

**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. )

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

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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) Andrea Moore and all other 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., 18<sup>th</sup> Floor, Columbus, Ohio, at 10:00 a.m. beginning on April 30, 2015.

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

Terry L. Etter (0067445), Counsel of Record  
Assistant Consumers' Counsel

**Office of the Ohio Consumers' Counsel**

10 West Broad Street, Suite 1800

Columbus, Ohio 43215-3485

Telephone: (614) 466-7964 (Etter direct)

[Terry.etter@occ.ohio.gov](mailto:Terry.etter@occ.ohio.gov)

(willing to accept email service)

Dane Stinson (0019101)

Bricker and Eckler LLP

100 South Third Street

Columbus, Ohio 43215

Telephone: (614) 227-4854

[DStinson@bricker.com](mailto:DStinson@bricker.com)

(willing to accept email service)

Outside Counsel for the

Office of the Ohio Consumers' Counsel

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Amended Notice to Take Depositions and Requests for Production of Documents was served on the persons stated below via electronic transmission this 29<sup>th</sup> day of April 2015.

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

## **SERVICE LIST**

Ryan O'Rourke  
Public Utilities Section  
Attorney General's Office  
180 East Broad Street, 6<sup>th</sup> Floor  
Columbus, Ohio 43215  
[Ryan.orourke@puc.state.oh.us](mailto:Ryan.orourke@puc.state.oh.us)

Attorney Examiner:  
[Bryce.mckenney@puc.state.oh.us](mailto:Bryce.mckenney@puc.state.oh.us)

Steven T. Nourse  
Matthew S. McKenzie  
AEP Service Corporation  
1 Riverside Plaza, 29th Floor  
Columbus, Ohio 43215  
[stnourse@aep.com](mailto:stnourse@aep.com)  
[msmckenzie@aep.com](mailto:msmckenzie@aep.com)

Colleen L. Mooney  
Ohio Partners for Affordable Energy  
231 West Lima Street  
Findlay, OH 45839-1793  
[cmooney@ohiopartners.org](mailto:cmooney@ohiopartners.org)

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

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**Case No(s). 14-1158-EL-ATA**

Summary: Notice of Deposition Amended 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.