**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| In the Matter of the Application of the Dayton Power and Light Company d/b/a AES Ohio for Approval of Its Electric Security Plan. | )  )  )  ) | Case No. 22-900-EL-SSO |

**NOTICE OF DEPOSITIONS AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

**BY**

**OFFICE OF THE OHIO CONSUMERS' COUNSEL**

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Please take notice under O.A.C. 4901-1-21(B) that the Office of the Ohio Consumers’ Counsel (“OCC”) will take the oral depositions, one after the other, of the following individuals:

1. Patrick Donlon, Director of Regulatory Accounting and Services for AES;
2. Sharon R. Schroder, Managing Director of Regulatory Affairs for AES Ohio; and
3. A person designated by AES Ohio with knowledge and expertise pertaining to the RCR deferral provision of the Settlement.

The depositions will be taken of the aforementioned deponents on relevant topics within the scope of these proceedings, including the Stipulation and Recommendation filed on April 10, 2023, deponents’ testimony filed on behalf of AES Ohio in this proceeding, and the deferrals referred to in the Reconciliation Rider described at pages 14-17 of the Stipulation and Recommendation. The depositions will be taken upon oral examination (as upon cross-examination) before an officer authorized by law to take depositions.

The depositions will begin on April 25, 2023 at 10:00 a.m. Eastern Time, or at a date and time as mutually agreed upon by OCC and AES Ohio. The depositions will take place at the office of the Office of the Ohio Consumers’ Counsel, 65 East State Street, Columbus, Ohio 43215, or through a Zoom or Microsoft Teams conference or as otherwise mutually agreed by OCC and AES Ohio. The deponents will appear at the agreed time and date and remain available until the deposition is completed.

Under O.A.C. 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. A copy of all emails sent or received by deponent during the period of June 1, 2022 through December 31, 2022 which include the term “OVEC.”
3. A copy of all emails sent or received by the Company’s Chief Financial Officer during the period of June 1, 2022 through December 31, 2022 which include the term “OVEC.”
4. All documents provided to the Company’s Board of Directors Audit Committee during the period of June 1, 2022 through December 31, 2022 which refer or relate to recording a $28.9 million reduction to this regulatory asset as a charge to Net purchased power cost in the Condensed Consolidated Statements of Operations in accordance with the provisions of ASC 980.
5. All documents provided to the Company’s Board of Directors Finance Committee during the period of June 1, 2022 through December 31, 2022 which refer or relate to recording a $28.9 million reduction to this regulatory asset as a charge to Net purchased power cost in the Condensed Consolidated Statements of Operations in accordance with the provisions of ASC 980.
6. All documents sent to or received from the Company’s independent auditor during the period of June 1, 2022 through December 31, 2022 which refer or relate to recording a $28.9 million reduction to this regulatory asset as a charge to Net purchased power cost in the Condensed Consolidated Statements of Operations in accordance with the provisions of ASC 980.

Respectfully submitted,

Bruce Weston (0016973)

Consumers’ Counsel

*/s/ Maureen R. Willis*

Maureen R. Willis (0020847)

Legal Director

Counsel of Record

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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 of Depositions and Requests for Production of Documents was served upon the persons listed below by electronic transmission this 17th day of April 2023.

*/s/ Maureen R. Willis*

Maureen R. Willis

Legal Director

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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