

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

Carbo Forge, Inc., Wyandot, Inc.,)	
Plaskolite, Inc., American Trim, LLC,)	
Whirlpool Corporation, McWane, Inc.,)	
Navistar, Inc., Sauder Woodworking Co.,)	
McDonald Steel Corporation, Henny)	CASE NO. 14-1610-EL-CSS
Penny Corporation, Lima Refining)	
Company, Campbell Soup Supply)	
Company, LLC., Cooper Tire & Rubber)	
Company, Mantaline Corporation,)	
Republic Steel, Jay Industries, Inc., Sun)	
Chemical Corporation, and 3M Company,)	
)	
Complainants,)	
)	
v.)	
)	
FirstEnergy Solutions Corp.,)	
)	
Respondent.)	

**FIRSTENERGY SOLUTIONS CORP.’S NOTICE OF DEPOSITION
DIRECTED TO HENNY PENNY CORPORATION**

PLEASE TAKE NOTICE that counsel for FirstEnergy Solutions Corp. (“FES”), pursuant to O.A.C. 4901-1-21(F), shall take the deposition of corporate designee(s) of Henny Penny Corporation (“Henny Penny”) on the matters listed on Exhibit A attached hereto commencing on Friday, September 2, 2016, at 1:30 p.m. and continuing from day to day thereafter until completed. The deposition will be taken at the offices of Calfee, Halter & Griswold LLP, 1200 Huntington Center, 41 South High Street, Columbus, OH 43215. The deposition shall take place before a certified court reporter, notary public, or duly authorized officer, authorized by law to administer oaths.

Respectfully Submitted,

/s/ Mark A. Hayden

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Attorneys for FirstEnergy Solutions Corp.

EXHIBIT A

You are directed to designate one or more corporate designees to testify to the following subject matters and any other matters relevant thereto:¹

1. The factual allegations made by Henny Penny in the Complaint filed on September 12, 2014 in PUCO Case No. 14-1610-EL-CSS.

2. Representations made by FES to Henny Penny regarding the terms of Complainant's Contract prior to Henny Penny entering into Complainant's Contract.

3. The terms of Complainant's Contract entered into between FES and Henny Penny.

4. FES's administration of Complainant's Contract with Henny Penny.

5. FES's disclosure of contract terms in Complainant's Contract with Henny Penny.

6. Henny Penny's review and approval of Complainant's Contract prior to Henny Penny entering into Complainant's Contract, including without limitation the legal counsel and/or energy supply consultants relied on to provide advice regarding Complainant's Contract.

7. The allegation in paragraph 68 of the Complaint that RTO Expense Surcharge includes "increased costs for ancillary charges, which are specifically included in the pricing structure of Complainants' Contracts."

¹ Capitalized terms have the same meaning as used in the Complaint filed by you and others on September 12, 2014 in PUCO Case No. 14-1610-EL-CSS.

CERTIFICATE OF SERVICE

A copy of the foregoing Notice of Deposition was served via e-mail delivery this 16th day of August, 2016 via e-mail upon the parties below.

/s/ Mark T. Keaney

One of the Attorneys for FirstEnergy Solutions Corp.

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Case No(s). 14-1610-EL-CSS

Summary: Notice of Deposition Directed to Henny Penny Corporation electronically filed by Mr. Nathaniel Trevor Alexander on behalf of FirstEnergy Solutions Corp.