BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Aqua Ohio, Inc. to Increase Its Rates and Charges for Its Waterworks Service.

Case No. 16-907-WW-AIR

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

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:

- All persons who will be called by Aqua Ohio, Inc. ("Company" or "Aqua") to present testimony, including direct, supplemental, rebuttal, surrebuttal, and any other form of testimony filed, or to be filed in these proceedings; and
- 2. All persons responsible for answering interrogatories, data requests and/or responding to requests for production of documents (including responses that state that no documents are responsive to a request to produce) served in these proceedings upon Aqua.

OCC seeks to conduct the deposition of these individual(s) upon oral examination at OCC's offices, 10 W. Broad St., 18th Floor, Columbus, Ohio, 43215, at date and time that is mutually agreeable to the parties. The depositions will continue, one-after-theother, from day to day, except for holidays and weekends, until completed. Each deponent will appear at the agreed upon place 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, the subject matter of the deponent's testimony and the deponent's knowledge and expertise with the subject matter of these proceedings. 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, all documents relating to his/her responsibilities with respect to Case No. 16-907-WW-AIR and responses to discovery that were authored by the deponent or were provided to OCC with input from the deponent. Additionally, the deponent shall bring documents, including, but not limited to, the results of any studies done for these proceedings and any backup documents, including raw data for such studies, any documents relied upon or cited in the pre-filed testimony, and any workpapers that support the pre-filed testimony. Respectfully submitted,

BRUCE WESTON (0016973) OHIO CONSUMERS' COUNSEL

<u>/s/ Kevin Moore</u> Kevin F. Moore (0089228) Counsel of Record Ajay Kumar (0092208) Assistant Consumers' Counsel

Office of the Ohio Consumers' Counsel

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CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing Notice to Take Depositions and Request for Production of Documents was served by electronic transmission upon the parties below this 6th day of January, 2017.

> <u>/s/ Kevin Moore</u> Kevin Moore Assistant Consumers' Counsel

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

1/6/2017 2:03:28 PM

in

Case No(s). 16-0907-WW-AIR

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 Moore, Kevin F. Mr.