

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Delivery Capital            )  
Recovery Rider Contained in the Tariffs        ) Case No. 15-1739-EL-RDR  
of Ohio Edison Company, The Cleveland        )  
Electric Illuminating Company and The         )  
Toledo Edison Company.                         )

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**PUBLIC VERSION**

**MOTION TO COMPEL  
BY  
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL  
(DATED July 20, 2016)**

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BRUCE J. WESTON (0016973)  
OHIO CONSUMERS' COUNSEL

Jodi Bair, Counsel of Record  
(0062921)  
Ajay Kumar (0092208)  
Assistant Consumers' Counsel

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On October 9, 2015, the Staff of the Public Utilities Commission of Ohio (“PUCO”) opened this docket to review the Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company’s (“FirstEnergy” or “Utility”) collection of the delivery capital recovery rider (“DCR”) from customers during 2015. Blue Ridge Consulting Services, Inc. (“Blue Ridge”) was selected by the PUCO to perform an audit and investigation of FirstEnergy’s DCR.<sup>1</sup>

The auditor filed a report on April 22, 2016. This report makes recommendations regarding FirstEnergy’s \$239 million annual revenue requirement that FirstEnergy’s customers pay.<sup>2</sup>

As the statutory representative of Ohio’s residential utility consumers, OCC sought to discover documents and information from FirstEnergy regarding the investigation and audit. On March 17, 2016, OCC served discovery on FirstEnergy. On

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<sup>1</sup> Entry at 3 (Dec. 9, 2016).

<sup>2</sup> Blue Ridge Compliance Audit at 11 (April 22, 2016) and *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, In the Form of an Electric Security Plan*, Case No. 10-388-EL-SSO, (“FirstEnergy 2010 ESP Case”) Opinion and Order at 11, capped revenue to be collected at \$240 million (Aug. 25, 2010).

April 6, 2016 FirstEnergy served its responses to OCC's discovery. Its responses failed to answer any of the questions posed. The discovery and FirstEnergy's responses are attached to this pleading.<sup>3</sup> FirstEnergy later supplemented one of the four requests<sup>4</sup> for production of documents that is attached and marked as confidential. FirstEnergy apparently believes that because OCC was not a signatory party to the stipulation which set up the audit, it does not have discovery rights. FirstEnergy is wrong.

The Utility's failure to respond to OCC's requests for production of documents violates well-established discovery rules. Accordingly, under Ohio Adm. Code 4901-1-12 and 4901-1-23<sup>5</sup>, OCC moves the PUCO, the legal director, the deputy legal director, or an attorney examiner for an order compelling FirstEnergy to produce the documents OCC requested.

OCC files this Motion to Compel, with the reasons supporting this motion set forth in the attached Memorandum in Support.

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<sup>3</sup> Attachment 1.

<sup>4</sup> FirstEnergy supplemented its responses to OCC's request for production of documents OCC Set 1 RPD-4 and marked it as confidential. Confidential Attachment 2.

<sup>5</sup> See Ohio Adm. Code 4901-1-12 and 4901-1-23.

Respectfully submitted,

BRUCE J. WESTON (0016973)  
OHIO CONSUMERS' COUNSEL

*/s/ Jodi Bair*

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**MEMORANDUM IN SUPPORT**

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**I. INTRODUCTION**

Ohio Adm. Code 4901-1-23(C) details the technical requirements for a Motion to Compel, all of which are met in this OCC pleading. Those requirements include a memorandum in support, setting forth: (a) the specific basis of the motion, and citations of any authorities relied upon; (b) a brief explanation of how the information sought is relevant to the pending proceeding; and (c) the filing of an affidavit explaining how the party seeking to compel discovery has exhausted all other reasonable means of resolving the differences with the party from whom the discovery is sought.

On October 9, 2015, PUCO Staff docketed a Memorandum in this case, requesting that the PUCO open this docket.<sup>6</sup> On November 4, 2015, the PUCO issued an Entry ordering Staff to issue a request for proposal to perform an audit of FirstEnergy's DCR expenditures and revenues.<sup>7</sup> And on December 9, 2015, the PUCO selected Blue Ridge as the auditor.<sup>8</sup> The Blue Ridge audit report was docketed on April 22, 2016.

