

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's	:	
Investigation into Verde Energy USA	:	
Ohio, LLC's Compliance with the Ohio	:	Case No. 19-0958-GE-COI
Administrative Code and Potential	:	
Remedial Actions for Non-Compliance.	:	

**MOTION FOR ISSUANCE OF SUBPOENAS
SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO**

The Staff of the Public Utilities Commission of Ohio (Staff) respectfully requests that the Commission, the Legal Director, or the Attorney Examiner to issue subpoenas requiring the following persons: John Ehrmin, Sylvia Acton, Emilia Walczak, Amy Spiller, John Ryan, and Maureen Harbolt to attend and give testimony at the hearing scheduled in the above-captioned case at 10:00 a.m. on June 10, 2019 at the offices of the Public Utilities Commission of Ohio, 180 East Broad Street, 11th Floor, Columbus, Ohio. This request is made pursuant to Ohio Adm.Code 4901-1-25(A).

The testimony of these witnesses are necessary in order for the Public Utilities Commission of Ohio (Commission) to evaluate whether Verde Energy USA Ohio, LLC has failed to comply with any applicable certification standards or has engaged in anticompetitive or unfair, deceptive, or unconscionable acts or practices in this state.

All of these witnesses are residential consumers who have contacted the Staff concerning practices of Verde Energy USA Ohio, LLC. The proposed Subpoenas are

appended to this motion. Upon receiving the original signed subpoenas, counsel for Staff will effectuate service by certified mail as authorized by Ohio Adm.Code 4901-1-25(B).

Respectfully submitted,

Dave Yost
Ohio Attorney General

John H. Jones
Section Chief

/s/ Thomas G. Lindgren _____

Thomas G. Lindgren
Assistant Attorney General
Public Utilities Section
30 East Broad Street, 16th Floor
Columbus, Ohio 43215-3414
614.466.4395 (telephone)
614.644.8764 (facsimile)
john.jones@ohioattorneygeneral.gov
thomas.lindgren@ohioattorneygeneral.gov

**On Behalf of the Staff of the
Public Utilities Commission of Ohio**

CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing **Motion for Issuance of Subpoenas** was served by regular U.S. mail or via electronic mail, upon the following parties of record, this 16th day of May, 2019.

/s/ Thomas G. Lindgren

Thomas G. Lindgren
Assistant Attorney General

Parties of Record:

Karen White

Verde Energy USA Ohio, LLC
12140 Wickchester Lane, Suite 100
Houston, Texas 77079
kwhite@sparkenergy.com

Angela O'Brien

Terry L. Etter

Office of the Ohio Consumers' Counsel
65 East State Street, 7th Floor
Columbus, Ohio 43215-4203
angela.obrien@occ.ohio.gov
terry.etter@occ.ohio.gov

David F. Proano

Daniel Lemon

Taylor Thompson

Kendall C. Kash

Baker & Hostetler LLP
127 Public Square, Suite 2000
Cleveland, Ohio 44114
dproano@bakerlaw.com
dlemon@bakerlaw.com
tathompson@bakerlaw.com
kkash@bakerlaw.com

Joseph E. Olikier

IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
joliker@igsenergy.com

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's	:	
Investigation into Verde Energy USA	:	
Ohio, LLC's Compliance with the Ohio	:	Case No. 19-0958-GE-COI
Administrative Code and Potential	:	
Remedial Actions for Non-Compliance.	:	

SUBPOENA

TO:

John Ehrmin
2800 Hasty Road
Ottawa Hills, Ohio 43615

Upon application of the Staff of the Public Utilities Commission of Ohio (Staff), you are hereby required to attend and make yourself available to give oral testimony at the hearing commencing June 10, 2019, at 10:00 a.m., and continuing from day to day until complete at the offices of the Public Utilities Commission of Ohio, 180 East Broad Street, 11th Floor, Columbus, Ohio.

You shall attend and make yourself available from day to day to be called by the Staff as a witness.

This Subpoena is issued under the authority granted to the Public Utilities Commission of Ohio (Commission) in Sections 4901.22, 4903.02, 4903.03, 4903.04, 4905.05, and 4905.06 of the Ohio Revised Code.

