

**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	)	
Power Purchase Agreement for	)	Case No. 14-1693-EL-RDR
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.	)	

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**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 Rule 4901-1-21(B), please take notice that the Office of the Ohio Consumers' Counsel ("OCC") will take the oral deposition of Direct Energy employees who have knowledge and expertise regarding Ohio Power Company's ("AEP Ohio" or "Utility") proposal to enter into an affiliate power purchase agreement for inclusion in the power purchase agreement rider, the Joint Stipulation and Recommendation ("Joint Stipulation") filed on December 15, 2015 in this case, and Direct Energy's position regarding the Joint Stipulation.

OCC seeks to conduct the deposition of these individual(s) upon oral examination at OCC's offices, 10 W. Broad St., 18<sup>th</sup> Floor, Columbus, Ohio, 43215, at 1 p.m. beginning on Tuesday, December 29, 2015. These depositions will continue, 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 these proceedings, including but not limited to, AEP Ohio's proposal to enter into an affiliate power purchase agreement for inclusion in the power purchase agreement rider, the Joint Stipulation and Recommendation filed on December 15, 2015 in this case, AEP Ohio's Application filed on October 3, 2014, the evidentiary hearing, Joint Stipulation negotiations, and the settlement process. 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/her deposition, all documents relating to his/her responsibilities with respect to the Joint Stipulation in Case Nos. 14-1693-EL-RDR and Case No. 14-1694-EL-AAM ,and responses to discovery that were authored by the deponent or were provided to OCC with input from the deponent(s). Additionally, the deponent(s) shall bring any documents in Direct Energy's possession that Direct Energy relied upon to determine whether to sign the Joint Stipulation.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Notice to Take Depositions and Requests for Production of Documents was served via electronic service upon the parties this 23rd day of December, 2015.

/s/ William J. Michael

William J. Michael

Assistant Consumers' Counsel

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

**Commission of Ohio Docketing Information System on**

**12/23/2015 5:10:25 PM**

**in**

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

Summary: Notice of Deposition 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 Michael, William J. Mr.