## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio	)	
Power Company to Update its	)	Case No. 13-1406-EL-RDR
Transmission Cost Recovery Rider Rates.	)	

## NOTICE TO TAKE DEPOSITIONS AND REQUEST FOR PRODUCTION OF DOCUMENTS BY THE OFFICE OF THE OHIO CONSUMERS' COUNSEL

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

- (1) Eric J. Gleckler, American Electric Power Service Corporation, Manager -- Regulated RTO Market Settlements.
- (2) Andrea E. Moore, Ohio Power Company, Manager Regulated Pricing and Analysis

OCC, 10 W. Broad St., 18<sup>th</sup> Floor, Columbus, Ohio. Mr. Gleckler's deposition will be held at 2:00 p.m. on Wednesday, October 16, 2013, or such other time that is mutually agreed upon by the Parties. Ms. Moore's deposition will be held on Tuesday, October 22, 2013 at 2:00 p.m. The depositions will continue from day to day, except for holidays and weekends, until completed. Each deponent will appear at the OCC at the designated time and date with all requested documents (identified below) and remain present until deposed.

The depositions will be taken of the aforementioned deponents on relevant topics within the scope of this proceeding. These depositions will be taken upon oral

examination (as upon cross-examination) before an officer authorized by law to take depositions.

Pursuant to Ohio Adm. Code Rules 4901-1-21(E) and 4901-1-20, deponents are requested to produce, no later than two hours prior to the taking of her/his deposition all written communications, not privileged, with any person pertaining to the PJM reactive supply charges that had been omitted from the Company's TCRR charges for the period July 2011 through March 2013 which led to the understatement of such charges in Ohio Power Company's TCRR filing for the May 2011 through April 2012 TCRR reconciliation period.

Respectfully submitted,

BRUCE J. WESTON OHIO CONSUMERS' COUNSEL

<u>/s/ Edmund "Tad" Berger</u>

Tad Berger Assistant Consumers' Counsel

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## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *Notice to Take Depositions and Request for Production of Documents* was served on the persons listed below via electronic mail this 11<sup>th</sup> day of October, 2013.

/s/ Edmund "Tad" Berger

Tad Berger Assistant Consumers' Counsel

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Case No(s). 13-1406-EL-RDR

Summary: Notice of Deposition Notice to Take Depositions and Request for Production of Documents by the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Berger, Tad Mr.