If any person fails to obey a subpoena, the Commission may seek appropriate judicial relief against such person.

Dated this _____ day of May, 2019, _____
Attorney Examiner, Public Utilities
Commission of Ohio

RETURN: I hereby certify that I served the within subpoena on John Ehrmin, on the
_____ day of May, 2019, by mailing the subpoena via United States mail as
certified or express mail, return receipt requested. A true copy of the
signed receipt is attached hereto.

Signed,

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's	:	
Investigation into Verde Energy USA	:	
Ohio, LLC's Compliance with the Ohio	:	Case No. 19-0958-GE-COI
Administrative Code and Potential	:	
Remedial Actions for Non-Compliance.	:	

SUBPOENA

TO:

Sylvia Acton
51 South Stanwood Road
Columbus, Ohio 43209

Upon application of the Staff of the Public Utilities Commission of Ohio (Staff), you are hereby required to attend and make yourself available to give oral testimony at the hearing commencing June 10, 2019, at 10:00 a.m., and continuing from day to day until complete at the offices of the Public Utilities Commission of Ohio, 180 East Broad Street, 11th Floor, Columbus, Ohio.

You shall attend and make yourself available from day to day to be called by the Staff as a witness.

This Subpoena is issued under the authority granted to the Public Utilities Commission of Ohio (Commission) in Sections 4901.22, 4903.02, 4903.03, 4903.04, 4905.05, and 4905.06 of the Ohio Revised Code.

If any person fails to obey a subpoena, the Commission may seek appropriate judicial relief against such person.

Dated this _____ day of May, 2019, _____
Attorney Examiner, Public Utilities
Commission of Ohio

RETURN: I hereby certify that I served the within subpoena on Sylvia Acton, on the
_____ day of May, 2019, by mailing the subpoena via United States mail as
certified or express mail, return receipt requested. A true copy of the
signed receipt is attached hereto.

Signed,

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's	:	
Investigation into Verde Energy USA	:	
Ohio, LLC's Compliance with the Ohio	:	Case No. 19-0958-GE-COI
Administrative Code and Potential	:	
Remedial Actions for Non-Compliance.	:	

SUBPOENA

TO:

Emilia Walczak
275 Rathburn Drive
Lakeside, Ohio 43440

Upon application of the Staff of the Public Utilities Commission of Ohio (Staff), you are hereby required to attend and make yourself available to give oral testimony at the hearing commencing June 10, 2019, at 10:00 a.m., and continuing from day to day until complete at the offices of the Public Utilities Commission of Ohio, 180 East Broad Street, 11th Floor, Columbus, Ohio.

You shall attend and make yourself available from day to day to be called by the Staff as a witness.

This Subpoena is issued under the authority granted to the Public Utilities Commission of Ohio (Commission) in Sections 4901.22, 4903.02, 4903.03, 4903.04, 4905.05, and 4905.06 of the Ohio Revised Code.

If any person fails to obey a subpoena, the Commission may seek appropriate judicial relief against such person.

Dated this _____ day of May, 2019, _____
Attorney Examiner, Public Utilities
Commission of Ohio

RETURN: I hereby certify that I served the within subpoena on Emilia Walczak, on
the _____ day of May, 2019, by mailing the subpoena via United States
mail as certified or express mail, return receipt requested. A true copy of
the signed receipt is attached hereto.

Signed,

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's	:	
Investigation into Verde Energy USA	:	
Ohio, LLC's Compliance with the Ohio	:	Case No. 19-0958-GE-COI
Administrative Code and Potential	:	
Remedial Actions for Non-Compliance.	:	

SUBPOENA

TO:

Amy Spiller
139 East 4th Street – 1409 – Main
Cincinnati, Ohio 45202

Upon application of the Staff of the Public Utilities Commission of Ohio (Staff), you are hereby required to attend and make yourself available to give oral testimony at the hearing commencing June 10, 2019, at 10:00 a.m., and continuing from day to day until complete at the offices of the Public Utilities Commission of Ohio, 180 East Broad Street, 11th Floor, Columbus, Ohio.

