

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of Jeffrey)	
Pitzer,)	
)	Case No.15-298-GE-CSS
Complainant,)	
)	
v.)	
)	
Duke Energy Ohio, Inc.,)	
)	
Respondent.)	

**NOTICE TO TAKE DEPOSITION
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

Pursuant to Ohio Adm. Code Section 4901-1-21(B), please take notice that the Office of the Ohio Consumers' Counsel ("OCC") will take the deposition upon oral examination of Melissa Porter, who is testifying on behalf of Duke Energy Ohio, Inc. The deposition will be conducted telephonically beginning at 1:30 p.m. on January 7, 2016, and will continue, from day to day, except for holidays and weekends, until completed. Ms. Porter will appear at the designated time and date with all requested documents (identified below) and remain present until deposed.

The deposition will be taken of the aforementioned deponent on relevant topics within the scope of this proceeding, including but not limited to, the subject matter of the deponent's testimony and the deponent's knowledge and expertise with the subject

matter of this proceeding. 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, Ms. Porter is requested to produce, at least two hours prior to the taking of her deposition the following documents:

1. All documents relating to her filed testimony in this proceeding, including but not limited to workpapers; and
2. All responses to discovery requests including, any backup documentation and/or raw data;
3. The results of any studies or analysis conducted for this proceeding; and
4. The documents identified as inserts in Attachment MP-1.

Respectfully submitted,

BRUCE J. WESTON (0016973)
OHIO CONSUMERS' COUNSEL

/s/ Terry L. Etter

Terry L. Etter (0067445), Counsel of Record
Assistant Consumers' Counsel

Office of the Ohio Consumers' Counsel

10 West Broad Street, Suite 1800

Columbus, Ohio 43215-3485

Telephone: (614) 466-7964 (Etter direct)

Terry.etter@occ.ohio.gov

(willing to accept service by e-mail)

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Notice to Take Deposition and Requests for Production of Documents was served on the persons stated below via electronic transmission this 6th day of January 2016.

/s/ Terry L. Etter
Terry L. Etter
Assistant Consumers' Counsel

SERVICE LIST

Robert A. McMahon
Eberly McMahon Copetas LLC
2321 Kemper Lane, Suite 100
Cincinnati, Ohio 45206
bcmahon@emclawyers.com

Amy B. Spiller
Elizabeth H. Watts
139 East Broad Street
Cincinnati, Ohio 45202
Amy.spiller@duke-energy.com
Elizabeth.watts@duke-energy.com

Donald A. Lane
Droder & Miller Co., LPA
125 West Central Parkway
Cincinnati, Ohio 45202-1006
dlane@drodermiller.com

Attorney Examiner:

sarah.parrot@puc.state.oh.us

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

1/6/2016 5:23:59 PM

in

Case No(s). 15-0298-GE-CSS

Summary: Notice of Deposition Notice to Take Deposition and Requests for Production of Documents by the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Etter, Terry L.