

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application Seeking)	
Approval of Ohio Power Company's)	
Proposal to Enter into an Affiliate)	
Power Purchase Agreement for)	Case No. 14-1693-EL-RDR
Inclusion in the Power Purchase)	
Agreement Rider.)	

In the Matter of the Application of Ohio)	
Power Company for Approval of)	Case No. 14-1694-EL-AAM
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 Rule 4901-1-21(B), please take notice that the Office of the Ohio Consumers' Counsel ("OCC") will take the oral deposition of F. Stuart Bresler, III on Thursday, December 31, 2015, commencing at 1 p.m.

OCC seeks to conduct the deposition Mr. Bresler upon oral examination at OCC's office, 10 W. Broad St., 18th Floor, Columbus, Ohio, at 1:00 p.m. beginning on Thursday, December 31, 2015. These depositions will continue, 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 deponent on relevant topics within the scope of these proceedings, including but not limited to, Mr. Bresler's testimony filed on December 28, 2015 in this proceeding, Ohio Power's proposal to enter

into an affiliate power purchase agreement for inclusion in the power purchase agreement rider, the Joint Stipulation and Recommendation (“Joint Stipulation”) filed on December 15, 2015 in this case, and Ohio Power’s Application filed on October 3, 2014,. The deposition 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, F. Stuart Bresler, III is requested to produce at his deposition, all documents relating to his/her responsibilities with respect to Case Nos. 14-1693-EL-RDR and Case No. 14-1694-EL-AAM. Additionally, the deponent shall bring documents, including, but not limited to, the results of any studies or analyses done for these proceedings and any backup documents, including raw data for such studies or analyses, workpapers, and any documents relied upon or referred to when drafting his pre-filed testimony in this proceeding.

OCC recognizes that Ohio Power Company (“AEP Ohio) has filed a Notice of Deposition of F. Stuart Bresler, III that is scheduled to take place at the offices on Porter Wright Morris & Arthur, LLP, beginning at 9 a.m., on Thursday, December 31, 2015, and OCC intends to participate in these depositions. If Ohio Power’s deposition of Mr. Bresler is canceled, then OCC’s deposition of F. Stuart Bresler, III will commence at 1 p.m. on December 31, 2015 at the OCC’s office. If, however, AEP Ohio’s scheduled deposition of Mr. Bresler proceeds as scheduled at 9:00 a.m. on December 31, 2015, then OCC plans to participate and will not need to go forward with its noticed deposition.

Respectfully submitted,

BRUCE J. WESTON (Reg. No. 0016973)
CONSUMERS' COUNSEL

/s/ William J. Michael

William J. Michael (Reg. No. 0070921)
Counsel of Record
Jodi J. Bair (Reg. No. 0062921)
Kevin F. Moore (Reg. No. 0089228)
Assistant Consumers' Counsel

Office of the Ohio Consumers' Counsel

10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
Telephone [Michael]: (614) 466-1291
Telephone [Bair]: (614) 466-9559
Telephone [Moore]: (614) 466-387-2965
william.michael@occ.ohio.gov
(will accept service via email)
jodi.bair@occ.ohio.gov
(will accept service via email)
Kevin.moore@occ.ohio.gov
(will accept service via email)

Dane Stinson (Reg. No. 0019101)
Bricker and Eckler LLP
100 South Third Street
Columbus, Ohio 43215
Telephone (614) 227-4854
DStinson@bricker.com
(willing to accept email service)

**Outside Counsel for the Office of the
Ohio Consumers' Counsel**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice to Take Depositions and Requests for Production of Documents was served via electronic service upon the parties this 30th day of December, 2015.

/s/ William J. Michael

William J. Michael

Assistant Consumers' Counsel

SERVICE LIST

Steven.beeler@puc.state.oh.us
Werner.margard@puc.state.oh.us
haydenm@firstenergycorp.com
jmcdermott@firstenergycorp.com
scasto@firstenergycorp.com
jlang@calfee.com
talexander@calfee.com
myurick@taftlaw.com
callwein@keglerbrown.com
tony.mendoza@sierraclub.org
tdougherty@theOEC.org
twilliams@snhslaw.com
jeffrey.mayes@monitoringanalytics.com
ricks@ohanet.org
tobrien@bricker.com
mhpetricoff@vorys.com
mjsettineri@vorys.com
glpetrucci@vorys.com
mdortch@kravitzllc.com
joliker@igsenergy.com
sechler@carpenterlipps.com
gpoulos@enernoc.com
sfisk@earthjustice.org
Kristin.henry@sierraclub.org
chris@envlaw.com
todonnell@dickinsonwright.com
rseiler@dickinsonwright.com

stnourse@aep.com
mjsatterwhite@aep.com
msmckenzie@aep.com
dconway@porterwright.com
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkylercohn@BKLawfirm.com
sam@mwncmh.com
fdarr@mwncmh.com
mpritchard@mwncmh.com
Kurt.Helfrich@ThompsonHine.com
Scott.Campbell@ThompsonHine.com
Stephanie.Chmiel@ThompsonHine.com
lhawrot@spilmanlaw.com
dwilliamson@spilmanlaw.com
charris@spilmanlaw.com
Stephen.Chriss@walmart.com
Schmidt@sppgrp.com
Bojko@carpenterlipps.com
orourke@carpenterlipps.com
mfleisher@elpc.org
msmalz@ohiopoverlylaw.org
cmooney@ohiopartners.org
drinebolt@ohiopartners.org
ghull@eckertseamans.com
msoules@earthjustice.org
jennifer.spinosi@directenergy.com
laurie.williams@sierraclub.org
evelyn.robinson@pjm.com

Sarah.parrot@puc.state.oh.us
Greta.see@puc.state.oh.us

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

12/30/2015 5:23:32 PM

in

Case No(s). 14-1693-EL-RDR, 14-1694-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 Ms. Deb J. Bingham on behalf of Michael, William J. Mr.