

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)
Edison Company, The Cleveland Electric) Case No. 14-1297-EL-SSO
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.

**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 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 Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company including, but not limited to, the following individuals:

1. Jason Lisowski, Assistant Controller – FES/FEG, FirstEnergy Solutions Corp.
2. Judah L. Rose, Managing Director, ICF International.
3. All persons who will be called by Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company ("Company") to present testimony, including direct, rebuttal, surrebuttal, and any other form of testimony filed, or to be filed in these proceedings.
4. All persons responsible for answering OCC's interrogatories and/or responding to requests for production of documents (including responses that state that no documents are responsive to a request to produce) served in these proceedings upon the Company.

OCC seeks to conduct the deposition of Judah L. Rose upon oral examination at OCC's offices, 10 W. Broad St., 18th Floor, Columbus, Ohio, at 1:00 p.m. beginning on December 9, 2014, or such other time or place that is mutually agreed upon by the Parties. The deposition of Jason Lisowski shall follow at 9:00 a.m. on December 10, 2014 at OCC's offices, 10 W. Broad St., 18th Floor, Columbus, Ohio, or such other time or place that is mutually agreed upon by the Parties. These two depositions will continue, 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. 14-1297-EL-SSO and responses to discovery that were authored by the deponent or were provided to OCC with input from the deponent. Additionally, the 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/ Larry Sauer

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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 2nd day of December 2014.

/s/ Larry Sauer

Larry Sauer
Assistant Consumers' Counsel

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/2/2014 5:01:21 PM

in

Case No(s). 14-1297-EL-SSO

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 Sauer, Larry S.