# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke Energy Ohio, Inc. for an Increase in Electric Distribution Rates.	) Case No. 17-0032-EL-AIR
In the Matter of the Application of Duke Energy Ohio, Inc. for Tariff Approval.	) Case No. 17-0033-EL-ATA
In the Matter of the Application of Duke Energy Ohio, Inc. for Approval to Change Accounting Methods.	) ) Case No. 17-0034-EL-AAM )
In the Matter of the Application of Duke Energy Ohio, Inc. for Authority to Establish Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan, Accounting Modifications and Tariffs for Generation Service.	) ) ) Case No. 17-1263-EL-SSO ) )
In the Matter of the Application of Duke Energy Ohio, Inc. for Authority to Amend its Certified Supplier Tariff, P.U.C.O. No. 20.	) ) Case No. 17-1264-EL-ATA )
In the Matter of the Application of Duke Energy Ohio, Inc. for Authority to Defer Vegetation Management Costs.	) ) Case No. 17-1265-EL-AAM )

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

In accordance with Ohio Administrative Code 4901-1-21(B), please take notice that the Office of the Ohio Consumers' Counsel ("OCC") will take the deposition upon oral examination of Donald L. Schneider, Jr. The deposition will be conducted at 400 South Tryon Street, Charlotte, North Carolina, beginning at 12:00 p.m. on December 6,

2017, and will continue from day to day, except for holidays and weekends, until completed. Mr. Schneider will appear at the designated time and date with all requested documents (identified below) and will remain present until deposed.

The deposition will be taken of the aforementioned deponent on relevant topics within the scope of these proceedings, including but not limited to, (i) the deponent's prefiled testimony in these cases, (ii) the subject matter of the responses to discovery requests for which the deponent is the respondent, and (iii) the deponent's knowledge and expertise with the subject matter of these proceedings. The deposition will be taken upon oral examination (as upon cross-examination) before an officer authorized by law to take depositions.

Pursuant to Ohio Administrative Code 4901-1-21(E) and 4901-1-20, OCC requests that the deponent produce, at least two hours prior to the taking of his deposition, all documents relating to the discovery responses in these cases for which Mr. Schneider is the respondent, including but not limited to workpapers, calculations, analyses, studies, or similar documents.

## Respectfully submitted,

# BRUCE WESTON (0016973) OHIO CONSUMERS' COUNSEL

### /s/ William J. Michael

William J. Michael (0070921) Counsel of Record Kevin Moore (0089228) Christopher Healey (0086027) Assistant Consumers' Counsel

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Outside Counsel for the Office of the Ohio Consumers' Counsel

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Notice to Take Deposition and Request for Production of Documents was served on the persons stated below via electronic transmission on November 9, 2017.

/s/ William J. Michael

William J. Michael Assistant Consumers' Counsel

#### SERVICE LIST

#### Case No. 17-0032-EL-AIR et al:

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#### Case No. 17-1263-EL-SSO et al:

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Summary: Notice of Deposition Notion to Take Deposition and Request for Production of Documents by the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Michael, William J. Mr.