

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application Not for an)
Increase in Rates Pursuant to Section) Case No. 14-1158-EL-ATA
4901.18, Revised Code, of Ohio Power)
Company to Establish Meter Opt Out)
Tariff.)

**NOTICE TO TAKE DEPOSITIONS
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

Pursuant to Ohio Adm. Code Section 4901-1-21(B), please take notice that the Office of the Ohio Consumers' Counsel ("OCC") will take the deposition upon oral examination of the following:

- (1) All witnesses who will be called to testify in support of the Stipulation and Recommendation filed in this case on March 23, 2015.
- (2) The person(s) at Ohio Power Company who responded to OCC's discovery and data requests from the Staff of the Public Utilities Commission of Ohio ("PUCO Staff") in this proceeding.
- (3) The primary person(s) at Ohio Power Company with authority over, knowledge of and familiarity with the installation of smart meters, the replacement of smart meters with analog meters, the meter reading process, costs and savings associated with smart meters, and customer education regarding advanced meters, including explaining the opt-out process to customers. The subjects to be addressed will include, but not be limited to, costs associated with the installation of smart meters, the replacement of smart meters with analog meters, the meter reading process, savings associated with fewer manual reads per month under smart meters, number of opt outs, costs for meter reading included in base rates, operational savings associated with smart meters, and customer education regarding advanced meters.

OCC seeks to conduct the depositions upon oral examination at OCC's offices, 10 W. Broad St., 18th Floor, Columbus, Ohio, at 10:00 a.m. beginning on April 28, 2015, or such other time that is mutually agreed upon by the Parties. 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 this proceeding, including but not limited to, the deponent's knowledge and expertise regarding the installation of smart meters, the replacement of smart meters with analog meters, and the meter reading process. These 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 the taking of his/her deposition the following documents:

1. A copy of all workpapers the deponent used in developing his or her testimony; and
2. A copy of all documents the deponent used in answering OCC discovery and/or PUCO Staff data requests; and
3. A copy of all documents used in deriving the \$43 one-time charge and the \$24 recurring charge for opt-out service; and
4. A copy of all documents explaining the installation of smart meters, the replacement of smart meters with analog meters, the meter reading process, Ohio Power's costs associated with the installation of smart meters and the meter reading process, and the operational savings associated with smart meters; and
5. A copy of all documents used to educate customers regarding advanced meters and the opt-out process.

Respectfully submitted,

BRUCE J. WESTON (0016973)
OHIO CONSUMERS' COUNSEL

/s/ Terry L. Etter

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Notice to Take Depositions and Requests for Production of Documents was served on the persons stated below via electronic transmission this 24th day of April 2015.

/s/ Terry L. Etter
Terry L. Etter
Assistant Consumers' Counsel

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in

Case No(s). 14-1158-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 Etter, Terry L.