

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
The Dayton Power and Light Company)	Case No. 12-3062-EL-RDR
for Authority to Recover Certain Storm-)	
Related Service Restoration Costs.)	

In the Matter of the Application of)	
The Dayton Power and Light Company)	Case No. 12-3266-EL-AAM
for Approval of Certain Accounting)	
Authority.)	

**NOTICE TO TAKE DEPOSITIONS
AND REQUESTS 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) All persons who will be called by the Dayton Power and Light Company ("DP&L") to present testimony, including direct, supplemental, rebuttal, surrebuttal, and any other form of testimony filed, or to be filed in these proceedings; and
- (2) All persons responsible for answering OCC's interrogatories and/or responding to requests for production of documents (including responses that state that no documents are responsive to a request to produce) served in these proceedings upon DP&L; and
- (3) Person(s) with knowledge of insurance policies that cover claims associated with DP&L storm damage in 2008, 2011 and/or 2012; and
- (4) Person(s) with knowledge of storm reserve accounts in regard to DP&L storm damage in 2008, 2011 and/or 2012; and
- (5) Person(s) with knowledge of mutual assistance agreements applicable to DP&L in 2008, 2011 and 2012.

OCC seeks to conduct the depositions upon oral examination at OCC's offices, 10 W. Broad St., 18th Floor, Columbus, Ohio, at 10:00 a.m. beginning on January 30, 2014, or such other time that is mutually agreed upon by the Parties. The depositions will continue, one-after-the-other, 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, 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 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, each deponent is requested to produce, two hours prior to the taking of his/her deposition, the following documents:

1. All documents relating to his or her filed testimony in this proceeding, including but not limited to workpapers; and
2. All responses to discovery requests including, any backup documentation and/or raw data; and
3. The results of any studies or analysis conducted for this proceeding.
4. All policies regarding employee pay, including overtime and incentive pay during storm restoration efforts for 2008, 2011 and 2012.
5. All insurance policies that cover claims associated with DP&L storm damage in 2008, 2011 and/or 2012.

Respectfully submitted,

BRUCE J. WESTON
OHIO CONSUMERS' COUNSEL

/s/ *Melissa R. Yost*

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Notice was served on the persons stated below
via electronic transmission this 23rd day of January 2014.

/s/ Melissa R. Yost

Melissa R. Yost

Deputy Consumers' Counsel

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Case No(s). 12-3062-EL-RDR, 12-3266-EL-AAM

Summary: Notice of Deposition Notice to Take Depositions and Requests for Production of Documents by the Office of the Ohio Consumers' Counsel electronically filed by Patti Mallarnee on behalf of Yost, Melissa Ms.