# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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

# FIRSTENERGY SOLUTIONS CORP.'S NOTICE OF DEPOSITION DIRECTED TO OHIO SCHOOL BOARDS ASSOCIATION

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 Ohio School Boards Association ("OSBA") on the matters listed on Exhibit A attached hereto commencing on Friday, June 3, 2016, at 8:30 a.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

Mark A. Hayden (0081077)
FIRSTENERGY SERVICE COMPANY
76 South Main Street
Akron, OH 44308
(330) 761-7735, 384-5038
(330) 384-3875 (fax)
haydenm@firstenergycorp.com

James F. Lang (0059668)
N. Trevor Alexander (0080713)
CALFEE, HALTER & GRISWOLD LLP
The Calfee Building
1405 East Sixth Street
Cleveland, OH 44114
(216) 622-8200
(216) 241-0816 (fax)
jlang@calfee.com
talexander@calfee.com

Attorneys for FirstEnergy Solutions Corp.

#### **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 OSBA in the Complaint filed on July 3, 2014 in PUCO Case No. 14-1182-EL-CSS.
  - 2. OSBA's negotiation of the Master Agreement, effective April 1, 2011, with FES.
- 3. Representations made by FES to OSBA regarding the terms of the Master Agreement prior to OSBA entering into the Master Agreement.
- 4. OSBA's negotiation of the First Amended Master Agreement, effective April 1, 2011, with FES.
- 5. Representations made by FES to OSBA regarding the terms of the First Amended Master Agreement prior to OSBA entering into the First Amended Master Agreement.
  - 6. The terms of Supply Contracts entered into between FES and OSBA members.
- 7. Representations made by FES to OSBA members regarding the terms of the Supply Contracts prior to OSBA 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>&</sup>lt;sup>1</sup> Capitalized terms have the same meaning as used in the Complaint filed by OSBA 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.

Dane Stinson BRICKER & ECKLER 100 South Third Street Columbus, OH 43215 dstinson@bricker.com Glenn S. Krassen BRICKER & ECKLER 1001 Lakeside Avenue, Suite 1350 Cleveland, OH 44114 gkrassen@bricker.com This foregoing document was electronically filed with the Public Utilities

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

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