#### **BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

### NOTICE TO TAKE DEPOSITIONS OF AEP OHIO WITNESSES JANE DOE(S) AND JOHN DOE(S) AND REQUESTS FOR PRODUCTION OF DOCUMENTS BY SIERRA CLUB

Pursuant to Ohio Adm. Code Rule 4901-1-21(B), please take notice that Sierra Club will take the oral deposition of Jane Doe(s) and John Doe(s), witness(es) for whom rebuttal testimony may be filed in the above-captioned matter on behalf of Ohio Power Company ("AEP Ohio"). Sierra Club will conduct the deposition of each witness for whom AEP Ohio files rebuttal testimony by oral examination at American Electric Power Company ("AEP") offices, 1 Riverside Plaza, Columbus, Ohio 43215-2373 or another location agreed to by Sierra Club and AEP Ohio. Each deposition will continue, from day to day, except for holidays and weekends, until completed. Each deponent will appear at the offices of AEP (or other agreed-to location) at a time and date agreed to by Sierra Club and AEP Ohio. Each deponent shall appear at the agreed-to location 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 topics related to each witness's rebuttal testimony, 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 rebuttal 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 rebuttal testimony, including, but not limited to, any workpapers relied on for such rebuttal testimony.

Dated: October 22, 2015

Respectfully submitted,

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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 Notice to Take Depositions of AEP Ohio Witnesses Jane Doe(s) and John Doe(s) and Requests for Production of Documents by Sierra Club upon the following parties via electronic mail.

Date: October 22, 2015

/s/ Tony G. Mendoza Tony G. Mendoza

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

Summary: Notice of Deposition of AEP Ohio witnesses Jane Doe(s) and John Doe(s) electronically filed by Mr. Tony G. Mendoza on behalf of Sierra Club