

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)
Edison Company, the Cleveland Electric)
Illuminating Company, and the Toledo)
Edison Company for Approval of their) Case No. 16-743-EL-POR
Energy Efficiency and Peak Demand)
Reduction Program Portfolio Plans for)
2017 through 2019.)

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

Under Ohio Adm. Code Rule 4901-1-21(B), please take notice that the Office of the Ohio Consumers' Counsel ("OCC") will take the oral deposition of Edward C. Miller. OCC seeks to conduct the deposition of this individual upon oral examination on January 19, 2017 at or around 1:00 pm eastern time at a location that is mutually agreeable to the parties. The deposition will continue, from day to day, except for holidays and weekends, until completed. The deponent will appear at the agreed upon place at the designated time and date with all requested documents (identified below) and remain present until deposed.

The deposition will be taken of the aforementioned deponent 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 deposition will be taken upon oral examination (as upon cross-examination) before an officer authorized by law to take depositions.

Under Ohio Adm. Code Rules 4901-1-21(E) and 4901-1-20, the deponent is requested to produce, at least 24 hours prior to his deposition, all documents relating to his responsibilities with respect to Case No. 16-743-EL-POR and responses to discovery that were authored by the deponent or were provided to OCC with input from the deponent. Additionally, the deponent shall produce 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,

BRUCE WESTON (0016973)
OHIO CONSUMERS' COUNSEL

/s/ Christopher Healey

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)
christopher.healey@occ.ohio.gov
(will accept email service)

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

Outside Counsel for the Office of the Ohio
Consumers' Counsel

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing Notice to Take Deposition and Request for Production of Documents was served by electronic transmission upon the parties below this 10th day of January, 2017.

/s/ Christopher Healey _____

Christopher Healey

Assistant Consumers' Counsel

SERVICE LIST

mfleisher@elpc.org

tdougherty@theOEC.org

mleppla@theoec.org

cmooney@ohiopartners.org

ricks@ohanet.org

mwarnock@bricker.com

dborchers@bricker.com

dparram@bricker.com

mpritchard@mwncmh.com

sehler@carpenterlipps.com

gpoulos@enernoc.com

callwein@keglerbrown.com

Natalia.messenger@ohioattorneygeneral.gov

John.jones@ohioattorneygeneral.gov

cdunn@firstenergycorp.com

eostrowski@firstenergycorp.com

leiterr@firstenergycorp.com

Kjklaw@yahoo.com

mrgladman@jonesday.com

stostado@jonesday.com

jfinnigan@edf.org

rdove@attorneydove.com

Bojko@carpenterlipps.com

perko@carpenterlipps.com

paul@carpenterlipps.com

rkelter@elpc.org

joliker@igsenergy.com

swilliams@nrdc.org

Attorney Examiner:

Richard.bulgrin@puc.state.oh.us

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

1/10/2017 11:40:14 AM

in

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

Summary: Notice of Deposition Notice to Take Deposition and Request for Production of Documents by The Office of the Ohio Consumers' Counsel electronically filed by Ms. Jamie Williams on behalf of Healey, Christopher Mr.