

**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. )

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**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**

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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., 18<sup>th</sup> 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 Order<sup>1</sup> was issued.

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

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

Respectfully submitted,

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## **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  
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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.