

**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 SIERRA CLUB**

Pursuant to Ohio Adm. Code Rule 4901-1-21(B), please take notice that the Sierra Club will take the oral deposition of the following individuals, for whom testimony is filed or will be filed in the above-captioned matter or who have knowledge and expertise relating to the subject matter of these proceedings on behalf of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company:

1. Jason Lisowski, Assistant Controller – FES/FEG, FirstEnergy Service Company.
2. Judah L. Rose, Managing Director, ICF International.
3. Jay A. Ruberto, Director, Regulated Generation and Dispatch, FirstEnergy Service Company.
4. Marlene Barwood, Assistant Controller, FEU, FirstEnergy Service Company.
5. Donald A. Moul, Vice President of Commodity Operations, FirstEnergy Solutions Corp.
6. Eileen M. Mikkelsen, Director of Rates and Regulatory Affairs for FirstEnergy Corp., FirstEnergy Service Company.

7. Sarah Murley, Principal, Applied Economics LLC.
8. Paul A. Harden, Senior Vice President, Fleet Engineering, FirstEnergy Nuclear Operating Company.
9. Michael Thorn, Manager, Agreements Support, FirstEnergy Service Company.
10. Amy Morrow, Analyst, Financial Reporting & Technical Accounting, FirstEnergy Service Company.
11. Tracy Ashton, Manager, Reporting Strategy & Process Management, FirstEnergy Service Company (formerly Manager, Financial Reporting & Technical Accounting, FirstEnergy Service Company).
12. Joanne M. Savage, Analyst, FirstEnergy Service Company.
13. Richard Ziegler, Director, FERC & RTO Technical Support, FirstEnergy Service Company.
14. Santino L. Fanelli, Manager, Revenue Requirements, FirstEnergy Service Company.
15. Steven E. Strah, Vice President, Distribution Support, FirstEnergy Service Company.
16. The person or persons who ran the dispatch model on behalf of the EDU Team. *See* FirstEnergy's Resp. to SC-INT-55.

Sierra Club seeks to conduct the deposition of Jason Lisowski upon oral examination at FirstEnergy Corporation's ("FirstEnergy") offices, 76 South Main Street, Akron, Ohio, at 8:00 a.m. beginning on December 19, 2014. Sierra Club seeks to conduct the deposition by oral examination of the persons named below at the times listed, with the depositions to be conducted at FirstEnergy's offices, 76 South Main Street, Akron, Ohio, or at such other time or place that is mutually agreed upon by the Parties:

- Judah L. Rose, 9:00 a.m., January 7, 2015;
- Jay A. Ruberto, 9:00 a.m., January 8, 2015;
- Marlene Barwood 9:00 a.m., on January 8, 2015;

- Steven E. Strah, 9:00 a.m., January 9, 2015;
- Eileen M. Mikkelsen, 9:00 a.m., January 9, 2015;
- Paul A. Harden, 9:00 a.m., January 12, 2015;
- The person or persons who ran the dispatch model on behalf of the EDU Team., 9:00 a.m., January 12, 2015;
- Michael Thorn, 9:00 a.m., January 13, 2015;
- Amy Morrow, 9:00 a.m., January 13, 2015;
- Tracy Ashton, 9:00 a.m., January 13, 2015;
- Sarah Murley, 9:00 a.m., January 14, 2015;
- Joanne M. Savage, 9:00 a.m., January 14, 2015;
- Richard Ziegler, 9:00 a.m., January 14, 2015;
- Santino L. Fanelli, 9:00 a.m., January 15, 2015;
- Donald A. Moul, 9:00 a.m., January 15, 2015.

Each deposition will continue, from day to day, except for holidays and weekends, until completed. Each deponent will appear at the offices of FirstEnergy at the designated time and date with all requested documents (identified below) and remain present until deposed.

The depositions of the deponents listed above will be taken on relevant topics within the scope of these proceedings, including but not limited to, the deponent's knowledge and/or expertise concerning the subject matter of these proceedings, and, for those deponents who have testified in this matter, the subject matter of the deponent's testimony.

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 No. 14-1297-EL-SSO and responses to discovery that were authored by the deponent or were provided to Sierra Club 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 work papers that support the pre-filed testimony.

Respectfully submitted,

/s/ Christopher J. Allwein

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Attorneys for Sierra Club

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 15th day of December 2014.

/s/ Christopher J. Allwein
Christopher J. Allwein

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

Summary: Notice of Deposition of Jason Lisowski. et al, electronically filed by Mr. Christopher J. Allwein on behalf of SIERRA CLUB