

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Santanna)
Natural Gas Corporation d/b/a Santanna Energy)
Services for Waivers of Certain Rules in Ohio) Case No. 23-0171-GE-WVR
Adm.Code 4901:1-21-06 and 4901:1-29-06 to)
Authorize Electronic Enrollment and Third-Party)
Verification by Digital Confirmation.)

**REPLY TO
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL'S MEMORANDUM CONTRA
MOTION FOR PROTECTIVE ORDER
BY
SANTANNA NATURAL GAS CORPORATION**

I. INTRODUCTION

To afford customers additional options for completing enrollment and verification, on March 1, 2023 and as amended on April 12, 2023, Santanna Natural Gas Corporation d/b/a Santanna Energy Services (Santanna) filed a pro-consumer application to waive certain Ohio Adm.Code 4901:1-21-06 and 4901:1-29-06 provisions governing the enrollment and third-party verification (TPV) processes for new customers enrolled through *door-to-door sales* in order to offer customers *additional options* to digitally/electronically complete and verify their enrollment for the customer's convenience (collectively, Application). Santanna's waiver request was only sought to the extent that the rules require wet signatures, audio recordings, or verbal TPVs when completing and confirming a door-to-door sale.¹ To clarify, Santanna is *not* seeking to waive any rules regarding telephonic sales or the TPVs conducted after a telephonic sale. Santanna included provisions contained in Ohio Adm.Code 4901:1-21-06(D)(2)(a) and 4901:1-29-06(E) in its waiver

¹ See Application.

request because Ohio Adm.Code 4901:1-21-06(D)(1)(h) requires that door-to-door electric sale TPVs “be conducted in accordance with paragraph (D)(2)(a) of rule 4901:1-21-06 of the Administrative Code,” and Ohio Adm.Code 4901:1-29-06(D)(6)(b) requires that door-to-door natural gas sale TPVs “be conducted in accordance with paragraph (E)(1) of rule 4901:1-29-06 of the Administrative Code.” Therefore, given that the door-to-door TPV rules specifically require that door-to-door TPVs be conducted in accordance with the requirements set forth in the telephonic TPV rule provisions, Santanna sought waiver of certain provisions of the telephonic TPV rules only to the extent that those requirements apply to door-to-door sales.

On March 29, 2023, the Office of the Ohio Consumers’ Counsel (OCC) filed its motion to intervene in this proceeding,² and on April 6, 2023, OCC served Santanna 36 interrogatories and 10 requests for production. The majority of these expansive discovery requests pertain to unrelated matters well beyond the scope of Santanna’s Application for waiver of certain provisions of the rules set forth in Ohio Adm.Code 4901:1-21-06 and 4901:1-29-06 to the extent that those rules require wet signatures, audio recordings, or verbal TPVs following a door-to-door sale.³

Rather than using the Public Utilities Commission of Ohio’s (Commission) discovery process to gather *relevant* information about Santanna’s Application for waiver, OCC’s irrelevant, overbroad, and inappropriate discovery requests serve only to cause undue expense and hardship, thus prejudicing Santanna. To protect itself from these improper and irrelevant requests, and to prevent OCC from abusing the discovery process by improperly soliciting information on matters wholly unrelated to Santanna’s Application for waiver, Santanna filed a Motion for Protective Order on May 5, 2023 (Motion).⁴

² See Motion to Intervene by the Office of the Ohio Consumers’ Counsel (March 29, 2023) (OCC Intervention).

³ See Santanna’s Responses to OCC’s Discovery Requests (Attachments A and B).

⁴ See Motion for Protective Order and Memorandum in Support by Santanna (May 5, 2023) (Santanna Motion).

As explained in the supporting memorandum accompanying the Motion, the majority of OCC's discovery requests are largely irrelevant and unrelated to Santanna's request to waive certain rules that appear to require wet signatures, audio recordings, or verbal TPVs when completing and confirming a door-to-door sale. Given that the discovery goes way beyond the limited waiver request, the discovery can only serve the purpose of unduly delaying this case and causing undue expense. The expansive discovery requests demand in-depth, detailed information on Santanna's third-party vendors and sales agents, compensation internally and to third parties, vendor contracts and processes, and related documents, all of which has nothing to do with Santanna's waiver request pending before the Commission. For example, OCC seeks information on Santanna's business practices in *other states*,⁵ Santanna's relationship with and its compensation of its sales agents,⁶ various third-party vendors,⁷ and numerous other questions that are little more than a poorly veiled fishing expedition for some evidence of potential or alleged wrongdoing, such as questions regarding Santanna's compliance with the Commission's rules and possible complaints.⁸

As the Commission's rules preclude this sort of abuse of the discovery process, Santanna appropriately sought protection pursuant to Ohio Adm.Code 4901-1-24(A), which allows a protective order to be issued when it is "necessary to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense." Specifically, Santanna requested that the Commission issue a protective order protecting Santanna from being required to respond to OCC discovery that is irrelevant, unduly burdensome, and competitively sensitive. Alternatively,

⁵ Attachment A, INT-01-003–INT-01-005 and INT-01-007–INT-01-008.

⁶ Attachment A, INT-01-009–INT-01-017.

⁷ Attachment A, INT-01-018, INT-01-022, INT-01-025, and INT-01-035.

⁸ Attachment A, INT-01-019–INT-01-020, INT-01-023, INT-01-027, INT-01-030, and RPD-01-005.

Santanna requested that the Commission issue an order preventing OCC's flagrant misuse of the discovery process by prohibiting irrelevant discovery requests that are outside the scope of this proceeding.