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<sup>6</sup> Memorandum at 1 (Oct. 9, 2015).

<sup>7</sup> Entry (Nov. 4, 2015).

<sup>8</sup> Entry (Dec. 9, 2015).

OCC served discovery on FirstEnergy on March 17, 2016 and the Utility provided responses to OCC on April 6, 2016 that did not provide anything but objections.<sup>9</sup> On June 24, 2016, FirstEnergy supplemented one OCC response that is marked as confidential.<sup>10</sup> The other three requests for production of documents remain unanswered by the Utility. Under the PUCO's rules, any party may move for an order compelling discovery, with respect to any failure of a party to produce a document as requested through a request for production of documents.<sup>11</sup>

OCC has detailed in the attached affidavit<sup>12</sup> the efforts counsel undertook to resolve differences with FirstEnergy, consistent with Rule 4901-1-23(C)(3). At this point, OCC has reached an impasse with the Utility that has left OCC no choice but to proceed accordingly to obtain the discovery to which it is entitled.

For the reasons explained more fully below, the PUCO should grant OCC's Motion to Compel and order FirstEnergy provide responses to OCC on an expedited basis.

## **II. SCOPE OF PARTIES' RIGHT TO DISCOVERY**

R.C. 4903.082 states that “[a]ll parties and intervenors shall be granted ample rights of discovery.” Therefore OCC, as a party in this proceeding,<sup>13</sup> is entitled to timely and complete responses to its discovery inquiries, including having properly noticed parties appear at depositions. Additionally, R.C. 4903.082 directs the PUCO to ensure

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<sup>9</sup> Attachment 1.

<sup>10</sup> Confidential Attachment 2.

<sup>11</sup> See Ohio Adm. Code 4901-1-23(A)(2) and (A)(3).

<sup>12</sup> Attachment 3.

<sup>13</sup> See Ohio Adm. Code 4901-1-16(H). OCC filed a Motion to intervene on December 17, 2015.

that parties are allowed “full and reasonable discovery” under its rules. According to the PUCO’s rules, “discovery may begin immediately after a proceeding is commenced.”<sup>14</sup> Discovery timelines may be shortened or enlarged by the PUCO upon good cause shown. OCC’s discovery was properly served and under the given time frame.

The PUCO has adopted rules that specifically define the scope of discovery.

Ohio Adm. Code 4901-1-16(B) provides:

any party to a commission proceeding may obtain discovery of any matter, not privileged, which is relevant to the subject matter of the proceeding. It is not a ground for objection that the information sought would be inadmissible at the hearing, if the information sought *appears* reasonably calculated to lead to the discovery of admissible evidence. (Emphasis added.)

The PUCO’s rule is similar to Ohio Civ. R. 26 (B)(1), which governs the scope of discovery in civil cases. Civ. R. 26(B) has been liberally construed to allow for broad discovery of any unprivileged matter relevant to the subject matter of the pending proceeding.<sup>15</sup>

This scope of discovery is applicable to requests for production of documents. Requests for Production of Documents may elicit facts, data, or other information known or readily available to the party upon whom the discovery is served, under Ohio Adm. Code §§ 4901-1-20 and 4901-1-21.

The Order that established the DCR also expressly provided that non-signatory parties to the Stipulation “will have the opportunity to fully participate in any Commission proceeding resulting from the audit process, including ample rights for

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<sup>14</sup> Ohio Adm. Code 4901-1-17 (A).

<sup>15</sup> *Ohio Consumers’ Counsel v. Pub. Util. Comm.* (2006), 111 Ohio St.3d 300, ¶83 (“*OCC v. PUC*”), citing to *Moskovitz v. Mt. Sinai Med. Ctr.* (1994), 69 Ohio St.3d 638, 661 and *Disciplinary Counsel v. O’Neill* (1996), 75 Ohio St. 3d 1479.



discovery.”<sup>16</sup> Yet, FirstEnergy has blocked any OCC participation in the audit process by refusing to provide responses to discovery. FirstEnergy should not be permitted to collect hundreds of millions of dollars annually from its customers, while providing no information or answers to questions about these expenditures.

