

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Edison Company, The Cleveland Electric)	Case No. 14-1297-EL-SSO
Illuminating Company and The Toledo)	
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 DEPOSITION
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
BY
ENVIRONMENTAL DEFENSE FUND, ENVIRONMENTAL LAW AND POLICY
CENTER, THE OFFICE OF THE OHIO CONSUMERS' COUNSEL, OHIO
ENVIRONMENTAL COUNCIL, THE OHIO MANUFACTURERS'
ASSOCIATION ENERGY GROUP, PJM POWER PROVIDERS GROUP, AND
THE SIERRA CLUB**

Under Ohio Adm. Code Rule 4901-1-21(B), please take notice that the Intervenor listed above will take the deposition of Eileen M. Mikkelsen on Thursday, June 30, 2016, commencing at 9:00 a.m. and continuing day by day, until Intervenor has had the opportunity to cross examine Ms. Mikkelsen.

The deposition of Ms. Mikkelsen upon oral examination will take place at OCC's office, 10 W. Broad St., 18th Floor, Columbus, Ohio, at 9:00 a.m. beginning on Thursday, June 30, 2016. This deposition will continue, from day to day, except for holidays and weekends, until examination by all Intervenor is completed. Ms. Mikkelsen will appear at OCC's office at the designated time and date with all requested documents (identified below) and remain present until deposed.

The deposition will be taken of the aforementioned deponent on relevant topics within the scope of these proceedings, including but not limited to, Ms. Mikkelsen's

rehearing testimony filed on May 2, 2016, in this proceeding, on FirstEnergy Utilities' proposal for a Modified Rider RRS proposal, the Modified Rider RRS proposal, and alternatives to the Modified RRS proposal. The deposition will be taken upon oral examination (as upon cross-examination) before an officer authorized by law to take depositions.

Under Ohio Adm. Code Rules 4901-1-21(E) and 4901-1-20, Ms. Mikkelsen is requested to produce two hours prior to her deposition, all documents relied upon or referred to when drafting her pre-filed testimony in this proceeding. Additionally, the deponent shall bring documents, including, but not limited to:

1) all documents that support Ms. Mikkelsen's statement that "Effectively, Rider RRS helps ensure the continued operation of 3,200 MWs of fuel diverse baseload generation." (Rehearing Testimony at 15)

2) all documents that support Ms. Mikkelsen's statement that "Accordingly, the significant economic development and job retention benefits and transmission reliability benefits contemplated under the original proposal for the region would continue to exist, albeit for potentially different plants." (Rehearing Testimony at 15).

3) all documents pertaining to alternatives to the Modified RRS Proposal that the Utility considered after the FERC Order¹ was issued.

4) documents identifying existing corporate policies to manage cash that will be applied to cash associated with Modified Rider RRS.

¹ *EPSA v. FirstEnergy Solutions Corp.*, 155 FERC ¶612,101, FERC Docket No. EL16-34-000, Order Granting Complaint (*Apr. 27, 2016).

Respectfully submitted,

BRUCE J. WESTON (0016973)
OHIO CONSUMERS' COUNSEL

/s/ Maureen R. Willis

Larry S. Sauer, (0039223),
Counsel of Record
Maureen R. Willis (0020847)
William J. Michael (0070921)
Kevin F. Moore (0089228)
Ajay Kumar (0092208)
Assistant Consumers' Counsel

Office of the Ohio Consumers' Counsel

10 West Broad Street, Suite 1800
Columbus, Ohio 43215-3485
Telephone [Sauer]: (614) 466-1312
Telephone [Willis]: (614) 466-9567
Telephone [Michael]: (614) 466-1291
Telephone [Moore]: (614) 387-2965
Telephone [Kumar]: (614) 466-1292
larry.sauer@occ.ohio.gov
maureen.willis@occ.ohio.gov
William.michael@occ.ohio.gov
Kevin.moore@occ.ohio.gov
Ajay.kumar@occ.ohio.gov
(All attorneys will accept service via email)

/s/ Trent A. Dougherty

Trent A. Dougherty, Counsel of Record
1145 Chesapeake Ave, Suite I
Columbus, Ohio 43212-3449
(614) 487-7506 - Telephone
(614) 487-7510 - Fax
tdougherty@theoec.org
(Will accept service via email)

***Counsel for Ohio Environmental Council
and Environmental Defense Fund***

/s/ Madeline Fleisher

Madeline Fleisher
Environmental Law & Policy Center
21 W. Broad St., Ste. 500
Columbus, OH 43215
P: 614-670-5586
F: 312-795-3730
mfleisher@elpc.org
(Will accept service vial email)