On May 22, 2023, OCC filed a memorandum contra Santanna's Motion.⁹ OCC asserted that granting the Motion would prevent OCC from obtaining discovery responses ostensibly necessary for OCC to provide comments on the Application for waiver, and that OCC's various questions were within the scope of this proceeding. However, OCC's own actions and pleadings make clear that this is not the case. Although Santanna was continuing to supplement its discovery responses as additional information became available and after a protective agreement was executed between the parties, OCC did not wait to receive additional information, but instead, filed its comments sixteen days prior to the comment deadline. OCC chose to not wait for additional information, OCC chose to not seek additional information, OCC chose to not wait for a Commission ruling on the protective order, OCC chose to not file a motion to compel, and OCC chose to file its comments early. OCC's actions clearly indicate that it had all the information necessary to submit comments on the Application pending before the Commission, which is a narrowly tailored request to waive certain provisions that would afford customers *additional options* to complete and confirm their enrollment electronically for the customer's convenience.

Pursuant to Ohio Adm.Code 4901-1-12(B)(2), Santanna hereby files its reply to OCC's memorandum contra. For the reasons set forth herein, the Commission should reject OCC's arguments and Santanna's Motion should be granted.

⁹ Memorandum Contra Santanna's Motion for Protective Order by OCC (May 22, 2023) (OCC Memo Contra).

II. DISCUSSION

A. OCC's Criticisms and Stated Need for Additional Discovery Responses are Unfounded and Should be Rejected.

OCC's decision to file comments *over two weeks* early on May 23, 2023 eviscerates the core of its argument that it requires further discovery responses from Santanna in order "to prepare its [. . .] comments" on Santanna's Application for waiver.¹⁰ In its memorandum contra, OCC insisted that it required these additional responses *before* it could file comments because Santanna has allegedly refused to answer "relevant" questions.¹¹ Yet, OCC's own actions demonstrate the falsity of this claim because it chose to file comments *two weeks* before the filing deadline.¹²

Contrary to OCC's repetitive claims that Santanna has been uncooperative during the discovery process, Santanna has been nothing but. Part of the reason that Santanna sought an extension on the comment filing deadline—which OCC also opposed—was to provide parties with additional time to resolve issues such as this very discovery dispute.¹³ Instead of filing comments two weeks early for the sole purpose of further attacking Santanna and lodging baseless accusations,¹⁴ OCC could have spent that time working with Santanna to resolve this purported discovery dispute amicably. Alternatively, if OCC was determined to be truculent, it could have simply taken advantage of the extended comment filing deadline and waited until the Commission resolved this alleged dispute.

¹⁰ OCC Memo Contra at 3. *See also* Comments of Legal Aid Society of Columbus, Legal Aid Society of Southwest Ohio, Office of The Ohio Consumers' Counsel, Ohio Poverty Law Center and Southeastern Ohio Legal Services (May 23, 2023) (Joint Comments).

¹¹ *Id.*

¹² *See* Joint Comments. *See also* Entry (May 15, 2023) extending the deadlines for parties to file initial and reply comments to June 8, 2023¹ and June 23, 2023, respectively.

¹³ *See* Motion for Extension of Comment Period by Santanna (May 11, 2023).

¹⁴ *See* Joint Comments.

However, OCC chose to forgo both of those options. Rather than seeking or awaiting a proper resolution to an alleged discovery dispute, OCC filed its comments *two weeks early*. This begs the question of *why* OCC was so insistent that it required additional discovery responses from Santanna before it could file its comments. Plainly, such additional responses were *not* necessary, since OCC had no trouble drafting and filing thirty-nine pages of comments.¹⁵

By filing its comments early, OCC has clearly demonstrated that it does *not* require further discovery responses from Santanna in order to prepare and file its comments in this case and that the only purpose of serving such discovery on Santanna was to cause undue burden and expense for Santanna. OCC's decision to file comments early rather than await a decision on whether or not it is entitled to receive these ostensibly necessary responses is but further evidence that the additional information OCC seeks is entirely outside the scope of this proceeding and unnecessary to the disposition of this case. Consequently, OCC's claims should be rejected outright and Santanna's protective order should be granted.

B. OCC's Discovery Requests are Beyond the Scope of this Proceeding.

Under Ohio Adm.Code 4901-1-16(B), parties “may obtain discovery of any matter, not privileged, which is *relevant to the subject matter of the proceeding*” or which is “reasonably calculated to lead to the discovery of admissible evidence.”¹⁶ In other words, the Commission's discovery rules do not provide a party with an unfettered license to probe into any topic it desires at any given moment in the proceeding. Rather, discovery is a vehicle by which parties may reasonably obtain information that is related to the merits of the case at issue. Thus, the relevant inquiry in determining Santanna's obligations to respond to OCC's discovery requests is whether

¹⁵ See Joint Comments.

¹⁶ Ohio Adm.Code 4901-1-16(B) (emphasis added).

the requests are *relevant* to the subject matter of the proceeding or otherwise reasonably calculated to lead to the discovery of admissible evidence. As explained further below, OCC's discovery requests are well outside the scope of this proceeding and therefore unreasonable and unduly burdensome.

