BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke Energy Ohio, Inc. for Recovery of Program Costs, Lost Distribution Revenue and Performance Incentives Related to Its Energy Efficiency and Demand Response Programs.	))))))	Case No. 14-457-EL-RDR
In the Matter of the Application of Duke Energy Ohio, Inc. for Recovery of Program Costs, Lost Distribution Revenue, and Performance Incentives Relate to its Energy Efficiency and Demand Response Programs for 2014.	))))))	Case No. 15-534-EL-RDR

NOTICE TO TAKE DEPOSITIONS
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL

In accordance with Ohio Adm. Code Section 4901-1-21(B), please take notice that the Office of the Ohio Consumers' Counsel ("OCC") will take the deposition upon oral examination of any and all witnesses who are testifying on behalf of Duke Energy Ohio, Inc. regarding the Stipulation and Recommendation filed on January 6, 2016 in these proceedings. OCC will also take the deposition upon oral examination of Duke employees who are familiar with the Stipulation and Recommendation or have knowledge and expertise as to the terms of the Stipulation and Recommendation. The deposition will be conducted at OCC's offices, 10 West Broad Street, Suite 1800, Columbus, Ohio, 43215, beginning at 10:00 a.m. on February 25, 2016, or at another time and date agreed upon by OCC and Duke, and will continue from day to day, except

for holidays and weekends, until completed. The deponents will appear at the designated time and date with all requested documents (identified below) and will remain present until deposed.

The deposition will be taken of the aforementioned deponents on relevant topics within the scope of this proceeding, including but not limited to, the subject matter of the deponent's testimony and the deponent's knowledge and expertise with the subject matter of these proceedings. 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, OCC requests that each deponent produce, at least two hours prior to the taking of his/her deposition, the following documents:

1. All documents relating to, or relied upon for the preparation of, his/her filed testimony in this proceeding, including but not limited to workpapers; and

2. All documents distributed during the settlement discussions between Duke and the Staff of the Public Utilities Commission of Ohio that resulted in the Stipulation and Recommendation filed in these cases on January 6, 2016; and

3. All documents distributed during settlement discussions between Duke and any intervenor in this case that resulted in the Stipulation and Recommendation filed in these cases on January 6, 2016; and

4. All documents relied upon to draft the Stipulation and Recommendation filed in these cases on January 6, 2016; and

5. All documents supporting the terms and conditions agreed to in the Stipulation and Recommendation filed in these cases on January 6, 2016; and

6. All documents describing the impact on customers of the Stipulation and Recommendation filed in these cases on January 6, 2016; and

7. All responses to discovery requests including, any backup documentation and/or raw data; and

8. The results of any studies or analysis conducted for this proceeding.

Respectfully submitted,

BRUCE J. WESTON (0016973)
OHIO CONSUMERS' COUNSEL

/s/ Terry L. Etter
Terry L. Etter (0067445), Counsel of Record
for 14-457-EL-RDR
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for 15-534-EL-RDR
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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Notice to Take Deposition and Requests for Production of Documents was served on the persons stated below via electronic transmission this 19th day of February 2016.

/s/ Terry L. Etter
Terry L. Etter
Assistant Consumers' Counsel

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in

Case No(s). 14-0457-EL-RDR, 15-0534-EL-RDR

Summary: Notice Notice to Take Deposition and Requests for Production of Documents by the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Etter, Terry L.