

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Columbia)	
Gas of Ohio, Inc. for Approval of Demand Side)	Case No. 16-1309-GA-UNC
Management Program for its Residential and)	
Commercial Customers.)	

In the Matter of the Application of Columbia)	
Gas of Ohio, Inc. for Approval to Change)	Case No. 16-1310-GA-AAM
Accounting Methods.)	

**MOTION FOR
SUBPOENA DUCES TECUM
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

Under Ohio Administrative Code 4901-1-25, the Office of the Ohio Consumers' Counsel ("OCC") hereby respectfully moves the Public Utilities Commission of Ohio ("PUCO"), any commissioner, the legal director, the deputy legal director, or an attorney examiner to issue a subpoena compelling Ms. Sarah Poe, an employee of Columbia Gas of Ohio, Inc. ("Columbia") to appear at hearing and provide oral testimony through cross-examination on September 28, 2016 at 10:00 a.m., and attend from day to day until called to testify by the OCC at the Commission offices, 180 E. Broad Street, 11th Floor, Columbus, Ohio 43215.

The above-captioned case involves Columbia's request for approval of a six-year portfolio of natural gas energy efficiency programs, which will cost customers over \$200 million in program costs (plus profits), Ms. Poe should appear at the evidentiary hearing to provide testimony concerning her knowledge of Columbia's energy efficiency programs. Ms. Poe was identified as the respondent to a number of OCC's discovery

requests. The issues for which Ms. Poe is responsible include, but are not limited to, the calculations of the projected costs and benefits of Columbia's proposed energy efficiency programs. The cost-effectiveness of the proposed energy efficiency programs is in dispute in this case.

Grounds for this Motion are set forth in the accompanying Memorandum in Support.

Respectfully submitted,

BRUCE WESTON (0016973)
OHIO CONSUMERS' COUNSEL

/s/ Christopher Healey
Christopher Healey (00086027)
Counsel of Record
Assistant Consumers' Counsel

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*Outside Counsel to the Office of the Ohio
Consumers' Counsel*

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MEMORANDUM IN SUPPORT

OCC requests a subpoena, pursuant to Ohio Adm. Code 4901-1-25, to command Ms. Sarah Poe, an employee of Columbia Gas of Ohio, Inc., to appear at hearing and provide oral testimony through cross-examination on September 28, 2015 at 10:00 a.m., and attend from day to day until called to testify by OCC at the Commission offices, 180 E. Broad Street, 11th Floor, Columbus, Ohio 43215 in the above-captioned proceeding.

This case involves Columbia's request for approval of a six-year portfolio of natural gas energy efficiency programs, which will cost customers over \$200 million in program costs and profits.. In response to a number of OCC's discovery requests Columbia identified Ms. Poe as the respondent. The discovery requests sought, among other things, the projected costs and benefits of Columbia's proposed energy efficiency programs. As the respondent to such discovery requests, Ms. Poe is in a position to explain in detail how Columbia evaluated its proposed energy efficiency programs to determine whether they are cost effective. No other Columbia witness appears to have such knowledge and expertise.

Ms. Poe should be required to attend the hearing and respond to questions pertaining to the subject matter of those discovery responses for which she was identified as the

respondent by Columbia. Ms. Poe's testimony will facilitate the development of a full and complete record, upon which the PUCO can base its decision. There is good cause to grant this motion for subpoena.

Respectfully submitted,

BRUCE WESTON (0016973)
OHIO CONSUMERS' COUNSEL

/s/ Christopher Healey
Christopher Healey (0086027)
Counsel of Record
Assistant Consumers' Counsel

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*Outside Counsel to the Office of the Ohio
Consumers' Counsel*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Motion for Subpoena by the Office of the Ohio Consumers' Counsel was provided to the persons listed below via electronic transmission, this 23rd day of September, 2016.

/s/ Christopher Healey

Christopher Healey
Assistant Consumers' Counsel

CERTIFICATE OF SERVICE

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PERSONS SERVED

**STATE OF OHIO
PUBLIC UTILITIES COMMISSION
180 EAST BROAD STREET
COLUMBUS, OHIO 43266-0573**

John Kasich
GOVERNOR



**THE PUBLIC UTILITIES COMMISSION OF OHIO
SUBPOENA DUCES TECUM**

TO: Ms. Sarah Poe
Columbia Gas of Ohio, Inc.
290 W. Nationwide Blvd.
Columbus, OH 43215

Upon application of Counsel for the Office of the Ohio Consumers' Counsel ("OCC"), Ms. Sarah Poe is hereby required to appear at hearing and provide oral testimony as under cross-examination on Wednesday, September 28, 2016 at 10:00 a.m., and attend from day to day until called to testify by the OCC at the Commission offices, 180 E. Broad Street, 11th Floor, Columbus, Ohio 43215.

The witness shall submit oral testimony concerning her knowledge of Columbia's energy efficiency programs, consistent with Columbia's responses to OCC's discovery requests for which Ms. Poe was identified as the respondent.

Dated at Columbus, Ohio, this 23rd day of September, 2016.

BY:

Meta See

TITLE:

Attorney Examiner

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 16-1309-GA-UNC, 16-1310-GA-AAM

Summary: Motion Motion for Subpoena Duces Tecum by The Office of the Ohio Consumers' Counsel electronically filed by Ms. Jamie Williams on behalf of Healey, Christopher Mr.