The scope of this proceeding is limited. Santanna is seeking a waiver of various provisions of the rules set forth in Ohio Adm.Code 4901:1-21-06(D)(1)(a), (c), (d), (h)(i) through (iv), and (i) and (i)(ii), and 4901:1-29-06(D)(1), (3), (4), (6)(a) and (b)(i) through (iv), and (c)(ii), *only* to the extent that those rules require wet signatures, audio recordings, or verbal TPVs following a door-to-door sale. Additionally, Santanna is seeking a waiver of Ohio Adm.Code 4901:1-21-06(D)(2)(a)(i) through (viii) and (x) through (xi), (b)(ii) and (iii), and 4901:1-29-06(E)(1) to the extent that the door-to-door TPV rules specifically require that door-to-door TPVs be conducted in accordance with the requirements set forth in the telephonic TPV rule provisions. Therefore, pursuant to Ohio Adm.Code 4901-1-16(B), OCC's discovery requests should *only* include interrogatories and requests for production related to the waiver of the above-referenced rule provisions, or to Santanna's proposed digital/electronic enrollment and TPV processes.

As explained above, it should be noted that Santanna is *not* seeking to apply these waiver to TPVs conducted after a telephonic sale. This waiver, if granted, would only apply to digital signatures and verbal TPV requirements following a door-to-door sale. Santanna included certain telephonic TPV provisions in its Application for waiver because Ohio Adm.Code 4901:1-21-06(D)(1)(h) and 4901:1-29-06(D)(6)(b) require that door-to-door TPVs be consistent with telephonic TPVs.

Notwithstanding the limited waiver request and in disregard for the Commission's rules, OCC's discovery goes beyond the matters related to the narrowly defined scope of this proceeding.

As explained more fully in Santanna’s Motion, rather than only seeking information related to the waiver requests and whether Santanna may utilize digital/electronic enrollment and TPV processes in door-to-door sales, OCC demands information regarding Santanna’s operations in *other states*¹⁷ and competitively sensitive information about contracts with and compensation of third-party vendors and sales agents.¹⁸ Notably, the Commission does not even have jurisdiction over these matters or entities. The Commission does not regulate Santanna’s actions outside of Ohio, and Santanna’s business practices in other states have no bearing on the merits of its Application to waive certain rule provisions only applicable *in* Ohio. OCC itself acknowledges that the Commission does not regulate the third-party vendors that suppliers such as Santanna enter into contracts with.¹⁹ Despite this admission, in its memorandum contra, OCC insists that demanding information on these irrelevant matters is somehow critical to the full disposition of this case.

This abuse of the discovery process is exactly why Santanna sought a protective order from the Commission pursuant to Ohio Adm.Code 4901-1-24(A), which allows the Commission to “protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense” by issuing a protective order determining that “[d]iscovery not be had.” Both the Commission’s rules and precedent plainly indicate that discovery, ultimately, must be narrowly tailored to only seek information *relevant* to the subject matter of the case.²⁰ The *only* matters at issue in this case are whether or not Santanna may receive waiver of certain rules so that it can

¹⁷ Attachment A, INT-01-003–INT-01-005 and INT-01-007–INT-01-008.

¹⁸ Attachment A, INT-01-009–INT-01-017.

¹⁹ See Joint Comments.

²⁰ See Ohio Adm.Code 4901-1-16; *In the Matter of the Application of Cinergy Corp., on Behalf of the Cincinnati Gas & Electric Company, and Deer Holding Corp. for Consent and Approval of a Change of Control of The Cincinnati Gas & Electric Company*, Case No. 05-732-GA-MER, Entry on Rehearing ¶ 14 (December 7, 2005); *In the Matter of the Review of Chapters 4901-1, 4901-3, and 4901-9 of the Ohio Administrative Code*, Case No. 06-685-AU-ORD, Finding and Order at ¶ 7 (December 6, 2006).

offer customers additional options to complete enrollment and verification through digital/electronic means.

Throughout this proceeding, OCC has wrongfully accused Santanna of denying OCC its “rights of discovery to prepare its case and comments.”²¹ To this end, OCC filed not one but *two* different pleadings to which it attached a very few, selective portions of Santanna’s discovery responses.²² These selective responses were carefully chosen to offer the impression that Santanna has not been cooperating with OCC’s discovery efforts when the exact opposite is true. *See* Attachments A and B for a full and complete copy of Santanna’s discovery responses to OCC. Not only has Santanna answered many of OCC’s discovery requests to the best of its ability—which has imposed additional undue burden and expense—Santanna has also provided ample information to Staff.²³ Supplemental information was also provided to OCC and Staff.²⁴ *See* Attachments A and B for a full copy of Santanna’s discovery responses. Furthermore, Santanna provided a virtual demonstration of the digital/electronic door-to-door enrollment and TPV processes to both OCC and Staff and answered questions.

OCC has also attempted to portray Santanna as uncooperative by falsely asserting in its memorandum contra that OCC granted Santanna a one-week extension on the initial discovery due date.²⁵ Santanna very explicitly rejected OCC’s “offer” for an extension because it came with the caveat that Santanna must waive its right to offer objections and must substantively answer *all* discovery regardless of relevance.²⁶ Santanna then provided objections and discovery responses

²¹ OCC Memo Contra at 3. *See also* Joint Comments.

²² *Id.*

²³ *See* Attachments A and B.

²⁴ *Id.*

²⁵ OCC Memo Contra at 2.

²⁶ *See* Santanna Motion, Attachment B (Affidavit of Kimberly W. Bojko) and attached e-mail communications.

to OCC's first set of discovery as it was required to do and consistent with the Commission's rules by the discovery deadline.

OCC's ongoing mischaracterization of Santanna's actions in this proceeding is hardly a surprise given that it has dedicated significant portions of its many pleadings to painting Santanna as a bad actor without any evidence to support such baseless and harmful assertions.²⁷ In fact, a number of the interrogatories that Santanna objected to and that OCC insists are somehow relevant to this proceeding are little more than a poorly veiled fishing expedition for some evidence of potential or alleged wrongdoing, such as questions regarding Santanna's compliance with the Commission's rules.²⁸ The alleged wrongdoing simply does not exist and it is inappropriate for OCC to imply otherwise. The allegations and poorly misguided discovery questions are wildly outside the scope of this proceeding and are improper.

