

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Suburban Natural Gas Company for an Increase in Gas Distribution Rates.)	Case No. 18-1205-GA-AIR
)	
In the Matter of the Application of Suburban Natural Gas Company for Tariff Approval.)	Case No. 18-1206-GA-ATA
)	
In the Matter of the Application of Suburban Natural Gas Company for Approval of Certain Accounting Authority.)	Case No. 18-1207-GA-AAM
)	

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

Please take notice that the Office of the Ohio Consumers' Counsel ("OCC") will take the oral deposition of Andrew J. Sonderman under Ohio Adm. Code Rule 4901-1-21. OCC seeks to conduct the deposition of this individual upon oral examination on April 19th, 2019 at 10:00 a.m. eastern time at the offices of Carpenter Lipps & Leland LLP, 280 N. High St., Suite 1300, Columbus, OH 43215, or 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), the deponent is requested to produce, at least 48 hours prior to his deposition, the following documents:

1. Any amendments, supplements, or modifications to the pipeline lease agreement between Del-Mar Pipeline Co., LLC and Suburban identified in Suburban's response to Staff DR 65-02(a).
2. All closing documents related to the "Closing" identified in Section 3 of the Stock Purchase Agreement that Suburban produced as Staff DR-95 Attachment A.
3. Any documents related to any merger between Suburban and Margco, Inc.
4. Any documents related to any merger between Suburban and Del-Mar Pipeline Co., LLC or Del-Mar Pipeline Co., Inc.
5. All documents supporting the \$4,629,797 purchase price under the Stock Purchase Agreement that Suburban produced as Staff DR-95 Attachment A.
6. All General Ledger Account entries for the months of January through March 2019 for sub-accounts 14611 A/R – DEL-MAR, 14614 – A/R MARGO, and 23201 ACC PAY – DEL-MAR / MARGO.
7. All documents, including but not limited to engineering or other studies, on which Suburban relied when deciding to build the Del-Mar pipeline extension.
8. All documents that demonstrate that there is a "need" for the Del-Mar pipeline extension, as that term is used under Ohio Administrative Code 4906-6-05(B)(2).
9. Any reports or other documents related to any GASWorkS gas flow modeling regarding the Del-Mar pipeline extension.
10. All written communications between Suburban and the PUCO Staff regarding the Del-Mar pipeline extension, including but not limited to, responses to Staff data requests in PUCO Case No. 18-54-GA-BLN.

Respectfully submitted,

Bruce Weston (0016973)
Ohio Consumers' Counsel

/s/ Christopher Healey
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Counsel of Record
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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 9th day of April 2019.

/s/ Christopher Healey
Christopher Healey
Assistant Consumers' Counsel

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in

Case No(s). 18-1205-GA-AIR, 18-1206-GA-ATA, 18-1207-GA-AAM

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.