

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of Citizens)
Against Clear Cutting, Et Al.,)
)
Complainants,)
v.) Case No. 17-2344-EL-CSS
)
Duke Energy Ohio, Inc.,)
)
Respondent.)

**NOTICE OF DUKE ENERGY OHIO, INC.,
TO TAKE DEPOSITION *DUCES TECUM* OF
JAMES WILLIAMS**

Pursuant to Ohio Admin. Code Rule 4901-1-21(B), please take notice that Duke Energy Ohio, Inc., (Duke Energy) will take the oral deposition of James Williams (Mr. Williams) and all witnesses whom Mr. Williams intends to rely upon at hearing and any persons on whom Mr. Williams relied upon in forming his opinion in the above captioned matter, on Thursday, November 1 at 2:00 P.M. at the Office of the Ohio Consumer’s Counsel, 65 East State Street, 7th Floor, Columbus, Ohio 43215.

The depositions will be taken upon oral examination (as if on cross-examination) before an officer authorized by law to take depositions.

Pursuant to Ohio Admin. Code 4901-1-21(E) and 4901-1-20, all witnesses are requested to produce at the time of their deposition true and accurate copies of the documents identified in Exhibit A.

Parties are invited to attend and to cross-examine.

Respectfully submitted,

/s/ Elizabeth H. Watts

Rocco O. D'Ascenzo (0077651)

Deputy General Counsel

Elizabeth H. Watts (0031092)

Associate General Counsel

Jeanne W. Kingery (0012172)

Associate General Counsel

DUKE ENERGY OHIO, INC.

139 East Fourth Street

1303-Main

P.O. Box 960

Cincinnati, Ohio 45202

Telephone: (513) 287-4320

Rocco.D'Ascenzo@duke-energy.com

Elizabeth.Watts@duke-energy.com

Jeanne.Kingery@duke-energy.com

Robert A. McMahon (0064319)

Eberly McMahon Copetas LLC

2321 Kemper Lane, Suite 100

Cincinnati, Ohio 45206

(513) 533-3441 (telephone)

(513) 533-3554 (fax)

bcmahon@emclawyers.com

Attorneys for Duke Energy Ohio, Inc.

EXHIBIT A

Duke Energy Ohio hereby requests that, at the time and place set forth above in the notice of deposition, *duces tecum*, each deponent produce true and accurate copies of the following documents:

1. Any and all documents that were reviewed by said deponent for purposes of preparing direct testimony relative to the above-captioned proceeding.
2. Any and all documents created or authored by said deponent for purposes of preparing direct testimony relative to the above-captioned proceeding.
3. Any and all documents referenced in the witness's direct testimony relative to the above-captioned proceeding.
4. Any and all documents reviewed by said deponent in preparing, or otherwise assisting in the preparation of, discovery responses submitted by Mr. Williams relative to the above-captioned proceeding
5. Any and all documents prepared by said deponent for purposes of preparing, or otherwise assisting in the preparation of, discovery responses submitted by Mr. Williams relative to the above-captioned proceeding.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a copy of the foregoing was served on the following parties of record by electronic service, this 31st day of October, 2018.

/s/ Elizabeth H. Watts
Elizabeth H. Watts

Kimberly W. Bojko
Stephen E. Dutton
Brian W. Dressel
Carpenter Lipps & Leland LLP
280 Plaza, Suite 1300
280 North High Street
Columbus, OH 43215
bojko@carpenterlipps.com
Dutton@carpenterlipps.com
dressel@carpenterlipps.com

Counsel for Complainants

Terry Etter
Office of the Ohio Consumers' Counsel
65 East State Street
7th Floor
Columbus, Ohio 43215
Terry.etter@occ.ohio.gov

Counsel for the Ohio Consumers' Counsel