***Counsel for Environmental Law & Policy
Center***

/s/ Kimberly W. Bojko

Kimberly W. Bojko (0069402)
Danielle M. Ghiloni (0085245)
Carpenter Lipps & Leland LLP
280 Plaza, Suite 1300
280 North High Street
Columbus, Ohio 43215
Telephone: (614) 365-4100
Bojko@carpenterlipps.com
Ghiloni@carpenterlipps.com
(Will accept service via email)

Counsel for OMAEG

/s/ Michael J. Settineri

Michael J. Settineri (0073369),
Counsel of Record
Gretchen L. Petrucci (0046608)
Vorys, Sater, Seymour and Pease LLP
52 E. Gay Street
P.O. Box 1008
Columbus, Ohio 43216-1008
614-464-5462
614-719-4904 (fax)
misettineri@vorvs.com
glpetrucci@vorvs.com
(Will accept service via email)

***Attorneys for the PJM Power Providers
Group***

/s/ Richard C. Sahli

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

Shannon Fisk (PHV-1321-2016)

Earthjustice

1617 John F. Kennedy Blvd., Suite 1130

Philadelphia, PA 19103

(215) 717-4522

(212) 918-1556 (fax)

sfisk@earthjustice.org

Michael C. Soules (PHV-5615-2016)

Earthjustice

1625 Massachusetts Ave. NW, Suite 702

Washington, DC 20036

(202) 797-5237

msoules@earthjustice.org

Tony G. Mendoza (PHV-5610-2016)

Sierra Club

Environmental Law Program

85 Second Street, Second Floor

San Francisco, CA 94105-3459

(415) 977-5589

tony.mendoza@sierraclub.org

(All attorneys will accept service via email)

Attorneys for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice to Take Deposition and Requests for Production of Documents was served via electronic service upon the parties this 22nd day of June 2016.

/s/ Maureen R. Willis

Maureen R. Willis

Assistant Consumers' Counsel

SERVICE LIST

mkurtz@BKLlawfirm.com

kboehm@BKLlawfirm.com

jkylercohn@BKLlawfirm.com

stnourse@aep.com

mjsatterwhite@aep.com

yalami@aep.com

czdebski@eckertseamans.com

dparram@taftlaw.com

Schmidt@sppgrp.com

ricks@ohanet.org

mkl@smxblaw.com

gas@smxblaw.com

wttpmlc@aol.com

lhawrot@spilmanlaw.com

dwilliamson@spilmanlaw.com

blanghenry@city.cleveland.oh.us

hmadorsky@city.cleveland.oh.us

kryan@city.cleveland.oh.us

mdortch@kravitzllc.com

rparsons@kravitzllc.com

gkrassen@bricker.com

dstinson@bricker.com

dborchers@bricker.com

DFolk@akronohio.gov

mkimbrough@keglerbrown.com

sechler@carpenterlipps.com

gpoulos@enernoc.com

burkj@firstenergycorp.com

cdunn@firstenergycorp.com

jlang@calfee.com

talexander@calfee.com

dakutik@jonesday.com

sam@mwncmh.com

fdarr@mwncmh.com

mpritchard@mwncmh.com

cmooney@ohiopartners.org

callwein@keglerbrown.com

joliker@igsenergy.com

mwhite@igsenergy.com

Bojko@carpenterlipps.com

ghiloni@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

jfinnigan@edf.org

Marilyn@wflawfirm.com

todonnell@dickinsonwright.com

matt@matthewcoxlaw.com

dwolff@crowell.com
rlehfeldt@crowell.com
rkelter@elpc.org
evelyn.robinson@pjm.com
mhpetricoff@vorys.com
mjsettineri@vorys.com
glpetrucci@vorys.com
mwarnock@bricker.com

mfleisher@elpc.org
drinebolt@ohiopartners.org
meissnerjoseph@yahoo.com
LeslieKovacik@toledo.oh.gov
trhayslaw@gmail.com
Jeffrey.mayes@monitoringanalytics.com
msoules@earthjustice.org
sfisk@earthjustice.org
Thomas.mcnamee@ohioattorneygeneral.gov
Thomas.lindgren@ohioattorneygeneral.gov
Steven.beeler@ohioattorneygeneral.gov

Attorney Examiners:

Gregory.price@puc.state.oh.us
Mandy.willey@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

6/22/2016 3:23:37 PM

in

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

Summary: Notice of Deposition Notice to Take Deposition and Requests for Production of Documents by Environmental Defense Fund, Environmental Law and Policy Center, the Office of the Ohio Consumers' Counsel, Ohio Environmental Council, the Ohio Manufacturers' Association Energy Group, PJM Power Providers Group and the Sierra Club electronically filed by Ms. Deb J. Bingham on behalf of Willis, Maureen R Mrs.