

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton Power and Light Company to Increase Its Rates for Electric Distribution.)))	Case No. 20-1651-EL-AIR
In the Matter of the Application of The Dayton Power and Light Company for Accounting Authority.))	Case No. 20-1652-EL-AAM
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised tariffs.)))	Case No. 20-1653-EL-ATA

**NOTICE OF DEPOSITIONS OF INTERSTATE GAS SUPPLY, INC.
TO THE DAYTON POWER AND LIGHT COMPANY D/B/A AES OHIO**

Pursuant to Ohio Adm.Code 4901-1-21, please take notice that Interstate Gas Supply, Inc. (“IGS Energy”) is requesting the opportunity to depose select witnesses presented by The Dayton Power and Light Company (“AES Ohio”). Specifically, IGS Energy is requesting the opportunity to depose Bruce Chapman, Chad Riethmiller, Craig Forestal, Patrick Donlon, Tyler Teuscher, and any witness with direct knowledge of issues relevant to the position of IGS Energy in these proceedings for whom testimony has been filed in the above captioned proceedings on behalf of AES Ohio.

IGS Energy seeks to conduct the depositions upon oral examination. The deposition will commence on September 24, 2021, or at a time and in a manner mutually agreed upon by the parties and will continue until they are completed. The depositions will occur in-person or via video conference through Microsoft Teams. Prior to the deposition, IGS Energy will provide further instructions to the parties on how to participate.

The deposition will be taken of the aforementioned deponents on relevant topics

within the scope of the proceeding, including but not limited to, the subject matter of the deponent's testimony and the deponent's knowledge and expertise with the subject matter of these proceedings. The deposition will be taken upon oral examination (as upon cross-examination) before an officer authorized by law to take depositions.

Pursuant to Ohio Adm. Code 4901-1-21(E) and 4901-1-20, the deponents are requested to produce, two hours prior to the deposition, all documents relating to the deponent's responsibilities with respect to the above-captioned proceedings and responses to discovery that were authored by the deponent or were provided to IGS Energy with input from the deponent. Additionally, the deponents shall bring documents, including, but not limited to, the results of any studies done for these proceedings and any backup documents, including raw data for such studies, any documents relied upon or cited in the pre-filed testimony, and any workpapers that support the pre-filed testimony.

Respectfully Submitted,

Bethany Allen (0093732)

Counsel of Record

bethany.allen@igs.com

Joseph Olikier (0086088)

joe.oliker@igs.com

Michael Nugent (0090408)

michael.nugent@igs.com

Evan Betterton (0100098)

Evan.betterton@igs.com

IGS Energy

6100 Emerald Parkway

Dublin, Ohio 43016

Telephone: (614) 659-5000

Attorneys for IGS Energy

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing *Notice of Deposition of Interstate Gas Supply, Inc. to The Dayton Power and Light Company* was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on August 25, 2021. The Commission's e-filing system will electronically serve notice of the filing of this document upon the following parties listed below.

/s/ Evan Betterton

Evan Betterton

Jodi Bair
Kyle Kern
Office of Ohio Attorney General
30 East Broad Street, 16th Floor
Columbus, OH 43215
jodi.bair@ohioAGO.gov
kyle.kem@ohioAGO.gov

Counsel for Staff of the Commission

Kimberly W. Bojko
Jonathan Wygonski
Carpenter Lipps & Leland LLP
280 North High Street, Suite 1300
Columbus, OH 43215
bojko@carpenterlipps.com
vvygonski@carpenterlipps.com

Counsel for The Ohio Manufacturers' Association Energy Group

Christopher Healey
Ambrosia E. Wilson
John Finnigan
The Office of the Ohio Consumers' Counsel
65 East State Street, 7th Floor
Columbus, OH 43215
christopher.healey@occ.ohio.gov
ambrosia.wilson@occ.ohio.gov
john.finnigan@occ.ohio.gov

Counsel for The Office of the Ohio Consumers' Counsel

Michael L. Kurtz
Kurt J. Boehm
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
Mkurtz@BKLawfirm.com
Kboehm@BKLawfirm.com
Jkylercohn@BKLawfirm.com

Counsel for Ohio Energy Group

Angela Paul Whitfield
Carpenter Lipps & Leland LLP
280 North High Street, Suite 1300
Columbus, OH 43215
paul@carpenterlipps.com

