

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Cynthia Wingo,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. 17-2002-EL-CSS
	)	
Nationwide Energy Partners, LLC, et al.,	)	
	)	
Respondents.	)	
	)	

**COMPLAINANT’S NOTICE OF DEPOSITION *DUCES TECUM***

Please take notice that on January 29, 2018, Complainant’s counsel will take the deposition of John Calhoun, Account Manager for Respondent Nationwide Energy Partners, LLC (NEP). The deposition will commence at 10:00 a.m. at the offices of Whitt Sturtevant LLP, 88 E. Broad St., Suite 1590, Columbus, Ohio 43215, and continue until completed.

Pursuant to Rules 4901-1-21(B) and (E), O.A.C., the deponent shall produce the following documents at or before the deposition:

1. The contracts between NEP and CAC I and CAC II, referenced in paragraphs 7 and 8 of Mr. Calhoun’s November 7, 2017 affidavit submitted with NEP’s motion to dismiss in this proceeding.
2. All invoices paid on behalf of CAC (as referenced in paragraph 10 of Mr. Calhoun’s affidavit) during calendar year 2017.
3. All documents evidencing any energy efficiency consultation, high usage alert, or vacant usage report furnished by NEP in calendar year 2017. *See* Calhoun affidavit, paragraph 11.

4. Each contract between or among AEP Ohio and CAC. *See* Calhoun affidavit, paragraphs 12 and 13.
5. The contract between IGS and CAC referenced at paragraph 13 of Mr. Calhoun's affidavit.
6. Each contract between CAC and the City of Reynoldsburg relating to water and/or sewer service.
7. All documents pertaining to or evidencing the "2011 conversion from individually-metered to master-metered service" referenced in paragraph 17 of Mr. Calhoun's affidavit.
8. The "programs" used to calculate AEP Ohio charges during calendar year 2017. *See* Calhoun affidavit, paragraph 18.
9. All data and information considered in performing the calculations referenced in paragraphs 19 and 20 of Mr. Calhoun's affidavit.
10. All bills rendered to Complainant.
11. All account records pertaining to Complainant.
12. All notices, correspondence, or other communications with Complainant.
13. All documents reviewed by Mr. Calhoun in preparing his affidavit.

Dated: January 9, 2018

Respectfully submitted,

s/ Mark A. Whitt

---

Mark A. Whitt  
(Counsel of Record)  
Andrew J. Campbell  
Rebekah Glover  
**WHITT STURTEVANT LLP**  
88 E. Broad St., Suite 1590  
Columbus, Ohio 43215  
614.224.3911  
614.224.3960 (f)  
whitt@whitt-sturtevant.com  
campbell@whitt-sturtevant.com  
glover@whitt-sturtevant.com

Shawn J. Organ  
Joshua M. Feasel  
Carrie M. Lymanstall  
**ORGAN COLE LLP**  
1330 Dublin Road  
Columbus, Ohio 43215  
614.481.0900  
614.481.0904 (f)  
sjorgan@organcole.com  
jmfeasel@organcole.com  
cmlymanstall@organcole.com

Attorneys for Complainant

## **CERTIFICATE OF SERVICE**

This document was filed via the Commission's e-filing system on January 9, 2018. Parties who have subscribed to electronic service will receive notice of this filing from the Commission. Service is also being made this day to the following persons by email:

Michael J. Settineri	<a href="mailto:mjsettineri@vorys.com">mjsettineri@vorys.com</a>
William A. Sieck	<a href="mailto:wasieck@vorys.com">wasieck@vorys.com</a>
Gretchen L. Petrucci	<a href="mailto:glpetrucci@vorys.com">glpetrucci@vorys.com</a>
Christopher J. Allwein	<a href="mailto:callwein@keglerbrown.com">callwein@keglerbrown.com</a>
Barth Royer	<a href="mailto:barthroyer@aol.com">barthroyer@aol.com</a>
Steven T. Nourse	<a href="mailto:snourse@aep.com">snourse@aep.com</a>
Christen M. Blend	<a href="mailto:cblend@aep.com">cblend@aep.com</a>

*s/ Mark A. Whitt*

---

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**1/9/2018 1:20:16 PM**

**in**

**Case No(s). 17-2002-EL-CSS**

Summary: Notice of Deposition of John Calhoun electronically filed by Ms. Rebekah J. Glover  
on behalf of Ms. Cynthia Wingo