The reason for OCC's efforts to solicit irrelevant information from Santanna was revealed in the comments that it filed two weeks early. OCC does not simply wish to prevent *Santanna* from offering customers additional options for completing enrollment and verification (a convenience to said customers), it "advocate[s] for an outright ban of door-to-door marketing of energy services to consumers."²⁹ OCC admits that it has previously sought to convince the Commission to "*block the knock*," and its comments make clear that its true goal in this proceeding is to halt all door-to-door sales.³⁰ This waiver proceeding is *not* the proper venue for OCC's crusade, and OCC should not be allowed to flagrantly disregard Commission rules governing the

²⁷ See OCC Intervention; Reply to Santanna's Memorandum Contra OCC's Motion to Intervene by OCC (April 20, 2023); Memorandum Contra Santanna's Motion to Extend the Deadlines to File Comments by OCC (May 15, 2023); OCC's Memo Contra; and Joint Comments.

²⁸ Attachment A, INT-01-019-INT-01-020, INT-01-023, INT-01-027, INT-01-030, and RPD-01-005.

²⁹ Joint Comments at 8.

³⁰ See *id.*

scope of discovery simply because it does not approve of certain marketing and sales channels authorized by Ohio law.

As it has made clear throughout the discovery process, Santanna has no objection to OCC's interrogatories and requests for production that are *actually related* to the merits of its Application for waiver. The *only* discovery requests that Santanna seeks protection from are those that are irrelevant and invasive, and would require Santanna to unjustly expend significant resources to investigate and respond to without a relevant basis. As explained in its Motion, Santanna should not be forced to expend time and resources gathering and turning over information that is neither "relevant to the subject matter of the proceeding" nor "reasonably calculated to lead to the discovery of admissible evidence" simply because OCC desires to transform a waiver application proceeding into an improper rulemaking or Commission investigation into the merits of door-to-door sales.

III. CONCLUSION

OCC's continued demands for additional discovery responses from Santanna are unreasonable because such responses (1) are clearly no longer necessary since OCC has already filed its comments, and (2) are outside the scope of this proceeding and therefore improper. The discovery rights of parties and intervening parties in a Commission proceeding are not absolute, and the Commission has, on several occasions, made clear that discovery requests must be *relevant*.

Ohio Adm.Code 4901-1-24(A) allows the Commission to protect a party from discovery that is irrelevant and would impose an undue burden or expense. For all of the reasons discussed herein and in its original Motion and supporting memorandum, Santanna seeks protection from OCC's overbroad and irrelevant discovery requests that would subject Santanna to an unnecessary

burden and expense. Accordingly, Santanna reiterates its request for a protective order to relieve it from responding to the following discovery propounded by OCC and any other similar irrelevant, unduly burdensome, and competitively sensitive discovery: OCC-INT-01-001, -002, -004, -005, -007, -008, -009, -010, -011, -012, -013, -014, -015, -018, -019 (in part), -020 (in part), -022, -025, -035, and OCC-RPD-01-005 (in part).

The Commission's rules plainly require that discovery be issued only on matters that are "relevant to the subject matter of the proceeding." Therefore, OCC should be precluded from unjustly and unreasonably serving unduly burdensome and harassing discovery requests that are beyond the scope of the matters contained in Santanna's Application seeking a waiver.

Respectfully submitted,

/s/ Kimberly W. Bojko

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document also is being served via electronic mail on May 30, 2023 upon the parties listed below.

/s/ Kimberly W. Bojko

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**BEFORE
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Natural Gas Corporation d/b/a Santanna Energy)
Services for Waivers of Certain Rules in Ohio) Case No. 23-0171-GE-WVR
Adm.Code 4901:1-21-06 and 4901:1-29-06 to)
Authorize Electronic Enrollment and Third-Party)
Verification by Digital Confirmation.)

**SUPPLEMENTAL RESPONSES AND OBJECTIONS OF
SANTANNA NATURAL GAS CORPORATION
TO THE FIRST SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED BY THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

(May 5, 2023)

INTRODUCTION

Pursuant to Ohio Adm.Code 4901-1-16, 4901-1-17, 4901-1-18, 4901-1-19, and 4901-1-20, Santanna Natural Gas Corporation d/b/a Santanna Energy Services (Santanna), by and through counsel, hereby submits its Responses and Objections to the Office of the Ohio Consumers' Counsel's (OCC) First Set of Interrogatories and Requests for Production of Documents propounded upon Santanna in the above-captioned proceeding on April 6, 2023 (Discovery Requests).

To afford customers additional options for completing enrollment and verification, on March 1, 2023 and as amended on April 12, 2023, Santanna filed a pro-consumer application to waive certain Ohio Adm.Code 4901:1-21-06 and 4901:1-29-06 provisions governing the enrollment and third-party verification (TPV) processes for new customers enrolled through certain sales channels to the extent that the rules require wet signatures, audio recordings, or verbal TPVs (collectively, Application). Santanna's responses to these Discovery Requests are being provided subject to, and without waiver of, the general objections stated below and any specific

objections provided in response to an individual interrogatory, document request, or admission. The general objections are hereby incorporated by reference, as if fully set forth, in the individual responses made to each Discovery Request. Santanna's responses to these Discovery Requests are submitted without prejudice to, and without in any respect waiving, any general objections not expressly set forth herein.

