

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 Approval of Revised Tariffs. ) Case No. 16-0396-EL-ATA )

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

1. All persons who will be called by the Dayton Power and Light Company (“Utility” or “DP&L”) to present testimony, including direct, supplemental, rebuttal, surrebuttal, and any other form of testimony filed, or to be filed in these proceedings; and
2. All persons responsible for answering interrogatories, data requests 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.

OCC seeks to conduct the deposition of these individual(s) upon oral examination at OCC's offices, 10 W. Broad St., 18th Floor, Columbus, Ohio, 43215, at date and time that is mutually agreeable to the parties. The depositions will continue, one-after-the-other, from day to day, except for holidays and weekends, until completed. Each 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 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.

Under 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 No. 16-0395-EL-SSO and responses to discovery that were authored by the deponent or were provided to OCC 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.

BRUCE WESTON (0016973)  
OHIO CONSUMERS' COUNSEL

/s/ William Michael

William Michael, (0070921)

Counsel of Record

Kevin F. Moore (0089228)

Ajay Kumar (0092208)

Andrew Garver (PHV-10193-2017)

Assistant Consumers' Counsel

**Office of the Ohio Consumers' Counsel**

10 West Broad Street, Suite 1800

Columbus, Ohio 43215-3485

Telephone: [Michael] (614) 466-1291

Telephone: [Moore] (614) 387-2965

Telephone: [Kumar] (614) 466-1292

Telephone: [Garver] (614) 466-9569

[william.michael@occ.ohio.gov](mailto:william.michael@occ.ohio.gov)

[kevin.moore@occ.ohio.gov](mailto:kevin.moore@occ.ohio.gov)

[ajay.kumar@occ.ohio.gov](mailto:ajay.kumar@occ.ohio.gov)

[andrew.garver@occ.ohio.gov](mailto:andrew.garver@occ.ohio.gov)

(All will accept service via email)

## **CERTIFICATE OF SERVICE**

It is hereby certified that a true copy of the foregoing Notice to Take Depositions and Request for Production of Documents was served via electronic transmission upon the parties below this 7<sup>th</sup> day of March, 2017.

/s/ William Michael

William Michael

Assistant Consumers' Counsel

## **SERVICE LIST**

william.wright@ohioattorneygeneral.gov	michael.schuler@aes.com
natalia.messenger@ohioattorneygeneral.gov	cfaruki@ficlaw.com
dboehm@bkllawfirm.com	djireland@ficlaw.com
mkurtz@bkllawfirm.com	jsharkey@ficlaw.com
jkylern@bkllawfirm.com	mfleisher@elpc.org
kboehm@bkllawfirm.com	kfield@elpc.org
fdarr@mwncmh.com	jeffrey.mayes@monitoringanalytics.com
mpritchard@mwncmh.com	evelyn.robinson@pjm.com
mjsettineri@vorys.com	schmidt@sppgrp.com
smhoward@vorys.com	rsahli@columbus.rr.com
glpetrucci@vorys.com	tony.mendoza@sierraclub.org
ibatikov@vorys.com	kristin.henry@sierraclub.org
wasieck@vorys.com	gpoulos@enernoc.com
tdougherty@theOEC.org	mdortch@kravitzllc.com
cmooney@ohiopartners.org	rparsons@kravitzllc.com
joliker@igsenergy.com	Bojko@carpenterlipps.com
mswhite@igsenergy.com	perko@carpenterlipps.com
ebetterton@igsenergy.com	Ghiloni@carpenterlipps.com
Slessor@calfee.com	paul@carpenterlipps.com
jlang@calfee.com	sechler@carpenterlipps.com
tallexander@calfee.com	rick.sites@ohiohospitals.org
mkeaney@calfee.com	mwarnock@bricker.com
slessor@calfee.com	dparram@bricker.com
jlang@calfee.com	dborchers@bricker.com
amy.spiller@duke-energy.com	lhawrot@spilmanlaw.com
elizabeth.watts@duke-energy.com	dwilliamson@spilmanlaw.com
jeanne.kingery@duke-energy.com	charris@spilmanlaw.com
gthomas@gtpowergroup.com	ejacobs@ablelaw.org
stheodore@epsa.org	laurac@chappelleconsulting.net
cpiriki@dickinsonwright.com	todonnell@dickinsonwright.com
wvorys@dickinsonwright.com	rseiler@dickinsonwright.com
Attorney Examiners:	mcrawford@djflawfirm.com
gregory.price@puc.state.oh.us	jdoll@djflawfirm.com
bryce.mckenney@puc.state.oh.us	

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**3/7/2017 3:39:32 PM**

**in**

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

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