

SUBURBAN NATURAL GAS COMPANY

V.

Respondent.

Case No. 17-2168-GA-CSS

Complainant Suburban Natural Gas Company (Suburban) brings this motion under Rule 4901-1-25(A)(2), O.A.C., to request issuance of a subpoena *duces tecum*. The requested subpoena directs a third party to appear for a deposition. The deponent, Mr. Jeff Thompson, is an employee of Pulte Homes. Pulte Homes is a builder in the Glenross subdivision and other areas in Delaware County, Ohio. Based on Suburban's interactions with Mr. Thompson and Pulte Homes, Suburban has reason to believe that Mr. Thompson possesses information relevant to the subject matter of this proceeding. Accordingly, good cause exists for issuance of the subpoena.

Complainant will arrange for service of the subpoena and payment of applicable witness fees.

Dated: February 23, 2018

Respectfully submitted,

/s/ Mark A. Whitt

Mark A. Whitt

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(All attorneys consent to service
by email)

ATTORNEYS FOR
SUBURBAN NATURAL GAS
COMPANY

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Complainant's Motion for Subpoena was served by electronic mail on the 23rd day of February 2018 upon the following:

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/s/Mark A. Whitt

One of the Attorneys for Suburban Natural Gas
Company

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

SUBPOENA DUCES TECUM

TO: Mr. Jeff Thompson
Pulte Homes
4900 Tuttle Crossing Blvd.
Dublin, OH 43016

Upon application of Suburban Natural Gas Company, you are hereby required to appear at the offices of Whitt Sturtevant LLP, 88 E. Broad Street, Suite 1590, Columbus, Ohio 43215 on March 8, 2018, at 10:00 a.m., to give testimony at a deposition in the following proceeding:

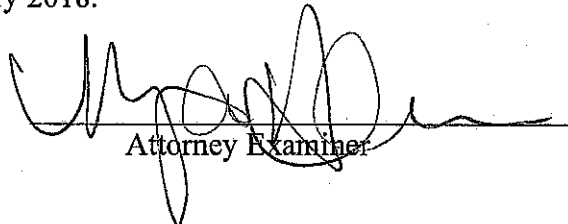
Case No. 17-2168-GA-CSS
Suburban Natural Gas Company v. Columbia Gas of Ohio, Inc.

You shall bring with you the following:

1. All written and electronic correspondence between you and any employee or representative of Columbia Gas of Ohio, Inc. since January 1, 2016 regarding the terms and conditions of gas service to residential homes constructed or to be constructed in Orange, Berlin, and/or Genoa townships (Delaware County, Ohio); including terms and conditions of any builder incentives, rebates, and other promotional consideration offered by Columbia
2. All written and electronic sales brochures, price lists, floor plan descriptions, lists of features and options, videos, and other marketing materials used by Pulte Homes since January 1, 2016 to promote home sales in any phase of the Glenross residential subdivision in Delaware County, Ohio.
3. All written and electronic materials used by Pulte since January 1, 2016 to promote or describe the energy efficiency features of homes constructed or to be constructed in the geographic areas described in 1 and 2 above.

Please contact Mark Whitt, counsel for Suburban Natural Gas Company, to confirm the date and time of the deposition, or to arrange a different date or time if necessary. Mr. Whitt may be reached at 614-224-3911, or whitt@whitt-sturtevant.com.

Dated at Columbus, Ohio this 23rd day of February 2018.


Attorney Examiner

Notice: If you are not a party or an officer, agent, or employee of a party to this proceeding, then witness fees for attending under this subpoena are to be paid by the party at whose request the witness is summoned.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

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in

Case No(s). 17-2168-GA-CSS

Summary: Motion for Subpoena electronically filed by MARK A WHITT on behalf of Suburban Natural Gas Co.