The provision of any response below shall not waive Santanna's objections. The responses below, while based on diligent investigation and reasonable inquiry by Santanna and its counsel, reflect only the current state of Santanna's knowledge, understanding, and belief with respect to the matters about which the Discovery Requests seek information. Santanna's discovery and investigation are not yet complete and are continuing as of the date of the responses below. Santanna anticipates the possibility that it may discover additional information and/or documents, and without obligating itself to do so, Santanna reserves the right to continue its discovery and to modify or supplement the responses below with such pertinent information or documents as it may reasonably discover.

The responses below are made without prejudice to Santanna's right to rely upon or use subsequently discovered information or documents, or documents or information inadvertently omitted from the responses below as a result of mistake, error, or oversight. Santanna reserves the right to object, on appropriate grounds, to the use of such information and documents. The fact that Santanna, in the spirit of cooperation, has elected to provide information below in response to the OCC's Discovery Requests shall not constitute or be deemed to be a waiver of Santanna's objections. Santanna hereby fully preserves all of its objections to the Discovery Requests or the use of its responses to the Discovery Requests for any purpose whatsoever.

GENERAL OBJECTIONS

1. Santanna objects to each and every Discovery Request as improper, overly broad, harassing, and unduly burdensome to the extent that they purport to impose upon Santanna any obligations broader than those set forth in the Public Utilities Commission of Ohio's (Commission) rules or otherwise permitted by law. In part, the rules of discovery require that matters inquired into must be relevant to the subject matter of the proceeding, and must appear to be "reasonably calculated to lead to the discovery of admissible evidence." Ohio Adm.Code 4901-1-16(B) and 4901-1-24(A).

2. Santanna objects to each and every Discovery Request to the extent that it seeks information that is privileged by statute or common law, including privileged communications between attorney and client or attorney work product. Ohio Adm.Code 4901-1-16(B). Such material or information shall not be provided, and any inadvertent disclosure of material or information protected by the attorney-client privilege, the attorney work product doctrine, or any other privilege or protection from discovery is not intended and should not be construed to constitute a waiver, either generally or specifically, with respect to such information or material or the subject matter thereof.

3. Santanna objects to each and every Discovery Request to the extent that it improperly seeks or purports to require Santanna to provide documents and information not in Santanna's possession, custody, or control or could be more easily obtained through third parties or other sources. Ohio Adm.Code 4901-1-20(A)(1).

4. Santanna objects to each and every Discovery Request to the extent that it improperly seeks or purports to require the production of documents or information, which is not

relevant to the subject matter of the proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Ohio Adm.Code 4901-1-16(B).

5. Santanna objects to each and every Discovery Request to the extent that it improperly seeks or purports to require production of documents in a form other than how the documents are maintained in the regular course of business.

6. Santanna objects to each and every Discovery Request insofar as it requests the production of documents or information that are publicly available or already in OCC's possession, custody, or control. Ohio Adm.Code 4901-1-16(G) and 4901-1-20(D).

7. Santanna objects to each and every Discovery Request that seeks to obtain "all," "each," or "any" document to the extent that such requests are overly broad and unduly burdensome and seek information that is not relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

8. Santanna objects to each and every Discovery Request to the extent that it is not limited to a stated time period or identifies a stated period of time that is longer than is relevant for purposes of this proceeding; as such discovery is overly broad and unduly burdensome.

9. Santanna objects to each and every Discovery Request to the extent that it is vague, ambiguous, uses terms that are subject to multiple interpretations, but are not properly defined for purposes of these discovery requests, or otherwise provides no basis from which Santanna can determine what information is sought.

10. Santanna objects to each and every Discovery Request to the extent that it seeks information that contains or discloses: (a) trade secrets, unpublished financial data, internal business or product plans or other commercially sensitive or anti-competitive information of a non-public nature; (b) other proprietary research, development, marketing or commercial

information; or (c) other information of a confidential nature. Such information is protected from disclosure by well-established rules and precedent, and Santanna is under no obligation to produce such information.

11. The objections and responses contained herein are not intended, nor should they be construed, to waive Santanna's rights to object to other discovery requests involving or relating to the subject matter of these Discovery Requests, or to the responses or documents produced in response hereto.

SUPPLEMENTAL RESPONSES TO OCC'S INTERROGATORIES

OCC-INT-01-001. Pursuant to O.A.C. 4901-1-16(C), please identify each expert witness that Santanna expects to testify at any hearing in this proceeding.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-001 to the extent that it seeks information exempt from discovery under the trial preparation doctrine, work product doctrine, and/or the attorney-client privilege. See General Objection No. 2.

Subject to, and without waiver of, these objections, Santanna states as follows: At this time, Santanna has not determined which witnesses it will call to testify on its behalf as a hearing has not even been scheduled in this proceeding. To the extent necessary and required by the Commission's rules, Santanna will supplement its responses. See Ohio Adm.Code 4901-1-16, 4901-1-19, and 4901-1-20.

PREPARED BY: Counsel

OCC-INT-01-002. For each expert witness identified in your response to INT-01-001, please state the subject matter in this case on which the expert is expected to testify.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-002 to the extent that it seeks information exempt from discovery under the trial preparation doctrine, work product doctrine, and/or the attorney-client privilege. See General Objection No. 2.

Subject to, and without waiver of, these objections, Santanna states as follows: See Santanna's response to OCC-INT-01-001 above.

PREPARED BY: Counsel

OCC-INT-01-003. Referring to the Application on page 2, please identify the five states besides Ohio where Santanna offers or provides competitive retail electric or natural gas goods and services.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-003 as it is an incorrect statement of the Application. Santanna did not state that it operates in five states “besides Ohio.” Additionally, Santanna objects to this request as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Further, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Finally, Santanna objects that this request seeks information that is publicly available and/or already in OCC’s possession, custody, or control. See General Objection No. 6.