OCC’s right to discovery is assured by law, rule, and Supreme Court precedent.<sup>17</sup> And that right to discovery was also confirmed by PUCO Order.<sup>18</sup> OCC is entitled to timely and complete responses to its discovery inquiries, including the right to request documents be produced. OCC seeks to proceed forward with its discovery and is unable to do so without the PUCO compelling the Utility to provide responsive documents and answers.

### III. ARGUMENT

#### A. **The Utility failed to respond to the most basic and rudimentary discovery that parties provide to each other in most, if not all PUCO cases – copies of Staff and other parties’ discovery requests and the Utility’s responses to those requests.**

On March 17, 2016, OCC properly and timely served discovery on the Utility. Instead of providing responses to the discovery FirstEnergy made multiple objections, such as – the request being overly broad, that OCC is not entitled to participate in the audit process, the information is confidential, and that the documents are protected under R.C. 4901.16.<sup>19</sup> These meritless objections also asserted that the discovery responses to

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<sup>16</sup> *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and the Toledo Edison Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the form of an Electric Security Plan*, Case No. 10-388-EL-SSO, Opinion and Order at 40 (Aug. 25, 2010) (“FirstEnergy 2010 ESP Order”).

<sup>17</sup> See *OCC v. PUC*, 111 Ohio St.3d at 320 (November 22, 2006).

<sup>18</sup> FirstEnergy 2010 Order.

<sup>19</sup> See OCC Attachment 1.

interrogatories are conclusions, results or recommendation formulated by the auditor and are not subject to examination by any non-signatory participant to the proceeding.

As discussed earlier, the PUCO, when authorizing the initiation of the DCR clearly asserted that non-signatory parties “will have the opportunity to fully participate in any Commission proceeding resulting from the audit process, including ample rights for discovery.”<sup>20</sup> And FirstEnergy’s answer that responses to discovery are not subject to examination by any non-signatory party denies OCC’s ample rights for discovery. OCC asks the PUCO to affirm its holding in the FirstEnergy 2010 ESP Case and require the Utility to respond to OCC’s discovery.

FirstEnergy also claims that R.C. 4901.16 forbids the production of the requested information. R.C. 4901.16 has no application to FirstEnergy. R.C. 4901.16 provides a penalty for divulging information by an employee or agent of the PUCO. Though FirstEnergy may believe that it is protected by this statute, this could not be more inaccurate. R.C. 4901.16 applies to PUCO employees or agents and, for FirstEnergy to claim that it is protected under this statute is erroneous.

OCC is attempting to discover information that is reasonably calculated to lead to the discovery of admissible evidence. FirstEnergy unilaterally decided not to answer any OCC requests for information related to its annual collection of nearly \$240 million from its customers. FirstEnergy seeks to restrict OCC's participation in this proceeding contrary to the express holdings of the PUCO allowing non-signatory parties to "fully participate in any Commission proceeding resulting from the audit process, including

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<sup>20</sup> FirstEnergy 2010 ESP Order at 40.

ample rights for discovery." This is prejudicial to OCC and the 1.9 million residential consumers of FirstEnergy that it represents.

**B. The requests for production of documents sought to discover information reasonably calculated to lead to the discovery of admissible evidence.**

As stated earlier, any party to a commission proceeding may obtain discovery of any matter, not privileged, which is relevant to the subject matter of the proceeding so long as the information sought *appears* reasonably calculated to lead to the discovery of admissible evidence. Thus, the standard for what is relevant in the context of discovery at a PUCO proceeding is very broad. Notably, it is a broader standard than the standard applied to evidence admitted at the hearing.

The requests for production of documents asked the Utility to provide copies of all documents and workpapers related to this proceeding provided to the PUCO Staff. OCC also sought copies of all discovery received by FirstEnergy from other parties and the Utility's responses to that.

FirstEnergy should not be permitted to avoid answering these basic requests that are reasonably calculated to lead to the discovery of admissible evidence. The requests are limited to this audit and relevant to the Utility's collection of the DCR rider money from its customers. The PUCO should direct FirstEnergy to provide this information to OCC. OCC's Motion to Compel should be granted.

