

In the Matter of the Review of the )  
Political and Charitable Spending by Ohio ) Case No. 20-1502-EL-UNC  
Edison Company, The Cleveland Electric )  
Illuminating Company, and the Toledo )  
Edison Company. )

Please take notice that the Office of the Ohio Consumers' Counsel ("OCC") will take the oral deposition of Santino Fanelli, Director of the Rates and Regulatory Affairs Department, FirstEnergy Service Company, consistent with OCC's rights under Ohio Adm. Code Rule 4901-1-21.

OCC seeks to conduct the deposition upon oral examination of this FirstEnergy Service Company employee related to, among other things, his sworn affidavit attached to the FirstEnergy Utilities' Response to the PUCO's Show Cause Entry of September 15, 2012. The deposition will take place via teleconference on October 22, 2020, at 10:00 a.m., or a date that is mutually agreeable between OCC and the deponent. The deposition will continue day-to-day thereafter until complete., The deponent will appear at that time and make himself available for telephonic deposition and will remain present until the deposition is completed.

Mr. Fanelli provided the sworn affidavit that was attached to FirstEnergy Utilities' Response to the PUCO's Show Cause Entry issued in this proceeding. Mr. Fanelli's deposition will be used to discover information related to FirstEnergy Utilities

Response to the PUCO's show cause order and matters including the use of funds collected from FirstEnergy Utility customers for political and charitable spending in support of tainted House Bill 6.

The deposition will be taken of the aforementioned deponent on relevant topics related to this proceeding, including but not limited to the deponent's filed affidavit, discovery requests by OCC and other parties and responses to such discovery provided by FirstEnergy Utilities. Mr. Fanelli will also be deposed on his knowledge and expertise with respect to 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.

Under Ohio Adm. Code Rules 4901-1-21(E), the deponent is requested to produce and make available to OCC, three hours prior to the deposition, the following documents:

1. The deponent's most recent C.V./resume.
2. Any documents referred to or relied upon with respect to the deponent's filed affidavit in this case.
3. All discovery responses that have been provided to OCC or any other party to this proceeding, including the PUCO Staff, and any discovery response that is due to parties on or prior to the scheduled deposition.

Respectfully submitted,

Bruce Weston (#0016973)  
Ohio Consumers' Counsel

/s/ Maureen R. Willis

Maureen R. Willis, Senior Counsel  
Counsel of Record (# 0020847)  
Angela D. O'Brien (#0097579)  
Assistant Consumers' Counsel

**Office of the Ohio Consumers' Counsel**

65 East State Street, 7<sup>th</sup> Floor  
Columbus, Ohio 43215  
Telephone [Willis]: (614) 466-9567  
Telephone [Obrien]: (614) 466-9531  
[Maureen.willis@occ.ohio.gov](mailto:Maureen.willis@occ.ohio.gov)  
[Angela.obrien@occ.ohio.gov](mailto:Angela.obrien@occ.ohio.gov)  
(Willing to accept service by e-mail)

Michael D. Dortch (0043897)  
Justin M. Dortch (00900048)  
KRAVITZ, BROWN, & DORTCH, LLC  
65 East State Street, Suite 200  
Columbus, Ohio 43215  
Phone (614) 464-2000  
Fax: (614) 464-2002  
E-mail: [mdortch@kravitzllc.com](mailto:mdortch@kravitzllc.com)  
[jdortch@kravitzllc.com](mailto:jdortch@kravitzllc.com)

Attorneys for the Ohio Consumers' Counsel

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of this Notice to Take Deposition was provided electronically to the persons listed below this 9th day of October 2020.

*/s/Maureen R. Willis*

Senior Counsel

Assistant Consumers' Counsel

The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

## **SERVICE LIST**

[John.jones@ohioattorneygeneral.gov](mailto:John.jones@ohioattorneygeneral.gov)  
[ccox@elpc.org](mailto:ccox@elpc.org)  
[rkelter@elpc.org](mailto:rkelter@elpc.org)  
[trhayslaw@gmail.com](mailto:trhayslaw@gmail.com)  
[leslie.kovacik@toledo.oh.gov](mailto:leslie.kovacik@toledo.oh.gov)  
[bojko@carpenterlipps.com](mailto:bojko@carpenterlipps.com)  
[bethany.allen@igs.com](mailto:bethany.allen@igs.com)  
[joe.oliker@igs.com](mailto:joe.oliker@igs.com)  
[michael.nugent@igs.com](mailto:michael.nugent@igs.com)  
[mkurtz@BKLawfirm.com](mailto:mkurtz@BKLawfirm.com)  
[kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)  
[kylerncohn@BKLawfirm.com](mailto:kylerncohn@BKLawfirm.com)

[bknipe@firstenergycorp.com](mailto:bknipe@firstenergycorp.com)  
[jang@calfee.com](mailto:jang@calfee.com)  
[khehmeyer@calfee.com](mailto:khehmeyer@calfee.com)  
[dborchers@bricker.com](mailto:dborchers@bricker.com)  
[dparram@bricker.com](mailto:dparram@bricker.com)  
[jspottswood@bricker.com](mailto:jspottswood@bricker.com)  
[mleppla@theOEC.org](mailto:mleppla@theOEC.org)  
[tdougherty@theOEC.org](mailto:tdougherty@theOEC.org)  
[ctavenor@theOEC.org](mailto:ctavenor@theOEC.org)  
[rdove@keglerbrown.com](mailto:rdove@keglerbrown.com)

Attorney Examiner:

[Gregory.price@puco.ohio.gov](mailto:Gregory.price@puco.ohio.gov)  
[Megan.addison@puco.ohio.gov](mailto:Megan.addison@puco.ohio.gov)  
[Jacky.stjohn@puco.ohio.gov](mailto:Jacky.stjohn@puco.ohio.gov)

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Summary: Notice Notice to Take Deposition and Request for Production of Documents by the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of Willis, Maureen R Mrs.