

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke)	
Energy Ohio for Authority to Establish a)	Case No. 14-841-EL-SSO
Standard Service Offer Pursuant to)	
Section 4928.143, Revised Code, in the)	
Form of an Electric Security Plan,)	
Accounting Modifications and Tariffs for)	
Generation Service.)	

In the Matter of the Application of Duke)	
Energy Ohio for Authority to Amend its)	Case No. 14-842-EL-ATA
Certified Supplier Tariff, P.U.C.O.)	
No. 20.)	

**NOTICE TO TAKE DEPOSITIONS
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 the following individuals:

1. Charles Whitlock, Director and Member of Executive Committee of Ohio Valley Electric Corporation; President of Midwest Commercial Generation, Duke Energy Corporation
2. William Don Wathen Jr., Director of Rates and Regulatory Strategy, Duke Energy Business Services LLC.
3. Person(s) with knowledge and expertise regarding:
 - a. The Amended and Restated Inter-Company Power Agreement ("ICPA") between the Sponsoring Companies and OVEC including provisions under Section 9.18 of the ICPA providing for sale or transfer of a Sponsoring Companies' OVEC Interest.

- b. Requests for consent of a sale or transfer of a Sponsoring Company's interest in OVEC under Section 9.18 of the ICPA and any and all communications and/or actions taken by any Sponsoring Company regarding such requests for consent.
 - c. Estimates made by Duke Energy Ohio, Inc., or in its possession or control, regarding the economic value of its share of the capacity and energy from OVEC to its retail customers for the duration of Duke Energy Ohio's entitlement, including persons familiar with assumptions, calculations, and workpapers underlying such estimates.
 - d. Estimates made by Duke Energy Ohio, Inc., or in its possession or control, of the net cost or benefit to customers and projected rate impacts of the Price Stabilization Rider, including persons familiar with assumptions, calculations, and workpapers underlying such estimates.
- 4. All persons who will be called by Duke Energy Ohio, Inc. to present testimony, including direct, rebuttal, surrebuttal, and any other form of testimony filed, or to be filed in these proceedings.
 - 5. All persons responsible for answering OCC's interrogatories responding to requests for production of documents (including responses that state that no documents are responsive to a request to produce), and/or requests for admissions served in these proceedings upon Duke Energy Ohio, Inc.

OCC seeks to conduct the depositions upon oral examination of persons identified in paragraphs 1 through 3 at OCC's offices, 10 W. Broad St., 18th Floor, Columbus, Ohio, at 10:00 a.m. beginning on August 1, 2014, or such other time that is mutually agreed upon by the Parties. Persons identified in paragraphs 4 and 5, will be deposed at a

later date, to be determined following the conduct of the depositions scheduled for August 1, 2014. The depositions will continue, one-after-the-other, from day to day, except for holidays and weekends, until completed. Each deponent will appear at the OCC at the designated time and date with all requested documents (identified below) and remain present until deposed.

The depositions will be taken of the aforementioned deponents 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 depositions 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, each deponent is requested to produce, two hours prior to his/her deposition, all documents relating to his/her responsibilities with respect to Case Nos. 14-841-EL-SSO and 14-842-EL-ATA and responses to discovery that were authored by the deponent or were provided to OCC with input from the deponent. Additionally, each deponent shall bring 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 J. WESTON
OHIO CONSUMERS' COUNSEL

/s/ Maureen R. Grady

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice to Take Depositions and Requests for Production of Documents was served via electronic service upon the parties this 28th day of July, 2014.

/s/ Maureen R. Grady

Maureen R. Grady
Assistant Consumers' Counsel

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in

Case No(s). 14-0841-EL-SSO, 14-0842-EL-ATA

Summary: Notice of Deposition Notice to Take Depositions and Requests for Production of Documents by the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Grady, Maureen R. Ms.