

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's	)	
Investigation into Verde Energy	)	
USA Ohio, LLC's Compliance with	)	Case No. 19-0958-GE-COI
the Ohio Administrative Code and	)	
Potential Remedial Actions for	)	
Non-Compliance.	)	

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

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Please take notice under Ohio Adm. Code 4901-1-21(B) that the Office of the Ohio Consumers' Counsel ("OCC") will take the oral depositions of the following individuals, one after the other, beginning on October 7, 2019 at 10:00 a.m. Eastern Time, or at a date and time as mutually agreed upon by OCC and Verde Energy USA Ohio, LLC ("Verde"):

- a) All persons who have knowledge or expertise regarding the PUCO Staff's finding that a consumer received a call from Verde on his work phone where the caller ID displayed US GOVT IRS 513-263-578. *See Staff Report at 11 (May 29, 2019).*
- b) All persons who have knowledge or expertise regarding the PUCO Staff's finding that several consumers received a call from Verde in which the caller ID displayed numbers that began with 513-287 and 513-262, which are the area code and prefixes in use by Duke Energy Ohio employees in Cincinnati, Ohio. *See Staff Report at 11 (May 29, 2019).*
- c) All persons who have knowledge or expertise regarding the PUCO Staff's finding that a customer received a call from Jack Jordan (Verde ID # 121125) in which the caller ID indicated that the call was from the Illuminating Company. *See Staff Report at 11 (May 29, 2019).*
- d) All persons who have knowledge or expertise regarding the PUCO Staff's finding that a Verde sales representative spoofed the number of a local utility toll-free customer service number (800-672-2231). *See Staff Report at 11 (May 29, 2019).*
- e) All persons who have knowledge or expertise regarding the information sought by OCC in its sixth set of discovery served on Verde on September 25, 2019.

The depositions will take place at the offices of OCC, 65 E. State St., 7th Floor, Columbus, Ohio 43215, at a location mutually agreeable to OCC and Verde, or telephonically if mutually agreeable to OCC and Verde. The deponents will appear at the agreed upon place at the designated time and date and remain present until deposed.

The depositions will be taken of the aforementioned deponents on relevant topics within the scope of these proceedings. The depositions will be taken upon oral

examination (as upon cross-examination) before an officer authorized by law to take depositions.

Under Ohio Adm. Code Rules 4901-1-21(E) and 4901-1-20, each deponent is requested to produce, within seven days of this deposition notice, the following documents:

1. A copy of the deponent's resume and/or C.V.
2. All documents related to the deponent's knowledge or expertise of the subjects identified in paragraphs (a) through (e) above.

Respectfully submitted,

Bruce Weston (0016973)  
Ohio Consumers' Counsel

/s/ Angela D. O'Brien  
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*The Office of the Ohio Consumers' Counsel*

## **CERTIFICATE OF SERVICE**

It is hereby certified that a true copy of the foregoing Notice to Take Depositions and Requests for Production of Documents was served by electronic transmission upon the parties below this 26th day of September 2019.

/s/ Angela D. O'Brien  
Angela D. O'Brien  
Assistant Consumers' Counsel

The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

### **SERVICE LIST**

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

**Commission of Ohio Docketing Information System on**

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**Case No(s). 19-0958-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 Mrs. Tracy J Greene on behalf of O'Brien, Angela