BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio)	
Edison Company, The Cleveland Electric)	
Illuminating Company and The Toledo)	Case No. 14-1297-EL-SSO
Edison Company for Authority to Provide)	
for a Standard Service Offer Pursuant)	
R.C. 4928.143 in the Form of an Electric)	
Security Plan)	

NOTICE TO TAKE DEPOSITIONS OF EILEEN MIKKELSEN AND DONALD MOUL BY SIERRA CLUB

Pursuant to Ohio Adm. Code 4901-1-21(B), please take notice that Sierra Club will take the oral deposition of the following persons, for whom rebuttal testimony is filed in the above-captioned matter on behalf of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (the "Companies"):

- 1. Eileen M. Mikkelsen
- 2. Donald Moul

Sierra Club seeks to conduct the deposition by oral examination of the persons named below at the times listed, with the depositions to be conducted at FirstEnergy's offices, 76 South Main Street, Akron, Ohio, or at such other time or place that is mutually agreed upon by Sierra Club and the Companies:

- Eileen M. Mikkelsen, 9:00 a.m., October 22, 2015
- Donald Moul, 1:00 p.m., October 22, 2015

Each deposition will continue, from day to day, except for holidays and weekends, until

completed. Each deponent will appear at the offices of FirstEnergy (or other agreed-to location)

at the designated time and date with all requested documents (identified below) and remain

present until the deposition is completed. The depositions will be taken upon oral examination

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

The depositions of the deponents listed above will be taken on relevant topics related to

each witness's rebuttal testimony, including but not limited to, the deponent's knowledge and/or

expertise concerning the subject matter of these proceedings, and the subject matter of the

deponent's rebuttal testimony. The deponent shall bring documents, including, but not limited

to, rebuttal testimony filed by the deponent in this proceeding, any documents relied upon or

cited in the deponent's rebuttal testimony, and any work papers that support the deponent's

rebuttal testimony.

Date: October 20, 2015

Respectfully submitted,

/s/ Tony G. Mendoza

Tony G. Mendoza

Sierra Club

85 Second Street, Second Floor

San Francisco, CA 94105-3459

Telephone: (415) 977-5589

Fax: (415) 977-5793

Email: tony.mendoza@sierraclub.org

Richard C. Sahli (Ohio Bar #0007360)

Richard Sahli Law Office, LLC

981 Pinewood Lane

Columbus, Ohio 43230-3662

Telephone: (614) 428-6068

rsahli@columbus.rr.com

2

Shannon Fisk
Earthjustice
1617 John F. Kennedy Blvd., Suite 1675
Philadelphia, PA 19103
Telephone: (215) 717-4522
E-mail: sfisk@earthjustice.org

Michael Soules
Earthjustice
1625 Massachusetts Ave. NW, Suite 702
Washington, DC 20036
Telephone: (202) 797-5237
E-mail: msoules@earthjustice.org

Attorneys for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that on this date I served a copy of the foregoing Notice to Take Depositions of Eileen Mikkelsen and Donald Moul upon the following parties via electronic mail.

Date: October 20, 2015

s/ Tony G. Mendoza

sam@mwncmh.com

Tony G. Mendoza

PERSONS SERVED

Thomas.mcnamee@puc.state.oh.us Thomas.lindgren@puc.state.oh.us Ryan.orourke@puc.state.oh.us mkurtz@BKLlawfirm.com kboehm@BKLlawfirm.com jkylercohn@BKLlawfirm.com stnourse@aep.com mjsatterwhite@aep.com yalami@aep.com joseph.clark@directenergy.com ghull@eckertseamans.com myurick@taftlaw.com zkravitz@taftlaw.com Schmidt@sppgrp.com ricks@ohanet.org tobrien@bricker.com mkl@bbrslaw.com gas@bbrslaw.com ojk@bbrslaw.com wttpmlc@aol.com lhawrot@spilmanlaw.com dwilliamson@spilmanlaw.com Kevin.moore@occ.ohio.gov sauer@occ.state.oh.us leslie.kovacik@toledo.oh.gov jscheaf@mcdonaldhopkins.com marilyn@wflawfirm.com matt@matthewcoxlaw.com gkrassen@bricker.com dborchers@bricker.com mfleisher@elpc.org

fdarr@mwncmh.com mpritchard@mwncmh.com cmooney@ohiopartners.org joliker@igsenergy.com mswhite@igsenergy.com Bojko@carpenterlipps.com Allison@carpenterlipps.com hussey@carpenterlipps.com barthroyer@aol.com athompson@taftlaw.com Christopher.miller@icemiller.com Gregory.dunn@icemiller.com Jeremy.grayem@icemiller.com blanghenry@city.cleveland.oh.us hmadorsky@city.cleveland.oh.us kryan@city.cleveland.oh.us tdougherty@theOEC.org finnigan@edf.org meissnerjoseph@yahoo.com trhayslaw@gmail.com TODonnell@dickinsonwright.com dstinson@bricker.com drinebolt@ohiopartners.org mitch.dutton@fpl.com Ccunningham@Akronohio.Gov Jeanne.Kingery@dukeenergy.com toddm@wamenergylaw.com gthomas@gtpowergroup.com stheodore@epsa.org glpetrucci@vorys.com 4

selisar@mwncmh.com
Amy.Spiller@duke-energy.com
jeffrey.mayes@monitoringanalytics.com
mhpetricoff@vorys.com
laurac@chappelleconsulting.net
mjsettineri@vorys.com
sechler@CarpenterLipps.com
cynthia.brady@constellation.com
lael.campbell@exeloncorp.com
tony.mendoza@sierraclub.org
burkj@firstenergycorp.com
cdunn@firstenergycorp.com
jlang@calfee.com
talexander@calfee.com
dakutik@jonesday.com

gpoulos@enernoc.com david.fein@constellation.com asonderman@keglerbrown.com msoules@earthjustice.org mdortch@kravitzllc.com rparsons@kravitzllc.com ghiloni@carpenterlipps.com callwein@keglerbrown.com Ajay.kumar@occ.ohio.gov

Attorney Examiners:

Gregory.Price@puc.state.oh.us Mandy.Chiles@puc.state.oh.us Megan.Addison@puc.state.oh.us This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/20/2015 1:41:07 PM

in

Case No(s). 14-1297-EL-SSO

Summary: Notice of Deposition of Eileen Mikkelsen and Donald Moul electronically filed by Mr. Tony G. Mendoza on behalf of Sierra Club