

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of)	
Citizens Against Clear Cutting, et al.,)	
)	
Complainants,)	Case No. 17-2344-EL-CSS
)	
v.)	
)	
Duke Energy Ohio, Inc.,)	
)	
Respondent.)	

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

Pursuant to Ohio Adm. Code Section 4901-1-21(B), please take notice that the Office of the Ohio Consumers' Counsel ("OCC") will take the deposition upon oral examination via telephone of Kevin McLoughlin, who has been identified as a Senior Consultant with Environmental Consultants, Inc., in this proceeding. The deposition will be conducted at 520 Business Park Circle, Stoughton, WI 53589, beginning at 10:00 a.m. Eastern Time on November 2, 2018. Mr. McLoughlin will appear 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 this proceeding, including but not limited to, the subject matter of the deponent's knowledge and expertise with the subject matter of this proceeding. The

deposition 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, Mr. McLoughlin is requested to produce, at least two hours prior to the taking of his deposition the following documents:

1. All documents relating to Duke's vegetation management program for the properties at issue in this proceeding, including but not limited to the removal of trees and the spraying of herbicides on the property; and
2. All responses to discovery requests including, any backup documentation and/or raw data; and
3. The results of any studies or analysis conducted for this proceeding.

Respectfully submitted,

Bruce Weston (0016973)
Ohio Consumers' Counsel

/s/ Terry L. Etter
Terry L. Etter (0067445)
Counsel of Record
Assistant Consumers' Counsel

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(will accept service via email)

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Notice to Take Deposition and Requests for Production of Documents was served on the persons stated below via electronic transmission this 30th day of October 2018.

/s/ Terry L. Etter
Terry L. Etter
Assistant Consumers' Counsel

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in

Case No(s). 17-2344-EL-CSS

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