#### BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company for Approval of their Energy Efficiency and Peak Demand Reduction Program Portfolio Plans for 2017 through 2019.

Case No. 16-743-EL-POR

# NOTICE TO TAKE DEPOSITION AND REQUEST FOR PRODUCTION OF DOCUMENTS BY THE OFFICE OF THE OHIO CONSUMERS' COUNSEL

Pursuant to Ohio Adm. Code Rule 4901-1-21(B), please take notice that the Office of the Ohio Consumers' Counsel ("OCC") will take the deposition of Eren Demiray on October 6, 2016 beginning at 10:00 a.m. The deposition shall be held at the offices of FirstEnergy, 76 South Main Street, Akron, Ohio 44308 and will continue from day to day, except for holidays and weekends, until completed.

Mr. Demiray will be deposed on relevant topics within the scope of these proceedings, including but not limited to, the subject matter of his Direct Testimony and his knowledge and expertise on the portfolio plan pertaining to the Application filed on April 15, 2016. The deposition will be taken upon oral examination (as upon crossexamination) before an officer authorized by law to take depositions.

Under Ohio Adm. Code Rules 4901-1-21(E) and 4901-1-20, Mr. Demiray shall make available to OCC, two hours before the start of the deposition, the following documents: discovery responses to OCC's (and other parties') discovery requests that pertain to the Application filed on April 15, 2016; documents that he relied upon or

referred to in producing his Direct Testimony, including any workpapers that support his Direct Testimony; and information in the Companies' possession, custody, or control that pertain to the Application.

Respectfully submitted,

## BRUCE WESTON (0016973) OHIO CONSUMERS' COUNSEL

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

Office of the Ohio Consumers' Counsel 10 West Broad Street, Suite 1800 Columbus, Ohio 43215-3485 Telephone: (614) 466-9571 (Healey direct) <u>christopher.healey@occ.ohio.gov</u> (Will accept email service)

Dane Stinson (0019101) Bricker & Eckler LLP 100 South Third Street Columbus, Ohio 43215 Telephone: (614) 227-4854 <u>dstinson@bricker.com</u> (Will accept email service)

Outside Counsel for the Office of the Ohio Consumers' Counsel

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Notice to Take Depositions and Request for Production of Documents was served on the persons stated below via electric transmission this 28th day of September 2016.

> <u>/s/ Christopher Healey</u> Christopher Healey Assistant Consumers' Counsel

### SERVICE LIST

mfleisher@elpc.org kfield@elpc.org tdougherty@theOEC.org mleppla@theoec.org cmooney@ohiopartners.org ricks@ohanet.org mwarnock@bricker.com dborchers@bricker.com mpritchard@mwncmh.com callwein@keglerbrown.com sechler@carpenterlipps.com gpoulos@enernoc.com joliker@igsenergy.com john.jones@ohioattorneygeneral.gov

jburk@firstenergycorp.com cdunn@firstenergycorp.com eostrowski@firstenergycorp.com leiterr@firstenergycorp.com mrgladman@jonesday.com Kjklaw@yahoo.com jfinnigan@edf.org rdove@attorneydove.com ORourke@carpenterlipps.com Bojko@carpenterlipps.com Ghiloni@carpenterlipps.com rkelter@elpc.org swilliams@nrdc.org

Attorney Examiners:

Richard.bulgrin@puc.state.oh.us

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Case No(s). 16-0743-EL-POR

Summary: Notice of Deposition Notice to Take Deposition and Request for Production of Documents of Eren Demiray by the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Healey, Christopher Mr.