

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Ohio Edison	)	
Company, the Cleveland Electric	)	
Illuminating Company, and the Toledo	)	Case No. 17-974-EL-UNC
Edison Company's Compliance with	)	
R.C. 4928.17 and the Ohio Adm. Code	)	
Chapter 4901:1-37.	)	

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**NOTICE TO TAKE DEPOSITION OF OLENGER PANNELL  
AND  
REQUEST FOR PRODUCTION OF DOCUMENTS  
BY  
OFFICE OF THE OHIO CONSUMERS' COUNSEL**

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Please take note that OCC will take the deposition of Olenger Pannell, Vice President and Chief FERC Compliance Officer, relating to the FirstEnergy Utilities' corporate separation matters. OCC is scheduling that deposition for May 20, 2022 at 10:00 a.m. at OCC's office at 65 East State Street, Suite 700, Columbus, Ohio 43215. Parties are invited to attend and participate by teleconference. The depositions will continue day-to-day until completed. OCC will, by separate communication, provide details and instructions for participating in the depositions via teleconference.

Per O.A.C. 4901-1-25, the deponent is requested to produce the following documents for OCC to review, on May 17, 2022, three full days prior to the scheduled deposition. The deponent should also have these documents available for review during the deposition. The documents to be produced are as follows:

- (1) All records relating to any work he performed on corporate separation matters for the FirstEnergy Ohio Utilities during the period 2016 through 2020.
- (2) All records relating to costs paid to 501(c)(4) organizations that were charged to the FirstEnergy Ohio Utilities between January 1, 2017 through

December 31, 2019, regardless of whether the charges were later cancelled.

- (3) All records related to the cancellation of costs charged to the FirstEnergy Ohio Utilities between January 1, 2017 through December 31, 2019 relating to payments to 501(c)(4) organizations.
- (4) All records relating to costs charged to the FirstEnergy Ohio Utilities between January 1, 2017 through December 31, 2019 for employees and all outside service providers for work related to nuclear subsidy bills introduced in the Ohio Legislature during that period.
- (5) All records relating to costs charged to the FirstEnergy Ohio Utilities between July 1, 2019 through March 31, 2020 for payments to 501(c)(4) organizations and costs for employees and all outside service providers for work related to defeating the H.B. 6 referendum.
- (6) All records relating to charitable contributions made by the FirstEnergy Foundation as an inducement for witnesses to testify in support of nuclear subsidy bills introduced in the Ohio Legislature during the period January 1, 2017 through December 31, 2019.

Respectfully submitted,

Bruce Weston (0016973)  
Ohio Consumers' Counsel

/s/ Maureen R. Willis  
Maureen R. Willis (0020847)  
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## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Notice to Take Deposition of Olenger Pannell and Request for Production of Documents was provided electronically to the persons listed below this 15<sup>th</sup> day of April 2022.

/s/ Maureen R. Willis  
Assistant Consumers' Counsel

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

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**in**

**Case No(s). 17-0974-EL-UNC**

Summary: Notice of Deposition Notice to Take Deposition of Olenger Pannell and Request for Production of Documents by Office of the Ohio Consumers' Counsel electronically filed by Ms. Alana M. Noward on behalf of Willis, Maureen R.