

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
The Dayton Power and Light Company for	)	Case No. 16-0395-EL-SSO
Approval of Its Electric Security Plan	)	
	)	
In the Matter of the Application of	)	
The Dayton Power and Light Company for	)	Case No. 16-0396-EL-ATA
Approval of Revised Tariffs	)	
	)	
In the Matter of the Application of The	)	
Dayton Power and Light Company for	)	
Approval of Certain Accounting Authority	)	Case No. 16-0397-EL-ATA
Pursuant to Ohio Rev. Code § 4905.13	)	

**NOTICE TO TAKE DEPOSITIONS
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
BY INTERSTATE GAS SUPPLY, INC.**

Pursuant to Ohio Adm. Rule 4901-1-21(B), please take notice that Interstate Gas Supply, Inc. (“IGS”) will take the oral deposition of all individuals for whom testimony is filed or will be filed in the above-captioned matters or who have knowledge and expertise with the subject matter of these proceedings on behalf the Dayton Power and Light Company (“DP&L”) including, but not limited to, the following individuals:

1. All persons who will be called by DP&L to present testimony, including direct, rebuttal, surrebuttal, and any other form of testimony filed, or to be filed in these proceedings.
2. All persons responsible for answering DP&L’s interrogatories and/or responding to requests for production of documents (including responses that state that no documents are responsive to a request to produce) served in these proceedings upon DP&L.

IGS seeks to conduct the deposition of Craig Jackson upon oral examination at IGS Energy, 6100 Emerald Parkway, Dublin, Ohio 43054 at 8:00 a.m. beginning on November 30, 2016, or such other time or place that is mutually agreed upon by the Parties. IGS shall

schedule additional depositions at a time mutually agreed to by IGS and DP&L. The depositions will take place from day to day, except for holidays and weekends, until completed. Each deponent will appear at IGS at the designated time and date with all requested documents (identified below) and remain present until deposed.

The depositions will be taken of the aforementioned deponents on relevant topics within the scope of these proceedings, including but not limited to, the subject matter of the deponent's testimony and the deponent's knowledge and expertise with the subject matter of these proceedings. The depositions will be taken upon oral examination (as upon cross-examination) before an officer authorized by law to take depositions.

Pursuant to Ohio Adm. Code Rules 4901-1-21(E) and 4901-1-20, each deponent is requested to produce, two hours prior to his/her deposition, all documents relating to his/her responsibilities with respect to Case Nos. 16-395-EL-SSO, *et al.* and responses to discovery that were authored by the deponent or were provided to IGS with input from the deponent. Additionally, the deponent shall bring documents, including, but not limited to, the results of any studies done for these proceedings and any backup documents, including raw data for such studies, any documents relied upon or cited in the pre-filed testimony, and any workpapers that support the pre-filed testimony.

Respectfully submitted,

/s/ Joseph Olikier

Joseph Olikier (0086088)

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IGS Energy

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Dublin, Ohio 43016

Telephone: (614) 659-5000

Attorney for IGS Energy

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 23rd day of November 2016.

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/s/ Joseph Olikier

Joseph Olikier

Counsel for Interstate Gas Supply, Inc.

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 16-0395-EL-SSO, 16-0396-EL-ATA, 16-0397-EL-AAM

Summary: Notice of Depositions electronically filed by Mr. Joseph E. Olier on behalf of IGS Energy