Subject to, and without waiver of, these objections, Santanna states as follows: On page 2 of the Application (as well as the Amended Application), Santanna states: “Santanna offers and provides competitive retail electric services (CRES) and competitive retail natural gas services (CRNGS) to customers in five states, including Ohio.” Thus, other than Ohio, Santanna provides competitive retail services in only four states. Those four states include Illinois, Indiana, Michigan, and Pennsylvania.

PREPARED BY: Counsel

OCC-INT-01-004. Please identify each state besides Ohio where Santanna markets and enrolls customers in competitive retail electric or natural gas goods and services using door-to-door solicitation.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-004 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: Currently, Santanna does not market or enroll customers in competitive retail electric or natural gas goods and services using door-to-door solicitation in any other state. See Response to Staff-DR-1-16.

OCC-INT-01-005. Please identify each state where Santanna offers a digital/electronic enrollment and third-party verifications through door-to-door solicitation.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-005 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: Currently, Santanna does not offer digital/electronic enrollment and TPV through door-to-door solicitations in any other state. See Response to Staff-DR-1-17.

OCC- INT-01-006. Please describe all methods used by Santanna to market and sell electric and natural gas [sic] consumers in Ohio.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-006 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7.

Subject to, and without waiver of, these objections, Santanna states as follows: Santanna markets and sells its products in Ohio through internet, telephone, and door-to-door solicitation.

PREPARED BY: Counsel

OCC-INT-01-007. For each of the various sales methods identified in response to INT-01-006, and in each jurisdiction where Santanna markets and sells competitive electric or natural gas goods and services, please describe how digital/electronic TPV is currently being used to verify customer enrollments.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-007 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7.

Subject to, and without waiver of, these objections, Santanna states as follows: As it relates to Ohio, which is the jurisdiction of this case where a waiver is sought, digital/electronic TPV is not currently being used as Santanna believes that a waiver of the Commission's rules may be necessary to utilize such verification and enrollment method.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Responses to Staff-DR-1 for additional information on Santanna's proposed digital/electronic enrollment and TPV processes.

OCC-INT-01-008. In each Santanna jurisdiction where digital/electronic TPV is currently being used as an option to verify customer enrollments through door-to-door solicitations, what percentage of customers selected the digital/electronic TPV option and what percentage of customers selected the telephonic TPV option?

RESPONSE: Objection. See General Objections. Additionally, see Santanna's objections and response to OCC-INT-01-007 above.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Santanna's Supplemental Response to OCC-INT-01-007 above.

OCC-INT-01-009. Please identify the total number of sales agents Santanna uses to market and sell competitive electric and natural gas goods and services in Ohio.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-009 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Responses to Staff-DR-1-4 for additional information with regard to door-to-door sales, which is the relevant method pertinent to the Application.

OCC-INT-01-010. Referring to the response to INT-01-009, please describe the employment relationship between Santanna and the sales agents (*e.g.*, direct, independent contractor, third-party vendor).

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-010 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Responses to Staff-DR-1 for additional information on Santanna's proposed digital/electronic enrollment and TPV processes.

OCC-INT-01-011. Referring to the response to INT-01-009, how many sales agents are directly employed by Santanna (as opposed to employees or representatives of third-party vendors)?

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-011 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: As of approximately May 1, 2023, [REDACTED] Santanna's services in Ohio via door-to-door solicitations, [REDACTED] directly employed by Santanna. See also Response to Staff-DR-1-4.

PREPARED BY: Counsel and Rachel Morris

CONFIDENTIAL

OCC-INT-01-012. Please identify how sales agents directly employed by Santanna are compensated (*e.g.*, hourly, commission) and how much compensation sales agents receive for each completed enrollment in competitive electric or natural gas goods and services.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-012 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7.

PREPARED BY: Counsel

OCC-INT-01-013. Please identify how sales agents who are not directly employed by Santanna are compensated (*e.g.*, hourly, commission) and how much compensation sales agents receive for each completed enrollment in Santanna's competitive electric or natural gas goods and services.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-013 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7.

PREPARED BY: Counsel

OCC-INT-01-014. If Santanna pays sales agents (directly employed or not) on a commission basis (either solely or in combination with an hourly rate), what is the commission rate paid?

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-014 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7.

PREPARED BY: Counsel

OCC-INT-01-015. If Santanna pays sales agents (directly employed or not) an hourly rate (either solely or in combination with commissions), what is the hourly rate paid?

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-015 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7.

PREPARED BY: Counsel

OCC-INT-01-016. How many sales agents does Santanna use in Ohio to market and sell competitive electric or natural gas using door-to-door solicitations?

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-016 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7.

Subject to, and without waiver of, these objections, Santanna states as follows: As of March 2023, Santanna utilizes one sales agent to market its services in Ohio via door-to-door solicitations.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: As of approximately May 1, 2023, Santanna utilizes [REDACTED] to market its services in Ohio via door-to-door solicitations. See also Response to Staff-DR-1-4.

PREPARED BY: Counsel and Rachel Morris

CONFIDENTIAL

OCC-INT-01-017. How many sales agents used by Santanna to market and sell competitive electric or natural gas in Ohio using door-to-door solicitations are directly employed by Santanna?

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-017 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7.

Subject to, and without waiver of, these objections, Santanna states as follows: None.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Santanna's Supplemental Response to OCC-INT-01-011 above.

