

**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**

**THE OFFICE OF THE OHIO CONSUMERS' COUNSEL, OHIO
ENVIRONMENTAL COUNCIL AND ENVIRONMENTAL DEFENSE FUND,
THE OHIO MANUFACTURERS' ASSOCIATION ENERGY GROUP, PJM
POWER PROVIDERS GROUP, AND THE SIERRA CLUB**

Under Ohio Adm. Code Rule 4901-1-21(B) and the Notice to Take Depositions¹ previously filed by the Office of the Ohio Consumers' Counsel ("OCC"), please take notice that the Joint Intervenors² will take the oral deposition of all individuals for whom rebuttal testimony or surrebuttal testimony is filed or will be filed in the above-captioned matters on behalf of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company ("FirstEnergy"). Depositions will be taken

¹ Notice to Take Depositions and Request for Production of Documents by the Office of the Ohio Consumers' Counsel, Case No. 14-1297-EL-SSO (December 2, 2014) (In this Notice to Take Depositions the OCC reserved its right to take the deposition of "All persons who will be called by Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company ("Company") to present testimony, including direct, **rebuttal**, **surrebuttal**, and any other form of testimony filed, or to be filed in these proceedings." (emphasis added)).

² OCC, Sierra Club, Ohio Environmental Council and the Environmental Defense Fund, The Ohio Manufacturers' Association Energy Group, PJM Power Providers Group shall be referred to as Joint Intervenors.

of the following individuals who have been identified as rebuttal and surrebuttal witnesses:

1. Sarah Murley.
2. Eileen M. Mikkelsen.

Joint Intervenors will conduct the deposition of Sarah Murley upon oral examination at the offices of Calfee, Halter & Griswold, LLP, 41 S. High St., Columbus, Ohio, 43215, at 1:00 p.m. beginning on July 26, 2016, per oral agreement with FirstEnergy Counsel.

Joint Intervenors will also conduct the deposition of Eileen M. Mikkelsen at FirstEnergy's offices, 76 S. Main St., Akron, Ohio, 44308 at 9:00 a.m., beginning on July 27, 2016 or such other time or place that is mutually agreed upon.

These depositions will continue, from day to day, except for holidays and weekends, until examination by all Joint Intervenors is completed. Each deponent will appear at the designated time and place (or other agreed-to location) with all requested documents (identified below) and remain present until deposed.

The depositions will be taken of the aforementioned deponents on relevant topics related to each witness's rebuttal and/or surrebuttal testimony, including but not limited to, the deponent's knowledge or expertise with the subject matter of these proceedings and the subject matter of the deponent's rebuttal or surrebutal testimony. The depositions 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, each deponent is requested to produce, two hours prior to the scheduled deposition, documents, including, but not limited to:

- (1) copies of any studies conducted for purposes of rebuttal or surrebuttal testimony;
 - (2) any backup documents to rebuttal or surrebuttal testimony, including raw data for such studies;
 - (3) any documents relied upon or cited in the rebuttal or surrebuttal testimony;
- and
- (4) any workpapers that support the rebuttal or surrebuttal testimony.

Respectfully submitted,

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OHIO CONSUMERS' COUNSEL

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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 22nd day of July 2016.

/s/ Larry Sauer

Larry Sauer
Assistant Consumers' Counsel

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Summary: Notice of Deposition Notice to Take Deposition and Requests for Production of Documents by Joint Intervenors electronically filed by Ms. Deb J. Bingham on behalf of Sauer, Larry S.