

**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 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. Lawrence Makovich
2. Raymond L. Evans
3. Donald Moul
4. Rodney L. Phillips
5. Eileen M. Mikkelsen

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:

- Lawrence Makovich, 9:00 a.m., May 27, 2015;
- Raymond L. Evans, 9:00 a.m., June 3, 2015;
- Rodney L. Phillips, 9:00 a.m., June 4, 2015;
- Donald Moul, 9:00 a.m., June 5, 2015;
- Eileen M. Mikkelsen, 9:00 a.m., June 8, 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 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, any documents relied upon or cited in the deponent's pre-filed testimony, any work

papers that support the deponent's pre-filed testimony, and the results of any studies done for these proceedings and any backup documents, including raw data for such studies.

Respectfully submitted,

/s/ Christopher J. Allwein

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Attorneys for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the Notice to Take Depositions has been filed with the Public Utilities Commission of Ohio and has been served upon the following parties via electronic mail on May 21, 2015.

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/s/Christopher J. Allwein
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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

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in

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

Summary: Notice to Take Depositions of FirstEnergy Witnesses electronically filed by Mr. Christopher J. Allwein on behalf of SIERRA CLUB