

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the 2018 Long-Term Forecast Report on behalf of Ohio Power Company and Related Matters.	)	Case No. 18-0501-EL-FOR
	)	
	)	
In the Matter of the Application Seeking Approval of Ohio Power Company's Proposal to Enter into Renewable Energy Purchase Agreements for Inclusion in the Renewable Generation Rider	)	Case No. 18-1392-EL-RDR
	)	
	)	
In the Matter of the Application of Ohio Power Company to Amend its Tariffs	)	Case No. 18-1393-EL-ATA
	)	

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**NOTICE TO TAKE DEPOSITION AND REQUEST FOR PRODUCTION OF DOCUMENTS BY INTERSTATE GAS SUPPLY, INC. AND IGS SOLAR, LLC**

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In accordance with Ohio Administrative Code 4901-1-21(B), Interstate Gas Supply, Inc. and IGS Solar, LLC (collectively "IGS") hereby submits notice of its intention to take the deposition upon oral examination of the following witness that the Sierra Club relied upon to provide direct testimony in the above-captioned proceeding: Michael Goggin.

IGS and the Sierra Club agree to conduct the deposition by phone on January 10 from 9:00 a.m. to 2:00 p.m. EST. The telephone number to join the deposition is 1-872-240-3212. The access code is 478-206-501. The deposition will continue from day to day, except for holidays and weekends, until completed.

Pursuant to Ohio Administrative Code 4901-1-21(E) and 4901-1-20, Sierra Club's witness is requested to produce, at least two hours prior to the taking of his or her deposition, 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. The witness will appear at a mutually agreed-upon time and date with all requested documents and will remain present until deposed.

Respectfully submitted,

/s/ Joseph Olikier

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***Attorneys for IGS Energy***

**CERTIFICATE OF SERVICE**

I certify that this *Notice to Take Deposition and Request for Production of Documents*. was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio and served this 4<sup>th</sup> day of January 2019 via electronic mail upon the following:

Thomas.mcnamee@ohioattorneygeneral.gov William.wright@ohioattorneygeneral.gov Tonnetta.scott@ohioattorneygeneral.gov kboehm@BKLawfirm.com jkylecohn@BKLawfirm.com mpritchard@mwncmh.com fdarr@mwnchm.com paul@carpenterlipps.com bojko@carpenterlipps.com dressel@carpenterlipps.com mleppla@theOEC.org jstock@beneschlaw.com llee@beneschlaw.com jrego@beneschlaw.com msilberman@beneschlaw.com dparram@bricker.com dborchers@bricker.com mdortch@kravitzllc.com cpirik@dickinsonwright.com todonnell@dickinsonwright.com wvorys@dickinsonwright.com cluse@dickinsonwright.com cpirik@dickinsonwright.com	stnourse@aep.com cblend@aep.com egallon@porterwright.com bhughes@porterwright.com christopher.miller@icemiller.com Jason.rafeld@icemiller.com tony.mendoza@sierraclub.org rsahli@columbusrr.com cmoooney@opae.org mnugent@igsenergy.com rdove@keglerbrown.com whitt@whitt-sturtevant.com glover@whitt-sturtevant.com callwein@keglerbrown.com mjsettineri@vorys.com glpetrucci@vorys.com ktreadway@oneenergyllc.com Maureen.willis@occ.ohio.gov William.michael@occ.ohio.gov Christopher.healey@occ.ohio.gov
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/s/ Joseph Olikier  
Joseph Olikier  
Senior Regulatory Counsel  
Interstate Gas Supply, Inc.

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

**Commission of Ohio Docketing Information System on**

**1/4/2019 2:50:13 PM**

**in**

**Case No(s). 18-0501-EL-FOR, 18-1392-EL-RDR, 18-1393-EL-ATA**

Summary: Notice of Deposition Notice to Take Deposition of Sierra Club Witness Michael Goggin electronically filed by Mr. Michael A Nugent on behalf of Interstate Gas Supply, Inc. and IGS Solar, LLC