergylaw.com](mailto:toddm@wamenergylaw.com)  [dwolff@crowell.com](mailto:dwolff@crowell.com)  [rlehfeldt@crowell.com](mailto:rlehfeldt@crowell.com)  [rkelter@elpc.org](mailto:rkelter@elpc.org)  Attorney Examiners:  [Gregory.price@puc.state.oh.us](mailto:Gregory.price@puc.state.oh.us)  [Mandy.willey@puc.state.oh.us](mailto:Mandy.willey@puc.state.oh.us)  [Megan.addison@puc.state.oh.us](mailto:Megan.addison@puc.state.oh.us) | [burkj@firstenergycorp.com](mailto:burkj@firstenergycorp.com)  [cdunn@firstenergycorp.com](mailto:cdunn@firstenergycorp.com)  [jlang@calfee.com](mailto:jlang@calfee.com)  [talexander@calfee.com](mailto:talexander@calfee.com)  [dakutik@jonesday.com](mailto:dakutik@jonesday.com)  [sam@mwncmh.com](mailto:sam@mwncmh.com)  [fdarr@mwncmh.com](mailto:fdarr@mwncmh.com)  [mpritchard@mwncmh.com](mailto:mpritchard@mwncmh.com)  [cmooney@ohiopartners.org](mailto:cmooney@ohiopartners.org)  [callwein@wamenergylaw.com](mailto:callwein@wamenergylaw.com)  [joliker@igsenergy.com](mailto:joliker@igsenergy.com)  [mswhite@igsenergy.com](mailto:mswhite@igsenergy.com)  [Bojko@carpenterlipps.com](mailto:Bojko@carpenterlipps.com)  [ghiloni@carpenterlipps.com](mailto:ghiloni@carpenterlipps.com)  [barthroyer@aol.com](mailto:barthroyer@aol.com)  [athompson@taftlaw.com](mailto:athompson@taftlaw.com)  [Christopher.miller@icemiller.com](mailto:Christopher.miller@icemiller.com)  [Gregory.dunn@icemiller.com](mailto:Gregory.dunn@icemiller.com)  [Jeremy.grayem@icemiller.com](mailto:Jeremy.grayem@icemiller.com)  [blanghenry@city.cleveland.oh.us](mailto:blanghenry@city.cleveland.oh.us)  [hmadorsky@city.cleveland.oh.us](mailto:hmadorsky@city.cleveland.oh.us)  [kryan@city.cleveland.oh.us](mailto:kryan@city.cleveland.oh.us)  [tdougherty@theOEC.org](mailto:tdougherty@theOEC.org)  [jfinnigan@edf.org](mailto:jfinnigan@edf.org)  [Marilyn@wflawfirm.com](mailto:Marilyn@wflawfirm.com)  [todonnell@dickinsonwright.com](mailto:todonnell@dickinsonwright.com)  [matt@matthewcoxlaw.com](mailto:matt@matthewcoxlaw.com)  [mfleisher@elpc.org](mailto:mfleisher@elpc.org)  [drinebolt@ohiopartners.org](mailto:drinebolt@ohiopartners.org)  [meissnerjoseph@yahoo.com](mailto:meissnerjoseph@yahoo.com)  [LeslieKovacik@toledo.oh.gov](mailto:LeslieKovacik@toledo.oh.gov)  [trhayslaw@gmail.com](mailto:trhayslaw@gmail.com)  [Jeffrey.mayes@monitoringanalytics.com](mailto:Jeffrey.mayes@monitoringanalytics.com)  [mhpetricoff@vorys.com](mailto:mhpetricoff@vorys.com)  [mjsettineri@vorys.com](mailto:mjsettineri@vorys.com)  [glpetrucci@vorys.com](mailto:glpetrucci@vorys.com)  [msoules@earthjustice.org](mailto:msoules@earthjustice.org)  [sfisk@earthjustice.org](mailto:sfisk@earthjustice.org) |