

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

**MOTION FOR ISSUANCE OF SUBPOENAS
SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO**

The Staff of the Public Utilities Commission of Ohio (Staff) respectfully requests that the Commission, the Legal Director, or the Attorney Examiner to issue subpoenas requiring the following persons: Martin Bowen, Sharon Traylor, and Leroy Sellers to attend and give testimony at the hearing scheduled in the above-captioned case at 10:00 a.m. on June 4, 2019 and Robert Steele to attend and give testimony at the hearing in this case at 10 a.m. on June 5, 2019 at the offices of the Public Utilities Commission of Ohio, 180 East Broad Street, 11th Floor, Columbus, Ohio. This request is made pursuant to Ohio Adm.Code 4901-1-25(A).

The testimony of these witnesses is necessary in order for the Public Utilities Commission of Ohio (Commission) to evaluate whether PALMco Power OH, LLC dba Indra Energy has failed to comply with any applicable certification standards or has

engaged in anticompetitive or unfair, deceptive, or unconscionable acts or practices in this state.

All of these witnesses are residential consumers who have contacted the Staff concerning practices of PALMco Power OH, LLC dba Indra Energy. The proposed Subpoenas are appended to this motion. Upon receiving the original signed subpoenas, counsel for Staff will effectuate service by certified mail as authorized by Ohio Adm.Code 4901-1-25(B).

Respectfully submitted,

Dave Yost
Ohio Attorney General

John H. Jones
Section Chief



Jodi J. Bair
Assistant Attorney General
Public Utilities Section
30 East Broad Street, 16th Floor
Columbus, Ohio 43215-3414
614.644.8599 (telephone)
866-388-1479 (facsimile)
john.jones@ohioattorneygeneral.gov
jodi.bair@ohioattorneygeneral.gov

**On Behalf of the Staff of the
Public Utilities Commission of Ohio**

CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing **Motion for Issuance of Subpoenas** was served by regular United States mail or via electronic mail, upon the following parties of record, this 24th day of May 2019.



Jodi J. Bair
Assistant Attorney General

Parties of Record:

Jennifer Coleman

PALMco Energy OH, LLC, dba Indra
Energy
8751 18th Avenue
Brooklyn, New York 11214
regulatory@indraenergy.com

Terry L. Etter

Office of the Ohio Consumers' Counsel
65 East State Street, 7th Floor
Columbus, Ohio 43215-4203
terry.etter@occ.ohio.gov

Mark Whitt

Rebekah Glover

Whitt Sturtevant
88 East Broad Street, Suite 1590
Columbus, Ohio 43215
whitt@whitt-sturtevant.com
glover@whit-sturtevant.com

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SUBPOENA

TO:

Martin Bowen
312 Rocky Fork Drive North
Columbus, Ohio 43230

Upon application of the Staff of the Public Utilities Commission of Ohio (Staff), you are hereby required to attend and make yourself available to give oral testimony at the hearing commencing June 4, 2019, at 10:00 a.m., and continuing from day to day until complete at the offices of the Public Utilities Commission of Ohio, 180 East Broad Street, 11th Floor, Room 11-D, Columbus, Ohio.

You shall attend and make yourself available from day to day to be called by the Staff as a witness.

This Subpoena is issued under the authority granted to the Public Utilities Commission of Ohio (Commission) in Sections 4901.22, 4903.02, 4903.03, 4903.04, 4905.05, and 4905.06 of the Ohio Revised Code.

If any person fails to obey a subpoena, the Commission may seek appropriate judicial relief against such person.

Dated this 24th day of May, 2019,



Attorney Examiner, Public Utilities
Commission of Ohio

RETURN: I hereby certify that I served the within subpoena on Martin Bowen, on the 24th day of May, 2019, by mailing the subpoena via United States mail as certified or express mail, return receipt requested. A true copy of the signed receipt is attached hereto.

