#### BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the 2018 Long-Term	)	
Forecast Report on behalf of Ohio Power	)	Case No. 18-0501-EL-FOR
Company and Related Matters.	)	
In the Matter of the Application Seeking	)	
Approval of Ohio Power Company's	)	
Proposal to Enter into Renewable Energy	)	Case No. 18-1392-EL-RDR
Purchase Agreements for Inclusion in the	)	
Renewable Generation Rider.	)	
In the Matter of the Application of Ohio	)	Case No. 18-1393-EL-ATA
Power Company to Amend its Tariffs.	)	

### NOTICE TO TAKE DEPOSITION UPON ORAL EXAMINATION OF AN INTERSTATE GAS SUPPLY, INC. REPRESENTATIVE AND REQUEST 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 a

representative(s) of Interstate Gas Supply, Inc. ("IGS") with knowledge of:

- AEP Ohio's Rate-Ready and Bill-Ready billing options, and how IGS determines which of its customers will be Rate-Ready and Bill-Ready;
- 2. Direct customer billing to Ohio customers by IGS (duel-billing);
- 3. Specific rate information furnished by IGS to AEP Ohio, including rate information that is in production within AEP Ohio's billing system;

- How IGS calculates charges for bills that are rendered by AEP
  Ohio under the Bill-Ready option;
- AEP Ohio's Tariff, Supplier Terms and Conditions of Service, and IGS's compliance therewith;
- How the rate information that is in production within AEP Ohio's billing system is provided to AEP Ohio;
- 7. The electronic transmission of Ohio customer billing data;
- 8. Charge descriptions provided to AEP Ohio;
- 9. How charge descriptions provided to AEP Ohio are developed;
- 10. IGS's product offerings in Ohio;
- 11. The prices of IGS's product offerings in Ohio;
- IGS's processes, procedures, and data management for complying with the reporting requirements under Ohio Administrative Code 4901:1-25-02(A)(3);
- 13. IGS's standard contract forms; and
- Assigning a number to each version of each of IGS's standard contract forms (including changes in contract price).

The deposition will take place at the offices of OCC, 65 East State Street, 7<sup>th</sup> Floor, Columbus, Ohio 43215, and will begin at 10:00 a.m. on Friday, December 7, 2018. Deponent(s) will appear at designated time with documents at OCC and remain present until depositions are completed. Parties are invited to attend and cross-examine. The deposition will be taken upon oral examination (as upon cross-examination)

before an officer authorized by law to take depositions and will continue from day to day,

except for holidays and weekends, until completed.

Under Ohio Adm. Code Rules 4901-1-21(E) and 4901-1-20, the deponent is requested to produce at the time of deposition all documents relating to the subject matters listed above.

Respectfully submitted,

Bruce Weston (0016973) Ohio Consumers' Counsel

<u>/s/ William J. Michael</u> Maureen R. Willis, Counsel of Record Senior Counsel (0020847) William J. Michael (0070921) Christopher Healey (0086027) Assistant Consumers' Counsel

#### Office of the Ohio Consumers' Counsel

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#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Notice to Take Deposition of an IGS

Representative by the Office of the Ohio Consumers' Counsel was served on the persons

stated below via electronic transmission this 29<sup>th</sup> day of November 2018.

<u>/s/ William Michael</u> William Michael Assistant Consumer's Counsel

#### SERVICE LIST

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## Case No(s). 18-0501-EL-FOR, 18-1392-EL-RDR, 18-1393-EL-ATA

Summary: Notice of Deposition Notice to Take Deposition Upon Oral Examination of an Interstate Gas Supply, Inc. Representative 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.