You shall attend and make yourself available from day to day to be called by the Staff as a witness.

This Subpoena is issued under the authority granted to the Public Utilities Commission of Ohio (Commission) in Sections 4901.22, 4903.02, 4903.03, 4903.04, 4905.05, and 4905.06 of the Ohio Revised Code.

If any person fails to obey a subpoena, the Commission may seek appropriate judicial relief against such person.

Dated this _____ day of May, 2019, _____
Attorney Examiner, Public Utilities
Commission of Ohio

RETURN: I hereby certify that I served the within subpoena on Amy Spiller, on the
_____ day of May, 2019, by mailing the subpoena via United States mail as
certified or express mail, return receipt requested. A true copy of the
signed receipt is attached hereto.

Signed,

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's	:	
Investigation into Verde Energy USA	:	
Ohio, LLC's Compliance with the Ohio	:	Case No. 19-0958-GE-COI
Administrative Code and Potential	:	
Remedial Actions for Non-Compliance.	:	

SUBPOENA

TO:

John Ryan
476 East Sycamore Street
Columbus, Ohio 43206

Upon application of the Staff of the Public Utilities Commission of Ohio (Staff), you are hereby required to attend and make yourself available to give oral testimony at the hearing commencing June 10, 2019, at 10:00 a.m., and continuing from day to day until complete at the offices of the Public Utilities Commission of Ohio, 180 East Broad Street, 11th Floor, Columbus, Ohio.

You shall attend and make yourself available from day to day to be called by the Staff as a witness.

This Subpoena is issued under the authority granted to the Public Utilities Commission of Ohio (Commission) in Sections 4901.22, 4903.02, 4903.03, 4903.04, 4905.05, and 4905.06 of the Ohio Revised Code.

If any person fails to obey a subpoena, the Commission may seek appropriate judicial relief against such person.

Dated this _____ day of May, 2019, _____
Attorney Examiner, Public Utilities
Commission of Ohio

RETURN: I hereby certify that I served the within subpoena on John Ryan, on the
_____ day of May, 2019, by mailing the subpoena via United States mail as
certified or express mail, return receipt requested. A true copy of the
signed receipt is attached hereto.

Signed,

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's	:	
Investigation into Verde Energy USA	:	
Ohio, LLC's Compliance with the Ohio	:	Case No. 19-0958-GE-COI
Administrative Code and Potential	:	
Remedial Actions for Non-Compliance.	:	

SUBPOENA

TO:

Maureen Harbolt
180 East Broad Street, 7th Floor
Columbus, Ohio 43215

Upon application of the Staff of the Public Utilities Commission of Ohio (Staff), you are hereby required to attend and make yourself available to give oral testimony at the hearing commencing June 10, 2019, at 10:00 a.m., and continuing from day to day until complete at the offices of the Public Utilities Commission of Ohio, 180 East Broad Street, 11th Floor, Columbus, Ohio.

You shall attend and make yourself available from day to day to be called by the Staff as a witness.

This Subpoena is issued under the authority granted to the Public Utilities Commission of Ohio (Commission) in Sections 4901.22, 4903.02, 4903.03, 4903.04, 4905.05, and 4905.06 of the Ohio Revised Code.

If any person fails to obey a subpoena, the Commission may seek appropriate judicial relief against such person.

Dated this _____ day of May, 2019, _____
Attorney Examiner, Public Utilities
Commission of Ohio

RETURN: I hereby certify that I served the within subpoena on Maureen Harbolt, on
the _____ day of May, 2019, by mailing the subpoena via United States
mail as certified or express mail, return receipt requested. A true copy of
the signed receipt is attached hereto.

Signed,

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/16/2019 4:46:53 PM

in

Case No(s). 19-0958-GE-COI

Summary: Motion for Issuance of Subpoenas for John Ehrmin, Sylvia Acton, Emilia Walczak, Amy Spiller, John Ryan, and Maureen Harbolt electronically filed by Ms. Yvette L Yip on behalf of the Public Utilities Commission of Ohio