Signed,



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SUBPOENA

TO:

Sharon Traylor
2155 Grasmere Avenue
Columbus, Ohio 43211

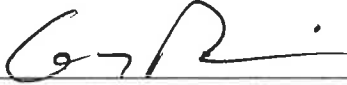
Upon application of the Staff of the Public Utilities Commission of Ohio (Staff), you are hereby required to attend and make yourself available to give oral testimony at the hearing commencing June 4, 2019, at 10:00 a.m., and continuing from day to day until complete at the offices of the Public Utilities Commission of Ohio, 180 East Broad Street, 11th Floor, Room 11-D, Columbus, Ohio.

You shall attend and make yourself available from day to day to be called by the Staff as a witness.

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If any person fails to obey a subpoena, the Commission may seek appropriate judicial relief against such person.

Dated this 24th day of May, 2019,



Attorney Examiner, Public Utilities
Commission of Ohio

RETURN: I hereby certify that I served the within subpoena on Sharon Traylor, on the 24th day of May, 2019, by mailing the subpoena via United States mail as certified or express mail, return receipt requested. A true copy of the signed receipt is attached hereto.

Signed,



**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's	:	
Investigation into PALMco Power OH,	:	
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with the Ohio Administrative Code and	:	
Potential Remedial Actions for Non-	:	
Compliance.	:	

SUBPOENA

TO:

Leroy Sellers
649 North Nelson Road, Apartment A
Columbus, Ohio 43219

Upon application of the Staff of the Public Utilities Commission of Ohio (Staff), you are hereby required to attend and make yourself available to give oral testimony at the hearing commencing June 4, 2019, at 10:00 a.m., and continuing from day to day until complete at the offices of the Public Utilities Commission of Ohio, 180 East Broad Street, 11th Floor, Room 11-D, Columbus, Ohio.

You shall attend and make yourself available from day to day to be called by the Staff as a witness.

This Subpoena is issued under the authority granted to the Public Utilities Commission of Ohio (Commission) in Sections 4901.22, 4903.02, 4903.03, 4903.04, 4905.05, and 4905.06 of the Ohio Revised Code.

If any person fails to obey a subpoena, the Commission may seek appropriate judicial relief against such person.

Dated this 24th day of May, 2019,



Attorney Examiner, Public Utilities
Commission of Ohio

RETURN: I hereby certify that I served the within subpoena on Leroy Sellers, on the 24th day of May, 2019, by mailing the subpoena via United States mail as certified or express mail, return receipt requested. A true copy of the signed receipt is attached hereto.

Signed,



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THE PUBLIC UTILITIES COMMISSION OF OHIO**

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Potential Remedial Actions for Non-	:	
Compliance.	:	

SUBPOENA

TO:

Robert Steele
1356 Benvue Drive
Columbus, Ohio 43207

Upon application of the Staff of the Public Utilities Commission of Ohio (Staff), you are hereby required to attend and make yourself available to give oral testimony at the hearing commencing June 5, 2019, at 10:00 a.m., and continuing from day to day until complete at the offices of the Public Utilities Commission of Ohio, 180 East Broad Street, 11th Floor, Room 11-D, Columbus, Ohio.

You shall attend and make yourself available from day to day to be called by the Staff as a witness.

This Subpoena is issued under the authority granted to the Public Utilities Commission of Ohio (Commission) in Sections 4901.22, 4903.02, 4903.03, 4903.04, 4905.05, and 4905.06 of the Ohio Revised Code.

If any person fails to obey a subpoena, the Commission may seek appropriate judicial relief against such person.

Dated this 24th day of May, 2019,



Attorney Examiner, Public Utilities
Commission of Ohio

RETURN: I hereby certify that I served the within subpoena on Robert Steele, on the 24th day of May, 2019, by mailing the subpoena via United States mail as certified or express mail, return receipt requested. A true copy of the signed receipt is attached hereto.

Signed,



This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/24/2019 3:28:54 PM

in

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

Summary: Motion for Issuance of Subpoenas and Subpoenas for Martin Bowen, Sharon Traylor, Leroy Sellers, and Robert Steele electronically filed by Ms. Yvette L Yip on behalf of the Public Utilities Commission of Ohio