

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of Orwell	)	
Natural Gas Company,	)	
	)	Case No.: 14-1654-GA-CSS
Complainant,	)	
vs.	)	
	)	
Orwell-Trumbull Pipeline Company,	)	
LLC,	)	
	)	
Respondent.	)	

In the Matter of the Complaint of Orwell	)	
Natural Gas Company,	)	
	)	Case No.: 15-637-GA-CSS
Complainant,	)	
vs.	)	
	)	
Orwell-Trumbull Pipeline Company,	)	
LLC,	)	
	)	
Respondent.	)	

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**JOINT NOTICE OF VIDEOTAPED DEPOSITION *DUCES TECUM*  
OF RICHARD M. OSBORNE**

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Pursuant to Ohio Adm. Code Rule 4901-1-21(B), Respondent Orwell-Trumbull Pipeline Company, LLC will take notice that Complainant Orwell Natural Gas Company and Intervenor, Ohio Consumers' Council, will take the deposition of Richard M. Osborne. The deposition will commence on Tuesday, September 29, 2015 at 9:00 a.m. and will take place at 3511 Lost Nation Road, Willoughby, OH 44094 before a court reporter and a videographer and will be continued from

day to day until complete. Pursuant to Ohio Adm. Code Rules 4901-1-21(E) and 4901-1-20, the deponent shall bring documents, including, but not limited to:

1. Any and all documents provided to said witness in connection with his participation in the above-captioned proceedings.
2. Any and all documents reviewed by said witness in preparing, or otherwise relative to the above-captioned proceedings.
3. Any and all documents reviewed by said witness in preparing, or otherwise assisting in the preparation of, discovery responses submitted by OCC relative to the above-captioned proceedings.
4. Any and all documents prepared by said witness for purposes of preparing, or otherwise assisting in the preparation of, discovery responses submitted by OCC relative to the above-captioned proceedings.
5. Any and all documents related to and or supporting the claim that Orwell Natural Gas Company owes Orwell Trumbull Pipeline/Great Plains \$2,670,130.73 as set forth in the invoices at issue in Case No. 14-1654-GA-CSS.
6. Any and all documents related to the July 8, 2008 Natural Gas Transportation Service Agreement between Orwell Trumbull Pipeline and Orwell Natural Gas Company that is at issue in Case No. 15-537-GA-CSS.

Respectfully submitted,

/s/Gina M. Piacentino

Gina M. Piacentino, Esq. (0086225)

88 East Broad Street, Suite 1560

Columbus, OH 43215

Telephone: 614-221-0800

Facsimile: 614-221-0803

Email: [gpiacentino@wp-lawgroup.com](mailto:gpiacentino@wp-lawgroup.com)  
*Counsel for Orwell Natural Gas Company*

BRUCE J. WESTON  
OHIO CONSUMERS' COUNSEL

/s/Michael J. Schuler  
Michael J. Schuler (0082390)  
\*Counsel of Record  
Ajay K Kumar (0092208)  
Assistant Consumers' Counsel

**Office of the Ohio Consumers' Counsel**  
10 W. Broad Street, Suite 1800  
Columbus Ohio 43215  
614-466-9547 (Schuler)  
(614) 466-1292 (Kumar)  
[Michael.Schuler@occ.ohio.gov](mailto:Michael.Schuler@occ.ohio.gov)  
[Ajay.kumar@occ.ohio.gov](mailto:Ajay.kumar@occ.ohio.gov)  
*Counsel for the Office of the Ohio Consumers' Council*

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was served upon the following via electronic mail this 11<sup>th</sup> day of September, 2015:

Werner Margard  
Public Utilities Section  
180 East Broad Street, 6<sup>th</sup> Floor  
Columbus, Ohio 43215  
[Werner.margard@puc.state.oh.us](mailto:Werner.margard@puc.state.oh.us)

Michael Schuler (0082390)  
10 W. Broad Street, Suite 1800  
Columbus Ohio 43215  
614-466-9565  
614-466-9547  
[Michael.Schuler@occ.ohio.gov](mailto:Michael.Schuler@occ.ohio.gov)  
*Counsel for Ohio Consumers' Council*

Michael D. Dortch (0043897)  
Richard R. Parsons (0082270)  
KRAVITZ, BROWN, & DORTCH, LLC  
65 East State Street, Suite 200  
Columbus, Ohio 43215  
[mdortch@kravitzllc.com](mailto:mdortch@kravitzllc.com)  
*Counsel for Orwell-Trumbull Pipeline, LLC*

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**9/11/2015 10:12:57 AM**

**in**

**Case No(s). 14-1654-GA-CSS**

Summary: Notice of Deposition Joint Notice of Videotaped Deposition Duces Tecum of Richard M. Osborne electronically filed by Ms. Gina M Piacentino on behalf of Orwell Natural Gas Company