## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Commission's	)	
Investigation into PALMco Power	)	Case No. 19-0957-GE-COI
OH, LLC dba Indra Energy and	)	
PALMco Energy OH, LLC dba Indra	)	
Energy's Compliance with the Ohio	)	
Administrative Code and Potential	)	
Remedial Actions for Non-	)	
Compliance.	)	

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

In accordance with Ohio Adm. Code Section 4901-1-21(B), please take notice that the Office of the Ohio Consumers' Counsel ("OCC") will take the deposition upon oral examination of any and all witnesses of PALMco Power OH, LLC dba Indra Energy and PALMco Energy OH, LLC dba Indra Energy ("PALMco") in this case.

The deposition will be conducted at OCC's offices, 65 East State Street, 7<sup>th</sup> Floor, Columbus, Ohio, 43215, beginning at 10:00 a.m. on May 30, 2019, or at another time and date agreed upon by OCC and PALMco, and will continue from day to day, except for holidays and weekends, until completed. The deponent(s) 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(s) on relevant topics within the scope of this proceeding, including but not limited to, each 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 Adm. Code Rules 4901-1-21(E) and 4901-1-20, OCC requests that each deponent produce, at least two hours prior to the taking of his/her deposition, the following documents:

- 1. A copy of the deponent's testimony filed in this case;
- 2. A copy of all workpapers the deponent used in developing his/her testimony; and
- 3. A copy of all documents the deponent used in answering OCC discovery and/or PUCO Staff data requests.

Respectfully submitted,

Bruce Weston (0016973) Ohio Consumers' Counsel

#### /s/ Terry L. Etter

Terry L. Etter (0067445), Counsel of Record Amy Botschner O'Brien (0074423) Assistant Consumers' Counsel

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(willing to accept service by e-mail)

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Notice to Take Deposition and Requests for Production of Documents was served on the persons stated below via electronic transmission this  $20^{th}$  day of May 2019.

/s/ Terry L. Etter
Terry L. Etter

Assistant Consumers' Counsel

#### **SERVICE LIST**

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Case No(s). 19-0957-GE-COI

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 Etter, Terry L.