**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

|  |  |  |
| --- | --- | --- |
| In the Matter of the Application of Aqua Ohio, Inc. to Increase its Rates and Charges for Its Waterworks Service.In the Matter of the Application ofAqua Ohio Wastewater, Inc. to Increaseits Rates and Charges for WastewaterService. | ))))))) | Case No. 22-1094-WW-AIRCase No. 22-1096-ST-AIR |

**NOTICE TO TAKE DEPOSITIONS**

**AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

**BY**

**OFFICE OF THE OHIO CONSUMERS’ COUNSEL**

To: Nicole R. Woods

Ice Miller LLP

250 West St., Suite 700

Columbus OH 43215

Telephone: (614) 462-2319

Email: Nicole.Woods@icemiller.com

**Counsel for Aqua Ohio, Inc. and Aqua Ohio Wastewater, Inc.**

Christopher L. Miller

Ice Miller LLP

250 West St., Suite 700

Columbus OH 43215

Telephone (614) 462-5033

Fax: (614) 224-3886

Email: Christopher.Miller@icemiller.com

**Counsel for Aqua Ohio, Inc. and Aqua Ohio Wastewater, Inc.**

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 beginning on August 28, 2023 at 10:00 a.m. Eastern Time, or at a date and time as mutually agreed upon by OCC and Aqua Ohio, Inc. and Aqua Wastewater, Inc. (“Aqua” or “Companies”):

1. Robert L. Davis, President of Aqua Ohio, Inc. and Aqua Wastewater, Inc.
2. Bradley H. Shaw, State Controller with Aqua Ohio, Inc. and Aqua Wastewater, Inc.
3. Nicholas Sanford, Engineering Manager for Aqua Ohio, Inc.
4. Dylan W. D’Ascendis, Partner at Scott Madden, Inc.
5. Constance E. Heppenstall, Senior Project Manager at Gannet Fleming Valuation and Rate Consultants.
6. Daniel T. Franceski, independent consultant.

The depositions will take place through a Zoom or Microsoft Teams conference or by telephone, as mutually agreeable to OCC and the Companies. The deponents will appear at the agreed upon time and date and remain available until the deposition is completed.

The depositions will be taken of the aforementioned deponents on relevant topics within the scope of these proceedings, including deponents’ testimony filed on behalf of Aqua in 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 two hours prior to the deposition and to bring copies to the telephonic deposition, 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 the sub-paragraphs above.

3. All discovery responses that deponent developed, answered, or provided input regarding.

Respectfully submitted,

Bruce Weston (0016973)

Ohio Consumers’ Counsel

*/s/ Angela D. O’Brien*

Angela D. O’Brien (0097579)

Counsel of Record

Deputy Consumers’ Counsel

Connor Semple (0101102)

Donald J. Kral (0042091)

Assistant Consumers Counsel

**Office of the Ohio Consumers’ Counsel**

65 East State Street, Suite 700

Columbus, Ohio 43215

Telephone [O’Brien] (614) 466-9531

Telephone [Semple] (614) 466-9565

Telephone [Kral]: (614) 466-9571

angela.obrien@occ.ohio.gov

connor.semple@occ.ohio.gov

donald.kral@occ.ohio.gov

(willing to accept service by e-mail)

**CERTIFICATE OF SERVICE**

 I hereby certify that a copy of these Notice to Take Deposition and Request for Production of Documents were served on the persons stated below via electric transmission this 26th day of July 2023.

 */s/ Angela D. O’Brien*

 Angela D. O’Brien

 Deputy Consumers’ Counsel

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

**SERVICE LIST**

|  |  |
| --- | --- |
| Robert.eubanks@ohioAGO.govRhiannon.Howard@ohioAGO.govAttorney Examiners:Jay.agranoff@puco.ohio.govclint.white@puco.ohio.gov | Christopher.miller@icemiller.comNicole.woods@icemiller.com |