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**BEFORE**  
**THE PUBLIC UTILITIES COMMISSION OF OHIO**

RECEIVED-DOCKETING DIV  
2008 JUN 11 PM 3: 33

In the Matter of the Application of Ohio )  
American Water Company For Authority )  
to Increase its Rates and Charges. )

Case No. 07-1112-WW-AIR **PUCO**

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**NOTICE TO TAKE DEPOSITION UPON ORAL EXAMINATION  
AND REQUEST FOR PRODUCTION OF DOCUMENTS**

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To: Sally Bloomfield  
Thomas J. O'Brien  
Bricker & Eckler LLP  
100 South Third Street  
Columbus, OH 43215-4291

Pursuant to Ohio Adm. Code Section 4901-1-21(B), please take notice that the  
Ohio Consumers' Counsel will take the oral deposition of:

- (1) David K. Little, President of Ohio American Water Company
- (2) Edward J. Grubb, Manager, Rates and Regulation for American Water Works Service Company, Inc.
- (3) Gary M. Verdouw, Senior Financial Analyst in Rates & Regulations for American Water Works Service Company
- (4) Peter J. Thakadiyil, Financial Analyst in Rates & Regulation for American Water Works Service Company
- (5) Thomas T. Schwing, Network Operations Superintendent for Franklin County District of Ohio American Water
- (6) Paul R. Herbert, President of the Valuation and Rate Division of Gannett Fleming, Inc.
- (7) Patrick J. Baryenbruch, President of Baryenbruch & Company, LLC
- (8) All persons who will be called to present testimony, including direct, rebuttal, surrebutal, and any other form of testimony in this proceeding by Ohio American Water Company.

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- (9) A person(s) responsible for answering OCC's interrogatories, OCC's requests for production of documents and OCC's requests for admissions served upon Ohio American Water Company on or after January 1, 2008 and a person(s) who can explain all the information produced by Ohio American Water Company in response to the discovery requests in the above-captioned proceedings.

OCC seeks to conduct the deposition upon oral examination at the offices of the OCC, 10 W. Broad St., 18<sup>th</sup> Floor, Columbus, Ohio, at 10:00 a. m. beginning on July 22, 2008, or such other time that is mutually agreed upon by the parties. Areas of inquiry at the depositions will be limited to facts and data known or opinions held by the above deponents that are relevant to the application before the Commission.

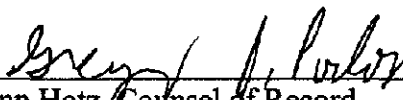
These depositions will be taken upon oral examination (as upon cross-examination) before an officer authorized by law to take depositions and will continue from day to day, except for holidays and weekends, until completed.

Pursuant to Ohio Adm. Code Sections 4901-1-21(E) and 4901-1-20, the deponents are requested to produce one full day prior to the commencement of the first scheduled deposition:

1. All documents relating to their testimony in these proceedings and upon which they relied for preparation of their testimony (including for facts and opinions); and
2. Also produce all documents containing information relied upon for responses to discovery, including any backup documentation or raw data relied upon for responses to discovery.

Respectfully submitted,

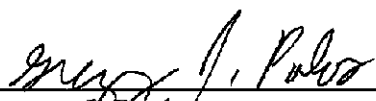
JANINE MIGDEN-OSTRANDER  
CONSUMERS' COUNSEL

  
\_\_\_\_\_  
Ann Hotz, Counsel of Record  
Gregory J. Poulos  
Assistant Consumers' Counsel

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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of this Notice to Take Deposition Upon Oral Examination and Request for Production of Documents was served by first-class U.S. Mail to the parties of record identified below, on this 11th day of June, 2008.

  
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Gregory J. Poulos  
Assistant Consumers' Counsel

**SERVICE LIST**

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