**C. OCC undertook reasonable efforts to resolve the discovery dispute.**

As mentioned earlier, under Ohio Adm. Code 4901-1-23(C) a party shall not file a motion to compel until the party seeking discovery has exhausted all other reasonable means of resolving any differences with the party or person from whom discovery is

sought. As more fully explained in the attached affidavit, OCC and FirstEnergy attempted to resolve their discovery disputes without PUCO intervention. These attempts were unsuccessful. Therefore, OCC counsel has exhausted all other reasonable means of resolving any differences with FirstEnergy. The PUCO should grant OCC's motion. Doing so would be consistent with Ohio Supreme Court precedent which upheld the broad rights of OCC to conduct discovery.

In a 2003 Cincinnati Gas & Electric Company case, OCC sought documents, through discovery. The documents included side deals between Signatory Parties to a Stipulation and the utility that were entered into privately.<sup>21</sup> The PUCO denied OCC's Motion to Compel this discovery. OCC appealed the PUCO's decision to the Supreme Court of Ohio.<sup>22</sup> The Supreme Court of Ohio sided with OCC and decided that the PUCO erred by not granting OCC's Motion to Compel, and upheld OCC's rights to broad discovery.<sup>23</sup> This case is no different; FirstEnergy is declining to comply with OCC's reasonable request to discover essential information relevant to the subject of the proceeding. The PUCO should grant OCC's Motion to Compel.

#### **IV. CONCLUSION**

It is unjust and unreasonable to allow FirstEnergy to refuse to provide responses to OCC's discovery requests. These discovery requests are reasonably calculated to lead

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<sup>21</sup> *In the Matter of the Cincinnati Gas and Electric Company to Modify its Non-Residential Generation Rates to Provide for Market-Based Standard Service Offer Pricing*, Case No. 03-93-EL-ATA.

<sup>22</sup> *See OCC v. PUC*, 111 Ohio St. 3d at 300.

<sup>23</sup> *Id.* at 320 "The text of Ohio Adm.Code 4901-1-16(B), the commission's discovery rule, is similar to Civ.R. 26(B)(1), which governs the scope of discovery in civil cases. Civ.R. 26(B) has been liberally construed to allow for broad discovery of any unprivileged matter relevant to the subject matter of the pending proceeding...a party may obtain discovery regarding non-privileged information relevant to the claim or defense of a proceeding. This includes determining the existence of documents and the identity of persons having knowledge of any discoverable matter[.]"

to the discovery of admissible evidence. FirstEnergy's refusal to answer OCC's requests for production of documents is not well founded. The law, Supreme Court precedent, PUCO Rules, and the earlier PUCO Order confirm OCC's right to prepare for its case by engaging in ample discovery.

For the reasons set forth in OCC's Memorandum in Support, OCC respectfully requests that the PUCO grant its Motion to Compel. Further, OCC asks that this Motion be granted expedited treatment. To facilitate thorough and adequate preparation for participation in this proceeding, OCC asks the PUCO to require FirstEnergy to respond to OCC's request for production of documents within seven-days of the PUCO's order.

Respectfully submitted,

BRUCE J. WESTON (0016973)  
OHIO CONSUMERS' COUNSEL

*/s/ Jodi Bair*  
Jodi Bair, Counsel of Record  
(0062921)  
Ajay Kumar (0092208)  
Assistant Consumers' Counsel

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(will accept service via email)

**CERTIFICATE OF SERVICE**

It is hereby certified that a true copy of the foregoing Motion to Compel (Public Version) was served upon the persons listed below via electronic transmission this 20<sup>th</sup> day of July, 2016.

*/s/ Jodi Bair*  
Jodi Bair  
Assistant Consumers' Counsel

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**OCC Set 1**

Case No. 15-1739-EL-RDR  
Annual Compliance Audit of Delivery Capital Recovery Rider (DCR) of  
Ohio Edison Company, The Cleveland Electric Illuminating Company,  
and the Toledo Edison Company

REQUEST FOR PRODUCTION OF DOCUMENTS

**OCC Set 1** Please provide copies of all formal and informal requests (e.g. interrogatories, data  
– **RPD-1** requests) made to the Company by the Commission, the PUCO Staff and the PUCO's  
Attorneys General in this proceeding, and the Company's responses to those requests.

