

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Regulation of the)	
Purchased Gas Adjustment Clauses)	
Contained Within the Rate Schedules of)	Case No. 12-209-GA-GCR
Northeast Natural Gas Company and)	
Related Matters.)	

In the Matter of the Regulation of the)	
Purchased Gas Adjustment Clauses)	
Contained Within the Rate Schedules of)	Case No. 12-212-GA-GCR
the Orwell Natural Gas Company and)	
Related Matters.)	

**NOTICE TO TAKE DEPOSITION UPON ORAL EXAMINATION OF
MARTIN K. WHELAN
AND REQUEST 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 Ohio Consumers' Counsel ("OCC") will take the oral deposition of all individuals for whom testimony is filed or will be filed in the above-captioned matters or who have knowledge and expertise with the subject matter of these proceedings on behalf of the Northeast Natural Gas Company ("Northeast") and Orwell Natural Gas Company ("Orwell") (together "the Companies") including, but not limited to, Martin K. Whelan. The deposition will take place at the offices of OCC, 10 West Broad Street, 18th Floor, Columbus, Ohio and will begin at 1:00 p.m. on Thursday June 27, 2013, or such other place and time as are mutually agreed upon by the Companies and the OCC. Deponent will appear at designated time, and remain present until deposed. Parties are invited to attend and cross-examine. In order to expedite the deposition, the Deponent shall deliver

the documents to OCC in advance of the deposition, no later than 1:00 p.m. on Wednesday, June 26, 2013 at the OCC's offices at 10 West Broad Street, 18th Floor, or such other place and time as are mutually agreed upon by the Companies and the OCC.

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 or the deponent's knowledge and expertise regarding Northeast and Orwell's natural gas supply agreements and natural gas procurement practices, Northeast and Orwell's natural gas purchasing policies and procedures, including but not limited to all affiliate transactions that arise there from such as natural gas processing for Northeast and Orwell that took place during the audit period at the Cobra Pipeline Company for processing and compression service, or any other related matter as raised by the Commission's Staff contained in the Financial Audit of the Gas Cost Recovery Mechanisms for the Effective GCR Periods July 1, 2010 through June 30, 2012 filed February 28, 2013 which is/are subject matter(s) of this proceeding. The deposition will be taken upon oral examination (as upon cross-examination) before an officer authorized by law to take depositions and will continue from day to day, except for holidays and weekends, until completed.

Pursuant to Ohio Adm. Code Rules 4901-1-21(E) and 4901-1-20, the deponent is requested to produce at the above mentioned time all documents relating to his testimony or the deponent's knowledge and expertise with the subject matter of these proceedings and/or the deponent's responses to discovery, including, but not limited to, the results of any studies done for these proceedings and any backup documentation, including raw data, for those studies. Finally, any and all invoices and payment records associated with

natural gas processing for Northeast and Orwell during the audit period at the Cobra Pipeline Company for processing and compression service.

Respectfully submitted,

BRUCE J. WESTON
OHIO CONSUMERS' COUNSEL

/s/ Joseph P. Serio

Joseph P. Serio, Counsel of Record
Assistant Consumers' Counsel

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the OCC's Notice to Take Deposition of Martin K. Whelan and Request for Production of Documents was served on the persons stated below electronic mail, this 25th day of June 2013.

/s/ Joseph P. Serio

Joseph P. Serio
Assistant Consumers' Counsel

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in

Case No(s). 12-0209-GA-GCR, 12-0212-GA-GCR

Summary: Notice of Deposition Notice to Take Deposition Upon Oral Examination of Martin K. Whelan and Request for Production of Documents by the Office of the Ohio Consumers' Counsel electronically filed by Patti Mallarnee on behalf of Serio, Joseph P.