

**BEFORE
THE OHIO POWER SITING BOARD**

In the Matter of the Application of NRG Ohio)	
Pipeline Company LLC, for a Letter of)	
Notification to Construct, Own, and Operate)	Case No. 14-1717-GA-BLN
a Natural Gas Pipeline to be Located in Lorain)	
County, Ohio)	

**NOTICE OF DEPOSITIONS DUCES TECUM
BY
LORAIN COUNTY PROPERTY OWNERS**

PLEASE TAKE NOTICE that the Lorain County Property Owners (“Property Owners”) ¹, pursuant to Ohio Adm. Code 4906-7-07(E)(2) will take the oral depositions of the following individuals, for whom testimony is filed in the above-captioned matter, at the offices of Goldman & Braunstein, LLP, **500 South Front Street, Suite 1200**, on **Wednesday, April 15, 2015**, beginning at **11:00 a.m. EST**, and will continue thereafter until completed.

1. Alan Sawyer, NRG Energy, Inc.
2. Salvatore Caiazzo, Hanover Engineering Associates, Inc.
3. Donell Murphy, Environmental Resources Management

¹ The Lorain County Property Owners are: Lawrence R. Plas; Mary B. Miller; Richard & Carol Petersen; Richard & Ellen Braatz; Thomas & Johanna Julius; Louis & Gale Betzel; Fathers of St. Joseph Church; Samuel Dennis; Matthias & Joanne Helfrich; Mark & Darlene Julius; Marty & Irene Kaulins; Robert & Debra Kubasak; Edward Kurianowicz; George Mekker; Irene Noster; Parker Holdings, Ltd.; Brandon & Mary Thorne; Stephanie Unger; Sherly Vajda; Joan Kerecz; Albert Kelling; William & Anna Marie Holt; Teresa Wukie; Avon Development, LLC; and K. Hovnanian Oster Homes, LLC.

Respectfully submitted,

/s/ Michael Braunstein

GOLDMAN & BRAUNSTEIN, LLP

Michael Braunstein (0060898)

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Attorneys for Lorain County Property Owners

DUCES TECUM

TO: Alan Sawyer
NRG Energy, Inc.
211 Carnegie Center
Princeton, NJ 08540

You are hereby commanded to produce the following documents for inspection and copying no later than **Monday, April 13, 2015**:

- (1) All documents and things related to the evaluation of alternate routes for the proposed NRG pipeline in Lorain County, Ohio ("Pipeline");
- (2) All documents and things related to the evaluation of the proposed route on the properties of the Property Owner Intervenor in the above-captioned matter;
- (3) Easement documents, including all easement terms NRG Ohio Pipeline LLC proposes to include in the easement agreements that will convey to NRG, as grantee, the right-of-way for the Pipeline; and

- (4) Surveyed, graphical depictions of the temporary and permanent easement areas, including all above and below ground appurtenances, for each of the Property Owner Intervenors' affected properties.

Requested By: /s/ Michael Braunstein
Michael Braunstein (0060898)
(614) 229-4512
Attorney for Lorain County Property Owners

TO: Salvatore Caiazzo
Hanover Engineering Associates, Inc.
252 Brodhead Road
Bethlehem, PA 18017

You are hereby commanded to produce the following documents for inspection and copying no later than **Monday, April 13, 2015**:

- (1) All documents and things related to the evaluation of alternate routes for the proposed NRG pipeline in Lorain County, Ohio ("Pipeline");
- (2) All documents and things related to the evaluation of the proposed route on the properties of the Property Owner Intervenors in the above-captioned matter; and
- (3) Surveyed, graphical depictions of the temporary and permanent easement areas, including all above and below ground appurtenances, for each of the Property Owner Intervenors' affected properties.

Requested By: /s/ Michael Braunstein
Michael Braunstein (0060898)
(614) 229-4512
Attorney for Lorain County Property Owners

TO: Donell Murphy
Environmental Resources Management
1701 Golf Road, Suite 1-700
Rolling Meadows, IL 60008

You are hereby commanded to produce the following documents for inspection
and copying no later than **Monday, April 13, 2015:**

- (4) All documents and things related to the evaluation of alternate routes for the proposed NRG pipeline in Lorain County, Ohio ("Pipeline");
- (5) All documents and things related to the evaluation of the proposed route on the properties of the Property Owner Intervenor in the above-captioned matter; and
- (6) Surveyed, graphical depictions of the temporary and permanent easement areas, including all above and below ground appurtenances, for each of the Property Owner Intervenor's affected properties.

Requested By: /s/ Michael Braunstein
Michael Braunstein (0060898)
(614) 229-4512
Attorney for Lorain County Property Owners

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing has been filed with the Public Utilities Commission of Ohio and has been served upon the following parties via electronic mail this 8th day of April, 2015.

/s/ Michael Braunstein

Michael Braunstein (0060898)

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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

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in

Case No(s). 14-1717-GA-BLN

Summary: Notice OF DEPOSITIONS DUCES TECUM BY LORAIN COUNTY PROPERTY OWNERS electronically filed by Mr. MICHAEL BRAUNSTEIN on behalf of Betzel, Louis & Gale and Borling, Charles & David and Braatz, Richard & Ellen and Carter, Edmund & Angie and Conlin, Gary & Kathleen and Julius, Thomas & Johanna and Dennis, Samuel and K. Hovnanian Oster Homes LLC and Kurianowicz, Edward and Llado, Carlos & Sonia and Miller, Mary B. and Parker, Wesley A. and Petersen, Richard & Carol and Plas, James A. and Plas, Lawrence R. and Fathers of St. Joseph and Thorne, Brandon & Mary and Unger, Stephanie K. and Vajda, Sheryl L. and Demaline, Thomas and Barbara and Holt, William and Anna and Julius, Mark and Darlene and Kaulins, Marty & Irene and Kelling, Albert and Kerecz, Joan and Kubasak, Robert & Debra and Mekker, George and Oster, Thomas and Wukie, Theresa and Helfrich, Matthias & Joanne