

Ohio Schools Council, Ohio School Boards )  
 Association, Ohio Association of School )  
 Business Officials, and Buckeye )  
 Association of School Administrators, dba )  
 Power4Schools ) **CASE NO. 14-1182-EL-CSS**  
 )  
**Complainants,** )  
 )  
**v.** )  
 )  
**FirstEnergy Solutions Corp.** )  
 )  
**Respondent.** )

PLEASE TAKE NOTICE that counsel for FirstEnergy Solutions Corp. (“FES”), pursuant to O.A.C. 4901-1-21(F), shall take the deposition of corporate designee(s) of Buckeye Association of School Administrators (“BASA”) on the matters listed on Exhibit A attached hereto commencing on Thursday, June 2, 2016, at 1:00 p.m. and continuing from day to day thereafter until completed. The deposition will be taken at the offices of Calfee, Halter & Griswold LLP, 1200 Huntington Center, 41 South High Street, Columbus, OH 43215. The deposition shall take place before a certified court reporter, notary public, or duly authorized officer, authorized by law to administer oaths.

Respectfully Submitted,

/s/ Mark A. Hayden

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## **EXHIBIT A**

You are directed to designate one or more corporate designees to testify to the following subject matters and any other matters relevant thereto:<sup>1</sup>

1. The factual allegations made by BASA in the Complaint filed on July 3, 2014 in PUCO Case No. 14-1182-EL-CSS.
2. BASA's negotiation of the Master Agreement, effective April 1, 2011, with FES.
3. Representations made by FES to BASA regarding the terms of the Master Agreement prior to BASA entering into the Master Agreement.
4. BASA's negotiation of the First Amended Master Agreement, effective April 1, 2011, with FES.
5. Representations made by FES to BASA regarding the terms of the First Amended Master Agreement prior to BASA entering into the First Amended Master Agreement.
6. The terms of Supply Contracts entered into between FES and BASA members.
7. Representations made by FES to BASA members regarding the terms of the Supply Contracts prior to BASA members entering into Supply Contracts with FES.
8. FES's administration of the Supply Contracts with Participating Members.
9. FES's disclosure of contract terms in the Supply Contracts with Participating Members.
10. The "additional costs and charges" deemed a Pass-Through Event by FES as described in paragraphs 51 and 52 of the Complaint.

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<sup>1</sup> Capitalized terms have the same meaning as used in the Complaint filed by BASA and others on July 3, 2014 in PUCO Case No. 14-1182-EL-CSS.

**CERTIFICATE OF SERVICE**

A copy of the foregoing Notice of Deposition was served via e-mail delivery this 26th day of May, 2016 upon via e-mail upon the parties below.

/s/ James F. Lang  
One of the Attorneys for FirstEnergy Solutions Corp.

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**Case No(s). 14-1182-EL-CSS**

Summary: Notice of Deposition to Buckeye Association of School Administrators electronically filed by Mr. James F Lang on behalf of FirstEnergy Solutions Corp.