

**BEFORE  
THE OHIO POWER SITING BOARD**

In the Matter of the Application of NRG Ohio Pipeline    )  
Company LLC for Approval of a Letter of            )  
Notification for the Avon Lake Gas Addition Project   )  
in Lorain County, Ohio                                        )  
Case No. 14-1717-GA-BLN

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**NOTICE OF DEPOSITION DUCES TECUM BY  
NRG OHIO PIPELINE COMPANY LLC**

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Please take notice that pursuant to Ohio Administrative Code Rule 4906-7-07(E), NRG Ohio Pipeline Company LLC (“NRG Ohio Pipeline”) will take the oral deposition of the following Lorain County Property Owners (“Property Owners”) witnesses:

- All persons to be called by the Property Owners to present testimony, including direct, rebuttal, surrebuttal and any other form of testimony filed, or to be filed in this proceeding.

All persons to be called by the Property Owners to bring with them all documents relied upon in preparation of their testimony. The term “document” refers to any written, printed, typed, photostatic, photographed, recorded, electronically stored, computerized and/or otherwise reproduced communication or representation, whether comprised of letters, words, numbers, pictures, sounds or symbols, electronic and/or computerized data or any combination thereof. This definition includes all drafts of every document and/or computer file, and copies or duplicates of documents and/or computer files contemporaneously or subsequently created which have any non-conforming notes or other markings. More specifically, the term "document" includes, but is not limited to, correspondence, memoranda, notes or notations, records, letters, e-

mail, envelopes, telegrams, messages, studies, analyses, contracts, agreements, working papers, accounts, analytical records, reports and/or summaries of investigations, trade letters, press releases, comparisons, books, calendars, diaries, articles, magazines, newspapers, booklets, brochures, pamphlets, circulars, bulletins, notices, drawings, diagrams, instructions, notes or minutes of meetings or of other communications of any type, including inter- and intra-office communications, questionnaires, surveys, charts, graphs, photographs, phonograph recordings, films, tapes, disks, data cells, e-mail, printouts or hard copies of information stored or maintained by electronic data processing or word processing equipment, all other data compilations from which information can be obtained (by translation, if necessary, by you through detection devices into usable form) including, without limitation, electromagnetically sensitive storage media such as floppy disks, hard disks and/or CD-ROM, and any preliminary versions, drafts or revisions of any of the foregoing.

The depositions will be taken by a person authorized to administer oaths, and will commence at 10:00 a.m. on Monday, April 20, 2015 at offices of Bricker & Eckler LLP and will continue from day to day thereafter until completed.

Respectfully submitted on behalf of  
NRG OHIO PIPELINE COMPANY LLC

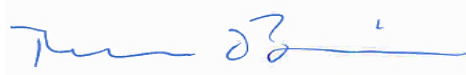


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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Notice of Deposition Duces Tecum has been served upon the following parties listed below via electronic mail, this 15<sup>th</sup> day of April 2015.



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**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**4/15/2015 9:29:59 AM**

**in**

**Case No(s). 14-1717-GA-BLN**

Summary: Notice of Deposition of Duces Tecum by NRG Ohio Pipeline Company LLC  
electronically filed by Teresa Orahod on behalf of Thomas O'Brien