Counsel for The Kroger Company

Stephanie M. Chmiel
Kevin D. Oles
Thompson Hine LLP
41 South High Street, Suite 1700
Columbus, OH 43215
Stephanie.Chmiel@ThompsonHine.com
Kevin.Oles@ThompsonHine.com

Counsel for the University of Dayton

Matthew R. Pritchard
Rebekah J. Glover
Bryce A. McKenney
MCNEES WALLACE & NURICK LLC
21 East State Street, 17th Floor
Columbus, OH 43215
mpritchard@mcneeslaw.com
rglover@mcneeslaw.com
bmckenney@mcneeslaw.com

Counsel for Industrial Energy Users-Ohio

Robert Dove
KEGLER BROWN HILL +
RITTER CO., L.P.A.
65 East State Street, Suite 1800
Columbus, OH 43215-4295
rdove@keglerbrown.com

Counsel for Ohio Partners for Affordable Energy

Carrie H. Grundmann
SPILMAN THOMAS & BATTLE, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103
cgrundmann@spilmanlaw.com

Derrick Price Williamson
SPILMAN THOMAS & BATTLE, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com

Counsel for Walmart Inc.

Mark A. Whitt
Lucas A. Fykes
WHITT STURTEVANT LLP
The KeyBank Building
88 East Broad Street, Suite 1590
Columbus, OH 43215
whitt@whitt-sturtevant.com
fykes@whitt-sturtevant.com

Counsel for Direct Energy Business LLC and Direct Energy Services, LLC

Miranda Leppla
1145 Chesapeake Avenue, Suite I
Columbus, OH 43212-3449
mleppla@theoec.org

Counsel for Environmental Law & Policy Center

Devin D. Parram
Rachael N. Mains
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
dparram@bricker.com
rmains@bricker.com

Counsel for The Ohio Hospital Association

Drew Romig
ARMADA POWER, LLC
230 West Street, Suite 150
Columbus, OH 43215
dromig@nationwideenergypartners.com

Counsel for Nationwide Energy Partners, LLC

Christina Wieg
FROST BROWN TODD LLC
10 West Broad Street, Suite 2300
Columbus, OH 43215
cwieg@fbtlaw.com

Darren A. Craig (Pending Pro Hac Vice)
Robert L. Hartley (Pending Pro Hac Vice)
FROST BROWN TODD LLC
201 North Illinois Street, Suite 1900
P.O. Box 44961
Indianapolis, IN 46204
dcraig@fbtlaw.com
rhartley@fbtlaw.com

**Counsel for Nationwide Energy Partners,
LLC**

Kara Herrnstein
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
kherrnstein@bricker.com

Counsel for ChargePoint, Inc.

Trevor Alexander
Kari Heymeyer
Sarah Siewe
BENESCH FRIEDLANDER COPLAN &
ARONOFF
41 South High Street, Suite 2600
Columbus, Ohio 43215
talexander@beneschlaw.com
kheymeyer@beneschlaw.com
ssiewe@beneschlaw.com

Counsel for the city of Dayton

Matthew W. Warnock
Dylan F. Borchers
BRICKER & ECKLER LLP
100 South Third Street
Columbus, OH 43215-4291
mwarnock@bricker.com
dborchers@bricker.com

Marion H. Little, Jr.
Christopher J. Hogan
ZEIGER, TIGGES & LITTLE LLP
41 South High Street
3500 Huntington Center
Columbus, OH 43215
little@litohio.com
hogan@litohio.com

Katie Johnson Treadway
James Dunn
ONE ENERGY ENTERPRISES LLC
Findlay, OH 45840
ktreadway@oneenergyllc.com
jdunn@oneenergyllc.com

**Counsel for One Energy Enterprises,
LLC**

Michael J. Schuler
The Dayton Power and Light Company
1065 Woodman Drive
Dayton, OH 45432
michael.schuler@aes.com

Jeffrey S. Sharkey
Jeffrey Ireland
Christopher C. Hollon
FARUKI PLL
110 North Main Street, Suite 1600
Dayton, OH 45402
jsharkey@ficlaw.com
djireland@ficlaw.com
chollon@ficlaw.com

**Counsel for The Dayton Power and Light
Company (“AES Ohio”)**

