

**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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**SIERRA CLUB'S NOTICE TO TAKE DEPOSITION OF OHIO ENERGY  
GROUP WITNESS KOLLEN AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS**

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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 person, for whom testimony has been filed in the above-captioned matter on behalf of Ohio Energy Group ("OEG"):

1. Lane Kollen

Sierra Club seeks to conduct the deposition by oral examination of Mr. Kollen at 9 a.m. ET on September 30, 2015, with the deposition to be conducted via telephone. Instructions on how to join the conference call will be circulated to parties to this proceeding. This deposition will continue, from day to day, except for holidays and weekends, until completed. The deponent will join the deposition at the designated time and date with all requested documents (identified below) and remain present until the deposition is completed.

The deposition of the deponent 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 deposition 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, the deponent is requested to produce, two hours prior to his 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 29, 2015

Respectfully submitted,

/s/ Tony G. Mendoza

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## CERTIFICATE OF SERVICE

I hereby certify that on this date I served a copy of the foregoing Sierra Club's Notice to Take Deposition of Ohio Energy Group Witness Kollen and Requests for Production of Documents upon the following parties via electronic mail.

Date: September 29, 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**

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**in**

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

Summary: Notice of Deposition of Ohio Energy Group witness Lane Kollen electronically filed by Mr. Tony G. Mendoza on behalf of Sierra Club