OCC-INT-01-018. Please identify the name and business address of each third-party vendor that Santanna has used since 2021 to retain sales agents for the purpose of performing door-to-door solicitations in Ohio.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-018 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7.

PREPARED BY: Counsel

OCC-INT-01-019. For each of the methods Santana uses to market and sell competitive electric or natural gas goods and services, please describe how Santanna trains its sales agents (directly employed or not) to fully comply with the PUCO's rules regarding customer enrollment.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-019 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence, and seeks to obtain "each" such information or irrelevant documents. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request because it is overly broad, unduly burdensome, vague, and includes no reasonable temporal restrictions. See General Objection Nos. 1, 7, 8, and 9. Finally, Santanna objects that this request seeks information that is publicly available and/or already in OCC's possession, custody, or control. See General Objection No. 6.

Subject to, and without waiver of, these objections, Santanna states as follows: As it pertains to Santanna's waiver request and future enrollment and third-party verification (TPV) processes for new customers if the Application is approved, Santanna does not currently train any sales agents as the new processes have not been implemented. Nonetheless, see the Application for information on anticipated training on digital/electronic enrollment and TPV processes.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: As it pertains to Santanna's

waiver request and future enrollment and TPV processes for new customers if the Application is approved, see also Responses to Staff-DR-1 for additional information on Santanna's proposal.

OCC-INT-01-020. How does Santanna monitor and verify its sales agents' compliance with the PUCO's rules regarding customer enrollment?

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-020 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7. Finally, Santanna objects that this request seeks information that is publicly available and/or already in OCC's possession, custody, or control. See General Objection No. 6.

Subject to, and without waiver of, these objections, Santanna states as follows: As it pertains to Santanna's waiver request and future enrollment and TPV processes for new customers if the Application is approved, Santanna does not currently monitor or verify compliance as the new processes have not been implemented. Nonetheless, see the Application for information on anticipated monitoring and verification of compliance regarding digital/electronic enrollment and TPV processes.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: As it pertains to Santanna's waiver request and future enrollment and TPV processes for new customers if the Application is approved, see also Responses to Staff-DR-1 for additional information on Santanna's proposal.

OCC-INT-01-021. Do Santanna employees perform telephonic TPVs of customer enrollments through door-to-door sales or are the TPVs performed by a third-party vendor?

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-021 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7.

Subject to, and without waiver of, these objections, Santanna states as follows: Santanna is in compliance with the Commission's rules, which require independent third-party verifications to be performed for door-to-door sales.

PREPARED BY: Counsel

OCC-INT-01-022. Regarding the response to INT-01-021, if the telephonic TPVs are performed by a third-party vendor, please identify the name and business address of the vendor(s).

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-022 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7.

PREPARED BY: Counsel

OCC-INT-01-023. Since 2021, how many Santanna enrollments in competitive electric or natural gas goods and services were cancelled due to TPVs demonstrating noncompliance with the PUCO's rules?

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-023 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7. Finally, Santanna objects that this request is beyond the scope of the discovery rules and constitutes a fishing expedition in search of potential wrongdoing that is unrelated to the Application. See Ohio Adm.Code 4901-1-16.

Subject to, and without waiver of, these objections, Santanna states as follows: None as all of Santanna's TPVs are in compliance with the Commission's rules, and only properly completed TPVs would result in an enrollment.

PREPARED BY: Counsel

OCC-INT-01-024. Under Santanna's waiver proposal, will Santanna employees manage and oversee the digital/electronic TPV process, or will such management and oversight be performed by a third-party vendor?

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-024 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Finally, Santanna objects that this request seeks information that is publicly available and/or already in OCC's possession, custody, or control. See General Objection No. 6.

Subject to, and without waiver of, these objections, Santanna states as follows: See Application at 8. Santanna further responds that it will also have oversight over the digital/electronic TPV process.

PREPARED BY: Counsel

OCC-INT-01-025. Referring to paragraph 12 in the Application, please identify the third-party vendor who will develop the digital/electronic confirmation platform.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-025 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10.

PREPARED BY: Counsel

OCC-INT-01-026. Referring to paragraph 16(a) in the Application, how does the sales agent explain to consumers the option for and difference in the voice TPV as compared with the digital/electronic TPV?

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna also objects that this request seeks some information that is publicly available and/or already in OCC's possession, custody, or control. See General Objection No. 6.

Subject to, and without waiver of, these objections, Santanna states as follows: As it pertains to Santanna's waiver request and any future process related thereto if the Application is approved, see the Application at 5. Additionally, Santanna notes that its waiver request to implement a new process has not yet been approved. Santanna will continue to develop such new process if and when it is approved.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Responses to Staff-DR-1-11 for additional information on Santanna's proposed digital/electronic enrollment and TPV processes.

OCC-INT-01-027. How does Santanna verify that the sales agent has left the customer's residence prior to the occurrence of the TPV, and how does Santanna verify that the sales agent does not return?

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna also objects that this request seeks some information that is publicly available and/or already in OCC's possession, custody, or control. See General Objection No. 6.

Subject to, and without waiver of, these objections, Santanna states as follows: As it pertains to Santanna's waiver request and any future process related thereto if the Application is approved, see the Application at 6. Additionally, Santanna notes that its waiver request to implement a new process has not yet been approved. Santanna will continue to develop such new process if and when it is approved.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Responses to Staff-DR-1-6, 7, and 9 for additional information on Santanna's proposed digital/electronic enrollment and TPV processes.

OCC-INT-01-028. Please describe how Santanna will monitor that consumers were provided an option by the door-to-door sales agent to complete a telephonic/voice TPV or a digital/electronic TPV.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna also objects that this request seeks some information that is publicly available and/or already in OCC's possession, custody, or control. See General Objection No. 6.

