**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Approval of Tariff Amendments. | ))))) | Case No. 21-484-EL-ATA |

**NOTICE TO TAKE DEPOSITIONS**

**AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

**BY**

**OFFICE OF THE OHIO CONSUMERS’ COUNSEL**

To:

Brian Knipe

Supervising Counsel

FirstEnergy Corp.

76 South Main

Akron, OH 44308

Attorney for Ohio Edison Company,
The Cleveland Electric Illuminating Company
and The Toledo Edison Company

Please take notice under Ohio Adm. Code 4901-1-21(B) and 4901-1-21(F) that the Office of the Ohio Consumers’ Counsel (“OCC”) will take the oral depositions of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company (collectively, “FirstEnergy”), beginning on May 7, 2021 at 10:00 a.m. Eastern Time, or at a date and time as mutually agreed upon by OCC and FirstEnergy on the following matters:

1. FirstEnergy’s April 22, 2021 Application filed in the above-captioned case (the “Application”);
2. Exhibit C-3 Attachment 1 to the Application;
3. Each “Forecast as of April 2021” as referenced on Exhibit C-3 Attachment 1 to the Application; and
4. All “Company Records” as referenced on Exhibit C-3 Attachment 1 to the Application.

In accordance with 4901-1-21(F), FirstEnergy shall choose one or more of its officers, agents, employees, or other persons duly authorized to testify on its behalf at the depositions on the matters on which examination is requested, as listed in paragraphs a-d, above. Once FirstEnergy has chosen the deponent(s), FirstEnergy shall promptly identify each person designated to be deposed and the matters on which he or she will testify.

The depositions will take place remotely via videoconference (Zoom, Microsoft Teams, Webex or similar). The deponent(s) will appear at the designated time and remain present until deposed.

The depositions will be taken of the 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, FirstEnergy is requested to produce one full day in advance of the deposition, and within seven days of this deposition notice, the following documents:

1. A copy of Exhibit C-3 Attachment 1 to the Application in native format (Excel or otherwise) with all formulas intact;
2. A copy of all “Company Records” referenced on Exhibit C-3 Attachment 1 to the Application;
3. A copy of all documents you relied upon in preparing the Application;
4. A copy of each “Forecast as of April 2021” referenced in Exhibit C-3 Attachment 1;
5. A copy of any other documents necessary to verify the accuracy of any information found in Exhibit C-3 Attachment 1 to the Application; and
6. A resume or curriculum vitae for each FirstEnergy designated deponent.

Respectfully submitted,

 Bruce Weston (0016973)

 Ohio Consumers’ Counsel

 */s/ Christopher Healey*

 Christopher Healey (0086027)

Counsel of Record

 Angela O’Brien (0097579)

 Assistant Consumers’ Counsel

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#  Office of the Ohio Consumers’ Counsel

#  **65 East State Street, 7th Floor**

#  **Columbus, Ohio 43215**

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 (willing to accept service by e-mail)

**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 29th day of April 2021.

 */s/ Christopher Healey*

 Christopher Healey

 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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| --- | --- |
| John.jones@ohioattorneygeneral.govAttorney Examiners:Gregory.price@puco.ohio.govMegan.addison@puco.ohio.govJacqueline.st.john@puco.ohio.gov | bknipe@firstenergycorp.com |