

**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 Penny Corporation,)	Case No. 14-1610-EL-CSS
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.)	
)	

**COMPLAINANTS' NOTICE OF DEPOSITION
TO FIRSTENERGY SOLUTIONS CORP.**

Under Ohio Adm. Code 4901-1-21(F), please take notice that counsel for Complainants will take the deposition(s) of a corporate designee(s) of FirstEnergy Solutions Corp. (FES) on the matters identified in Exhibit A (attached). The deposition(s) upon oral examination shall commence on September 1, 2016, at 1:00 p.m. and continue from day to day thereafter until completed. Unless otherwise agreed between the parties, the deposition(s) will be taken at the offices of Carpenter Lipps & Leland LLP, 280 North High Street, Suite 1300, Columbus, Ohio, 43215. The deposition(s) will take place before a certified court reporter, notary public, or duly authorized officer, authorized by law to administer oaths.

Respectfully Submitted,

/s/ Kimberly W. Bojko

Kimberly W. Bojko (0069402)
Ryan P. O'Rourke (0082651)
Carpenter Lipps & Leland LLP
280 North High Street, Suite 1300
Columbus, Ohio 43215
Telephone: 614.365.4100
Facsimile: 614.365.9145
bojko@carpenterlipps.com
o'rourke@carpenterlipps.com
(will accept service by email)

Counsel for Complainants

EXHIBIT A

A corporate designee(s) of FES must be designated to testify on the following matters:

1. Counter claims or responses to the factual allegations set forth in the complaint that was filed with the Public Utilities Commission of Ohio on September 12, 2014 in Case No. 14-1610-EL-CSS (Complaint), including those raised or addressed in FES' Answer filed on October 6, 2014.
2. Negotiations that occurred between FES and each Complainant that is referenced in paragraph 37 of the Complaint that resulted in the supply agreements attached to the Complaint as Exhibit B (confidential) (Customer Supply Agreements).
3. The terms and conditions of the Customer Supply Agreements entered into between FES and each Complainant that were attached to the Complaint as Exhibit B (confidential).
4. Communications between FES and each Complainant involving the terms of the Customer Supply Agreements executed between FES and each Complainant that were attached to the Complaint as Exhibit B (confidential).
5. PJM settlements and the billing and invoicing of PJM charges to FES.
6. Factual assertions made by FES in form notices sent to the Complainants in March 2014 notifying Complainants of FES' upcoming assessment of the RTO Expense Surcharge, a sample of which is attached to the Complaint as Exhibit C.
7. Invoices assessing Complainants the RTO Expense Surcharge by FES.
8. Any other relevant matters pertaining to the Complaint.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served upon the following parties via e-mail on
August 18, 2016.

/s/ Ryan P. O'Rourke

Ryan P. O'Rourke

haydenm@firstenergycorp.com
jlang@calfee.com
talexander@calfee.com
mkeaney@calfee.com

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

Summary: Notice of Deposition Complainants' Notice Of Deposition To FirstEnergy Solutions Corp. electronically filed by Ms. Cheryl A Smith on behalf of Carbo Forge, Inc.