**Response:** The Companies object to this Request for Production as overly broad, irrelevant, and not likely to lead to the discovery of admissible evidence. The Companies object on the grounds that the documents sought are protected under 4901.16, Revised Code. The Companies further object that, as stated in the Companies' Memorandum Contra OCC's Motion to Intervene, the OCC is not entitled to participate in the audit process, which was specifically reserved to Signatory Parties to the Stipulation in Case No. 10-388-EL-SSO and continued in Case No. 12-1230-EL-SSO. The Companies also further object that the Commission's Entry of November 4, 2015, Par. (6), and December 9, 2015 state, "Any conclusions, results, or recommendations formulated by the auditor may be examined by any participant to this proceeding" and no such conclusions, results, or recommendations have been filed in this proceeding. Further, certain of the information requested is confidential. Subject to and without waiving the foregoing objections, not applicable.

Case No. 15-1739-EL-RDR  
Annual Compliance Audit of Delivery Capital Recovery Rider (DCR) of  
Ohio Edison Company, The Cleveland Electric Illuminating Company,  
and the Toledo Edison Company

REQUEST FOR PRODUCTION OF DOCUMENTS

**OCC Set 1** Please provide copies of all documents and workpapers provided to the Commission, the  
**- RPD-2** PUCO Staff and/or the PUCO's Attorneys General in connection with this proceeding.

**Response:** The Companies object to this Request for Production as overly broad, irrelevant, and not likely to lead to the discovery of admissible evidence. The Companies object on the grounds that the documents sought are protected under 4901.16, Revised Code. The Companies further object that, as stated in the Companies' Memorandum Contra OCC's Motion to Intervene, the OCC is not entitled to participate in the audit process, which was specifically reserved to Signatory Parties to the Stipulation in Case No. 10-388-EL-SSO and continued in Case No. 12-1230-EL-SSO. The Companies also further object that the Commission's Entry of November 4, 2015, Par. (6), and December 9, 2015 state, "Any conclusions, results, or recommendations formulated by the auditor may be examined by any participant to this proceeding" and no such conclusions, results, or recommendations have been filed in this proceeding. Further, certain of the information requested is confidential. Subject to and without waiving the foregoing objections, the Companies provided to Commission Staff courtesy copies of discovery responses to interrogatories of the auditor, which are not "conclusions, results, or recommendations formulated by the auditor" and therefore are not subject to examination by any Non-Signatory participant to the proceeding.



Case No. 15-1739-EL-RDR  
Annual Compliance Audit of Delivery Capital Recovery Rider (DCR) of  
Ohio Edison Company, The Cleveland Electric Illuminating Company,  
and the Toledo Edison Company

REQUEST FOR PRODUCTION OF DOCUMENTS

**OCC Set 1** Please provide copies of all discovery received by the Company from other parties in this  
– **RPD-3** proceeding, and the Company's response to that discovery.

**Response:** The Companies object to this Request for Production as overly broad, irrelevant, and not likely to lead to the discovery of admissible evidence. The Companies object on the grounds that the documents sought are protected under 4901.16, Revised Code. The Companies further object that, as stated in the Companies' Memorandum Contra OCC's Motion to Intervene, the OCC is not entitled to participate in the audit process, which was specifically reserved to Signatory Parties to the Stipulation in Case No. 10-388-EL-SSO and continued in Case No. 12-1230-EL-SSO. Further, the Commission's Entry of November 4, 2015, Par. (6), and December 9, 2015 state, "Any conclusions, results, or recommendations formulated by the auditor may be examined by any participant to this proceeding", and discovery by any Signatory Party during the audit process is not a "conclusion, result, or recommendation formulated by the auditor" and therefore would not be subject to examination by any non-Signatory Party participant to the proceeding. Subject to and without waiving the objections, not applicable.

Case No. 15-1739-EL-RDR  
Annual Compliance Audit of Delivery Capital Recovery Rider (DCR) of  
Ohio Edison Company, The Cleveland Electric Illuminating Company,  
and the Toledo Edison Company

REQUEST FOR PRODUCTION OF DOCUMENTS

**OCC Set 1  
– RPD-4** Please provide copies of all Communications (e.g. email, memos, draft reports) related to this proceeding between the Company and the Commission, the PUCO Staff and/or the PUCO's Attorneys General.

