**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

**NOTICE TO TAKE DEPOSITION**

**AND REQUEST FOR PRODUCTION OF DOCUMENTS**

**BY**

**THE OFFICE OF THE OHIO CONSUMERS’ COUNSEL**

Please take notice that the Office of the Ohio Consumers’ Counsel (“OCC”) will take the oral deposition of Kira Jordan under Ohio Adm. Code Rule 4901-1-21. OCC seeks to conduct the deposition of this individual upon oral examination on October 1, 2019 at 10:30 a.m. Eastern Time, or a date and time that is mutually agreeable between the parties and the deponent, and to continue day-to-day thereafter until complete. The deposition will take place telephonically, with the deponent present at a location mutually agreeable to the parties. The deponent will appear at the agreed upon place at the designated time and date and remain present until deposed.

The deposition will be taken of the aforementioned deponent on relevant topics within the scope of these proceedings, including but not limited to (i) the deponent’s knowledge and expertise with the subject matter of these proceedings, (ii) the deponent’s knowledge and expertise regarding the PUCO Staff’s investigation which resulted in the Staff Report filed in this case on May 3, 2019 and corrected Staff Report filed on May 29, 2019, (iii) the deponent’s knowledge regarding Verde’s responses to discovery requests related to this proceeding, and (iv) the deponent’s knowledge regarding the

Stipulation and Recommendation filed in this case on September 6, 2019. The deposition 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), the deponent is requested to produce, at least 48 hours prior to her deposition, the following documents:

1. A copy of the deponent’s resume and/or C.V.
2. To the extent not already produced to OCC through prior discovery requests, a copy of all responses to all discovery requests, requests for production, requests for information, document requests, or any other written communications between Verde and the PUCO Staff in which the deponent was involved, including, but not limited to (i) communications in which the deponent was the sender, recipient, CC’d, BCC’d, or received the communication by forward (ii) any such requests for which the deponent provided information that was sent to the PUCO Staff, even if she was not specifically included on the communication as a sender, recipient, CC’d, or BCC’d, and (iii) any such request for which the deponent was identified as the person responsible for Verde’s response to a request from the PUCO Staff.

Respectfully submitted,

Bruce Weston (0016973)

Ohio Consumers’ Counsel

*/s/ Angela D. O’Brien*

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*Outside Counsel for*

*The Office of the Ohio Consumers’ Counsel*

**CERTIFICATE OF SERVICE**

It is hereby certified that a true copy of the foregoing Notice to Take Deposition was served by electronic transmission upon the parties below this 23rd 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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