

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of the)
Dayton Power and Light Company for an) Case No. 15-1830-EL-AIR
Increase in Electric Distribution Rates.)

In the Matter of the Application of the)
Dayton Power and Light Company for) Case No. 15-1831-EL-AAM
Approval to Change Accounting Methods.)

In the Matter of the Application of the)
Dayton Power and Light Company for) Case No. 15-1832-EL-ATA
Tariff Approval.)

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

To: Michael J. Schuler
 The Dayton Power & Light Company
 1065 Woodman Drive
 Dayton, OH 45432

 Charles J. Faruki
 Counsel of Record
 Faruki Ireland & Cox P.L.L.
 500 Courthouse Plaza, W.W.
 10 North Ludlow Street
 Dayton, OH 45402

Under 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 the following individuals, one after the other, beginning on April 7, 2016 at 1:00 p.m., or at a date and time as mutually agreed upon by OCC and the Dayton Power and Light Company:

- 1) All persons who have knowledge and expertise regarding Dayton Power and Light Company's ("DP&L" or "Utility") Application filed on November 30, 2015 in this case;
- 2) All persons who have knowledge and expertise as to the information OCC requested in its Eighth and Ninth sets of discovery requests;
- 3) All witnesses presenting testimony (direct, supplemental, rebuttal or otherwise) on behalf of the Dayton Power and Light Company; and
- 4) All persons responsible for answering OCC and other Intervenors' (including PUCO Staff) interrogatories, requests for production, and requests for admission served in this proceeding upon Dayton Power And Light Company.

The depositions will take place at the offices of OCC, 10 W. Broad St., 18th Floor, Columbus, Ohio, 43215. The depositions shall begin on April 7, 2016, at 1 p.m. unless otherwise agreed by OCC and the Dayton Power & Light Company. 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 the deposition is completed.

The depositions will be taken of the aforementioned deponents on relevant topics within the scope of these proceedings, including but not limited to, DP&L's Application for a rate increase. The depositions will be taken upon oral examination (as upon cross-examination) before an officer authorized by law to take depositions.

Under 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 the following documents:

- 1) All documents relating to his or her filed testimony in this proceeding, including but not limited to workpapers;
- 2) All responses to discovery including any backup documentation or supporting data or calculations;
- 3) The results of any studies or analysis conducted for this proceeding
- 4) All documents relating to his/her responsibilities with respect to the Application,
- 5) All responses to discovery that were authored by the deponent or were provided to OCC with input from the deponent(s)

Respectfully submitted,

BRUCE J. WESTON (0016973)
OHIO CONSUMERS' COUNSEL

/s/ Jodi Bair
Jodi Bair, (0062921) Counsel of Record
Ajay Kumar (0092208)
Assistant Consumers' Counsel

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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 21st day of March, 2016.

/s/ Jodi Bair
Jodi Bair
Assistant Consumers' Counsel

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Case No(s). 15-1830-EL-AIR, 15-1831-EL-AAM, 15-1832-EL-ATA

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. Jamie Williams on behalf of Bair, Jodi Mrs.