BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of Orwell)	C N 14 1654 C.A. COS
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)	
1 1 77	Ś	
Respondent.)	

JOINT NOTICE OF DEPOSITION DUCES TECUM OF JESSICA CAROTHERS

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 Jessica Carothers. The deposition will commence on Monday, September 28, 2015 at 1:15 p.m. and will take place at 65 East State Street, Suite 200, Columbus, OH 43215 before a court reporter and will be continued from day to day until complete. Pursuant to Ohio Adm. Code Rules 4901-1-21(E) and 4091-1-20, 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.
- 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. 15-637-GA-CSS.

Respectfully submitted,

/s/ Gina M. Piacentino

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/s/ Devin D. Parram

Mark S. Yurick (0039176) Email: <u>myurick@taftlaw.com</u> Direct: (614) 334-7197 Devin D. Parram (0082507) Email: <u>dparram@taftlaw.com</u> Direct: (614) 334-6117 Taft, Stettinius & Hollister, LLP 65 East State Street, Suite 1000 Columbus, Ohio 43215 Telephone: (614) 221-4000 Facsimile: (614) 221-4012 **Counsel for Orwell Natural Gas Company**

/s/ Ajay Kumar

Michael J. Schuler (0082390) *Counsel of Record Telephone: 614-466-9547 Email: michael.schuler@occ.ohio.gov Ajay K Kumar (0092208) Assistant Consumers' Counsel Telephone: 614-466-1292 Email: ajay.kumar@occ.ohio.gov Office of the Ohio Consumers' Counsel 10 W. Broad Street, Suite 1800 Columbus, OH 43215 Counsel for the Office of the Ohio Consumers' Counsel

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served upon the following via electronic mail this 22nd day of September, 2015:

Werner Margard Public Utilities Section 180 East Broad Street, 6th Floor Columbus, OH 43215 werner.margard@puc.state.oh.us

Michael D. Dortch Richard R. Parsons Kravitz, Brown & Dortch, LLC 65 East State Street, Suite 200 Columbus, OH 43215 mdortch@kravitzllc.com Michael Schuler Ajay K. Kumar 10 West Broad Street, Suite 1800 Columbus, OH 43215 <u>michael.schuler@occ.ohio.gov</u> <u>ajay.kumar@occ.ohio.gov</u>

/s/ Devin D. Parram

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 14-1654-GA-CSS, 15-0637-GA-CSS

Summary: Notice of Deposition of Jessica Carothers electronically filed by Mr. Devin D. Parram on behalf of Orwell Natural Gas