**Response:** The Companies object to this Request for Production as overly broad, irrelevant, and not likely to lead to the discovery of admissible evidence. The Companies object on the grounds that the documents sought are protected under 4901.16, Revised Code. The Companies further object that, as stated in the Companies' Memorandum Contra OCC's Motion to Intervene, the OCC is not entitled to participate in the audit process, which was specifically reserved to Signatory Parties to the Stipulation in Case No. 10-388-EL-SSO and continued in Case No. 12-1230-EL-SSO. Further, the Commission's Entry of November 4, 2015, Par. (6), and December 9, 2015 state, "Any conclusions, results, or recommendations formulated by the auditor may be examined by any participant to this proceeding" and "all Communications related to this proceeding between the Company and the Commission" during the audit process is not a "conclusion, result, or recommendation formulated by the auditor" and therefore would not be subject to examination by any non-Signatory Party participant to the proceeding. Subject to and without waiving the objections, not applicable.

ATTACHMENT 2  
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CONFIDENTIAL INFORMATION

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the 2015 Review of the )  
Delivery Capital Recovery Rider ) Case No. 15-1739-EL-RDR  
Contained in the Tariffs of Ohio Edison )  
Company, The Cleveland Electric )  
Illuminating Company, and the Toledo )  
Edison Company. )

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**AFFIDAVIT OF JODI BAIR**

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I, Jodi Bair, attorney for the Office of the Ohio Consumers' Counsel ("OCC") in the above captioned case, being first duly sworn, depose and state that the following efforts have been made to resolve the differences with the Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company ("FirstEnergy Companies" or "Utility") in regard to OCC's Request for Production of Documents.

1. On March 17, 2016, OCC filed and served a Request for Production of Documents on the FirstEnergy Companies.
2. On April 6, 2016, the FirstEnergy Companies provided responses to OCC's Request for Production of Documents. The responses were only objections and no answers or documents were produced.
3. At some time shortly after April 22, 2016 (when the audit report was docketed), I called FirstEnergy attorney Jim Burk to ask if the Utility would now provide OCC responses to its discovery since the audit report had been docket. Mr. Burk stated that he would check and get back to me. Mr. Burk never returned my call.

4. On June 23, 2016, Staff counsel Steven Beeler forwarded an email to all other parties to the case, asking that we provide edits and/or some type of response to the proposed Stipulation by June 30, 2016. This is the first time that I had seen a Stipulation.

5. Also on June 23, 2016, I sent an email to FirstEnergy's counsel Jim Burk, asking, again, if the Utility would provide responses to OCC's request for production of documents. On June 23, 2016, Utility counsel Carrie Dunn emailed me, letting me know that her colleague Bob Endris would handle the discovery issues.

6. On June 23, 2016, FirstEnergy attorney Bob Endris informed me that the Stipulation would only allow OCC to ask questions about the report itself and that OCC was not entitled to other discovery. OCC made a good faith effort to explain OCC's position and resolve the discovery issue.

7. On June 24, 2016, FirstEnergy emailed a confidential response to OCC, supplementing one of four of OCC's request for production of documents. No other responses to the remaining discovery were provided.

8. Thus, it is clear that efforts to resolve the dispute over the discovery failed, necessitating this Motion to Compel.

STATE OF OHIO            )  
                                      ) SS:  
COUNTY OF FRANKLIN )

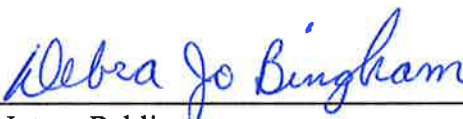
The undersigned, being of lawful age and duly sworn on oath, hereby certifies, deposes and state the following:

I have caused to be prepared the attached written affidavit for OCC in the above referenced cases. This affidavit is true and correct to the best of my knowledge, information and belief.

Further affiant sayeth naught.

  
\_\_\_\_\_  
Jodi Bair, Affiant

Subscribed and sworn to before me this 20th day of July, 2016.

  
\_\_\_\_\_  
Notary Public



Debra Jo Bingham, Notary Public  
Union County, State of Ohio  
My Commission Expires June 13, 2020

**This foregoing document was electronically filed with the Public Utilities**

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**in**

**Case No(s). 15-1739-EL-RDR**

Summary: Motion Motion to Compel by the Office of the Ohio Consumers' Counsel (Public Version) electronically filed by Ms. Deb J. Bingham on behalf of Bair, Jodi Ms.