

In the Matter of the Application of)
Columbus Southern Power Company and) Case No. 05-376-EL-UNC
Ohio Power Company for Authority to)
Recover Costs Associated with the)
Ultimate Construction and Operation of an)
Integrated Gasification Combined Cycle)
Electric Generation Facility.)

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. Andrea E. Moore, Director of Regulatory Services, Ohio Power Company
2. Heather M. Whitney, Senior Audit Consultant, American Electric Power Service Corporation
3. Daniel M. Duellman, Director of New Generation Engineering, American Electric Power Service Corporation
4. Gary O. Spitznogle, Vice President of Regulatory and Finance, Ohio Power Company dba AEP Ohio
5. Philp J. Nelson, Director of Financial Planning, American Electric Power Service Corporation
6. Bruce H. Braine, Vice President of Strategic Policy Analysis, American Electric Power Service Corporation
7. Michael J. Mudd, Program Manager of Technology and Development, American Electric Power Service Corporation
8. Person(s) with knowledge and expertise regarding:

- a. The amount of generation that Ohio Power needs to meet its “provider of last resort” obligations under R.C. 4928.14.
 - b. Evaluations and/or cost analysis of securing power for purposes of meeting Ohio Power’s “provider of last resort” obligations under R.C. 4928.14
 - c. The portion of Great Bend IGCC generation facility Phase I costs that were attributed to Ohio Power’s “provider of last resort” obligations under R.C. 4928.14.
 - d. American Electric Power Service Corporation’s “White Paper” analysis of the Great Bend IGCC generating facility
 - e. PUCO Staff’s review of project expenditures
 - f. Communications between persons representing Ohio Power Company (or its predecessors, CSP and OP) and the PUCO (including but not limited to, Commissioners, Attorney Examiners, Legal Director, Chief of Staff, or any other employees of the PUCO) that occurred after the Ohio Supreme Court remanded the case back to the PUCO on December 22, 2011.
9. All persons who will be called by Ohio Power Company to present testimony, including rebuttal, surrebuttal, and any other form of testimony filed, or to be filed in these proceedings.
 10. All persons responsible for answering intervening parties’ 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 Ohio Power Company as well as data requests from the PUCO Staff.

OCC seeks to conduct the depositions upon oral examination of persons identified in paragraphs 1 through 4 at OCC’s offices, 10 W. Broad St., 18th Floor, Columbus,

Ohio, at 10:00 a.m. beginning on November 21, 2014, or such other time that is mutually agreed upon by the Parties. Persons identified in paragraphs 5 through 10, will be deposed at a later date, to be determined following the conduct of the depositions scheduled for November 21, 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, one (1) business day prior to his/her deposition, all documents relating to his/her responsibilities with respect to Case No. 05-376-EL-UNC 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, any workpapers that support the pre-filed testimony, and any communications with the PUCO (including the PUCO Staff) upon which any Ohio Power witness relied.

Respectfully submitted,

BRUCE J. WESTON
OHIO CONSUMERS' COUNSEL

/s/ Maureen 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 14th day of November, 2014.

/s/ Maureen R. Grady
Maureen R. Grady
Assistant Consumers' Counsel

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Case No(s). 05-0376-EL-UNC

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.