

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke Energy Ohio, Inc., for an Adjustment to Rider MGP Rates.)))	Case No. 14-375-GA-RDR
In the Matter of the Application of Duke Energy Ohio, Inc., for Tariff Approval.))	Case No. 14-376-GA-ATA
In the Matter of the Application of Duke Energy Ohio, Inc., for an Adjustment to Rider MGP Rates.)))	Case No. 15-452-GA-RDR
In the Matter of the Application of Duke Energy Ohio, Inc., for Tariff Approval.))	Case No.15-453-GA-ATA
In the Matter of the Application of Duke Energy Ohio, Inc., for an Adjustment to Rider MGP Rates.)))	Case No. 16-542-GA-RDR
In the Matter of the Application of Duke Energy Ohio, Inc., for Tariff Approval.))	Case No. 16-543-GA-ATA
In the Matter of the Application of Duke Energy Ohio, Inc., for an Adjustment to Rider MGP Rates.)))	Case No.17-596-GA-RDR
In the Matter of the Application of Duke Energy Ohio, Inc., for Tariff Approval.))	Case No.17-597-GA-ATA
In the Matter of the Application of Duke Energy Ohio, Inc., for an Adjustment to Rider MGP Rates.)))	Case No.18-283-GA-RDR
In the Matter of the Application of Duke Energy Ohio, Inc., for Tariff Approval.))	Case No.18-284-GA-ATA

In the Matter of the Application of Duke)
Energy Ohio, Inc., for an Adjustment to) Case No. 19-174-GA-RDR
Rider MGP Rates.)

In the Matter of the Application of Duke)
Energy Ohio, Inc., for Tariff Approval.) Case No. 19-175-GA-ATA

**NOTICE OF DUKE ENERGY OHIO, INC.,
TO TAKE DEPOSITION *DUCES TECUM* OF
JAMES R. CAMPBELL**

Pursuant to Ohio Admin. Code Rule 4901-1-21(B), please take notice that Duke Energy Ohio, Inc., (Duke Energy) will take the oral deposition of James R. Campbell on November 8, 2019, beginning at 10:00 A.M. and continuing day-to-day thereafter until complete.

The depositions will take place at Duke Energy Ohio's offices located at 139 East Fourth Street, Cincinnati, Ohio 45202. The depositions will be taken upon oral examination (as if on cross-examination) before an officer authorized by law to take depositions.

Pursuant to Ohio Admin. Code 4901-1-21(E) and 4901-1-20, all witnesses are requested to produce at the time of their deposition true and accurate copies of the documents identified in Exhibit A.

Parties are invited to attend and to cross-examine.

Respectfully submitted,

DUKE ENERGY OHIO, INC.

/s/ Rocco D'Ascenzo

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EXHIBIT A

Duke Energy Ohio hereby requests that, at the time and place set forth above in the notice of deposition, *duces tecum*, each deponent produce true and accurate copies of the following documents:

1. Any and all documents that were reviewed by said deponent for purposes of preparing direct testimony relative to the above-captioned proceeding.
2. Any and all documents created or authored by said deponent for purposes of preparing direct testimony relative to the above-captioned proceeding, including but not limited to any calculations in preparing the recommendations in Table 1 and Table 2 of the direct testimony.
3. Any and all documents referenced in the witness's direct testimony relative to the above-captioned proceeding.
4. Any and all documents reviewed by said deponent in preparing, or otherwise assisting in the preparation of, discovery responses submitted by OCC relative to the above-captioned proceeding
5. Any and all documents prepared by said deponent for purposes of preparing, or otherwise assisting in the preparation of, discovery responses submitted by OCC relative to the above-captioned proceeding.
6. Any and all expert reports, transcripts, or testimony testimonies, reports, analyses, letters, affidavits, declarations, and/or opinions the witness has offered or authored in any case involving investigation, cleanup and/or remediation of manufactured gas plants or tar distillation facilities, including and not limited to the following cases listed in Dr. James R. Campbell's *curriculum vitae*:
 - Cost Recovery at Former Coke Plant and Tar Distillation Sites, Analysis of Coke Plant Operations, Declaration in Support of Motion to Intervene, United States of America v. ExxonMobil Corporation, U.S. District Court for the Northern District of West Virginia, Case No. 1:08-CV-124, 2009.
 - Allocation Mediation at Former Manufactured Gas Plant/Tar Distillation Facility, Analysis of Tar Plant Operations, Expert Report, Mediation discussion support, 2009 (confidential).
 - Allocation Arbitration at Former Coke Plant/Tar Distillation Facility, Analysis of Coke and Tar Plant Operations, Expert Report, Deposition and Arbitration Hearing Testimony, 2006-2007 (confidential).
 - Cost Recovery at Former Manufactured Gas Plant/Tar Plant Site, Analysis of Plant Operations, Beazer East, Inc. v. KeySpan Energy Services, Inc.

and KeySpan Corporation v. Beazer East, Inc. and Honeywell International, Inc. in the United States District Court, Eastern District of New York, Case No. 02-CV-3728, 2004.

- Cost Recovery at Former Manufactured Gas Plant Site, Analysis of Plant Operations, Expert Report and Deposition Testimony, New Jersey Natural Gas Company v. St. Paul Fire & Marine Insurance Company, et al., Docket No. OCN-L-859-95, Superior Court New Jersey, Law Division: Ocean County, 2002.
- Cost Recovery at Former Manufactured Gas Plant Site, Analysis of Plant Operations, Expert Report and Deposition Testimony, Niagara Mohawk Power Corporation v. Consolidated Rail Corporation et al., Case No. 98-CV-1039, United States District Court, Northern District of New York, 2001.
- Allocation Mediation at Former Wood Treating and Manufactured Gas/Coke Plant Facility, Analysis of Wood Treating and Gas/Coke Plant Operations, Expert Report, Coordination of Experts and Presentation of Allocation Position to Participants and Mediator, 2000 (confidential).
- Cost Recovery at Manufactured Gas Plant Site, NCP Consistency, Deposition Testimony, The Upjohn Company v. Consumers Power Company, Civil Action No. K88-227-CA 4, United States District Court, Western District of Michigan, Southern Division, 1990.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a copy of the foregoing was served on the following parties of record by electronic service, this 24th day of October, 2019.

/s/ Rocco D'Ascenzo

Rocco D'Ascenzo

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/24/2019 12:45:42 PM

in

Case No(s). 14-0375-GA-RDR, 15-0452-GA-RDR, 14-0376-GA-ATA, 15-0453-GA-ATA, 16-0542-GA-RD

Summary: Notice of Deposition Notice of Duke Energy Ohio, Inc. To Take Deposition Duces Tecum of James R. Campbell electronically filed by Mrs. Tammy M Meyer on behalf of Duke Energy Ohio Inc. and D'Ascenzo, Rocco and Watts, Elizabeth and Vaysman, Larisa