

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>In the Matter of the Application Seeking</b>	)	
<b>Approval of Ohio Power Company's</b>	)	
<b>Proposal to Enter into an Affiliate</b>	)	<b>Case No. 14-1693-EL-RDR</b>
<b>Power Purchase Agreement for</b>	)	
<b>Inclusion in the Power Purchase</b>	)	
<b>Agreement Rider</b>	)	
	)	
<b>In the Matter of the Application of</b>	)	
<b>Ohio Power Company for Approval of</b>	)	<b>Case No. 14-1694-EL-AAM</b>
<b>Certain Accounting Authority</b>	)	

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**SECOND AMENDED NOTICE TO TAKE DEPOSITIONS AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS  
BY  
SIERRA CLUB**

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Pursuant to Ohio Adm. Code Rule 4901-1-21(B), please take notice that Sierra Club will take the oral deposition of the following persons, for whom testimony has been filed in the above-captioned matter on behalf of Ohio Power Company ("AEP Ohio"):

1. Pablo A. Vegas, President and Chief Operating Officer, AEP Ohio.
2. Steven M. Fetter, President, Regulation UnFettered.
3. Kelly D. Pearce, Director—Contracts and Analysis, American Electric Power Service Corporation ("AEPSC").
4. Toby L. Thomas, Vice President—Competitive Generation, AEP Generation Resources.
5. Karl R. Bletzacker, Director—Fundamental Analysis, AEPSC.
6. Robert W. Bradish, Vice President—Grid Development, AEPSC.
7. John M. McManus, Vice President—Environmental Services, AEPSC.

8. William A. Allen, Managing Director of Regulatory Case Management, AEPSC.
9. Eric J. Wittine, Manager—Regulatory Research and Issues Analysis, AEPSC.

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 AEPSC's offices, 1 Riverside Plaza, Columbus, Ohio 43215-2373:

- Toby L. Thomas, 9:00 a.m., September 15, 2015.
- Pablo A. Vegas, 9:00 a.m., September 16, 2015.
- Steven M. Fetter, 1:00 p.m., September 16, 2015.
- John M. McManus, 9:00 a.m., September 17, 2015.
- Eric J. Wittine, 9:00 a.m., September 18, 2015.
- Karl R. Bletzacker, 9:00 a.m., September 21, 2015.
- William A. Allen, 9:00 a.m., September 23, 2015.
- Kelly D. Pearce, 9:00 a.m., September 24, 2015.
- Robert W. Bradish, 9:00 a.m., September 25, 2015.

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

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 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 or her deposition, all documents

relating to his or her responsibilities with respect to Case No. 14-1693-EL-RDR et al. and responses to discovery that were authored by the deponent or were provided to Sierra Club or another party to this proceeding 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.

Dated: September 9, 2015

Respectfully submitted,

/s/ Tony G. Mendoza

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Attorneys for Sierra Club

## CERTIFICATE OF SERVICE

I hereby certify that on this date I served a copy of the foregoing Second Amended Notice to Take Depositions and Requests for Production of Documents by Sierra Club upon the following parties via electronic mail.

Date: September 9, 2015

/s/ Tony G. Mendoza

Tony G. Mendoza

### PERSONS SERVED

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	<p>Attorney Examiners:</p> <p>Sarah.Parrot@puc.state.oh.us Greta.see@puc.state.oh.us</p>
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**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**9/9/2015 2:00:43 PM**

**in**

**Case No(s). 14-1693-EL-RDR, 14-1694-EL-AAM**

Summary: Notice of Deposition (Second Amended) and Requests for the Production of Documents electronically filed by Mr. Tony G. Mendoza on behalf of Sierra Club