Subject to, and without waiver of, these objections, Santanna states as follows: As it pertains to Santanna's waiver request and any future process related thereto if the Application is approved, see the Application at 5. Additionally, Santanna notes that its waiver request to implement a new process has not yet been approved. Santanna will continue to develop such new process if and when it is approved.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Responses to Staff-DR-1 generally and Staff DR-1-11 for additional information on Santanna's proposed digital/electronic enrollment and TPV processes.

OCC-INT-01-029. Please identify all software applications Santanna uses or plans to use to complete the digital/electronic enrollment and TPV process, including any geolocation positioning software used to determine the location of sales agents soliciting customers.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome and contains no reasonable temporal restrictions. See General Objection Nos. 1, 7, 8, and 9. Santanna also objects that this request seeks some information that is publicly available and/or already in OCC's possession, custody, or control. See General Objection No. 6.

Subject to, and without waiver of, these objections, Santanna states as follows: As it pertains to Santanna's waiver request and any future process related thereto if the Application is approved, see the Application at 6. Additionally, Santanna notes that its waiver request to implement a new process has not yet been approved. Santanna will continue to develop such new process if and when it is approved.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Responses to Staff-DR-1-6, 7, and 9 for additional information on Santanna's proposed digital/electronic enrollment and TPV processes.

OCC-INT-01-030. Please describe how Santanna maintains records of the TPVs that are performed telephonically, including how long the records are maintained. In addition, please identify any third-party vendors Santanna uses to maintain such records.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-030 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome and contains no reasonable temporal restrictions. See General Objection Nos. 1, 7, 8, and 9. Santanna also objects that this request seeks information that is publicly available and/or already in OCC's possession, custody, or control. See General Objection No. 6. Finally, Santanna objects that this request is beyond the scope of the discovery rules and constitutes a fishing expedition in search of potential wrongdoing that is unrelated to the Application. See Ohio Adm.Code 4901-1-16. Santanna objects that this request seeks some information that is publicly available and/or already in OCC's possession, custody, or control. See General Objection No. 6.

Subject to, and without waiver of, these objections, Santanna states as follows: As explained in the Application, Santanna is in compliance and plans to continue to be in compliance with the Commission's rules and requirements, including record retention rules.

PREPARED BY: Counsel

OCC-INT-01-031. Please describe how Santanna intends to maintain records of the TPVs that are performed using the digital/electronic platform, including how long the records will be maintained. In addition, please identify any third-party vendors Santanna plans to use to maintain such records.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-031 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7. Finally, Santanna objects that this request seeks some information that is publicly available and/or already in OCC's possession, custody, or control. See General Objection No. 6.

Subject to, and without waiver of, these objections, Santanna states as follows: As explained in the Application, Santanna intends to continue to be in compliance with the Commission's rules and requirements, including record retention rules.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Responses to Staff-DR-1 for additional information on Santanna's proposed digital/electronic enrollment and TPV processes.

OCC-INT-01-032. Referring to the Application in paragraph 13, the electronic/digital enrollment and signature would occur through an electronic device. Would Santanna provide the device, or would the enrollment be conducted through the consumer's digital device? If Santanna provides the device, please identify the type of device sales agents will use.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-032 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Finally, Santanna objects that this request seeks some information that is publicly available and/or already in OCC's possession, custody, or control. See General Objection No. 6.

Subject to, and without waiver of, these objections, Santanna states as follows: As it pertains to Santanna's waiver request and any future process related thereto if the Application is approved, see the Application at 4-5. Additionally, Santanna notes that its waiver request to implement a new process has not yet been approved. Santanna will continue to develop such new process if and when it is approved.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Responses to Staff-DR-1-8 for additional information on Santanna's proposed digital/electronic enrollment and TPV processes.

OCC-INT-01-033. Referring to the Application in paragraph 13, please describe how the consumer will provide the electronic signature. Will the electronic signature be typed, or signed with a stylus/index finger on a touch pad?

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-033 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Finally, Santanna objects that this request seeks some information that is publicly available and/or already in OCC's possession, custody, or control. See General Objection No. 6.

Subject to, and without waiver of, these objections, Santanna states as follows: As it pertains to Santanna's waiver request and any future process related thereto if the Application is approved, see the Application at 4-5. Additionally, Santanna notes that its waiver request to implement a new process has not yet been approved. Santanna will continue to develop such new process if and when it is approved.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Responses to Staff-DR-1 for additional information on Santanna's proposed digital/electronic enrollment and TPV processes.

OCC-INT-01-034. With the geolocation feature, how far from the customer's location does the salesperson need to be before the customer can begin the TPV?

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna also objects that this request seeks some information that is publicly available and/or already in OCC's possession, custody, or control. See General Objection No. 6.

Subject to, and without waiver of, these objections, Santanna states as follows: As it pertains to Santanna's waiver request and any future process related thereto if the Application is approved, see the Application at 6. Additionally, Santanna notes that its waiver request to implement a new process has not yet been approved. Santanna will continue to develop such new process if and when it is approved.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Responses to Staff-DR-1 for additional information on Santanna's proposed digital/electronic enrollment and TPV processes.

OCC-INT-01-035. Identify by name and business address the “...sophisticated electronic device vendor partner...” that is referenced in paragraph 23 of the Application to process enrollments and collect customers’ electronic signatures.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-035 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10.

PREPARED BY: Counsel

OCC-INT-01-036. Besides using geolocation software, please describe how Santanna will monitor that the door-to-door sales agent has left the property before the consumer begins the TPV process.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-036 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7. See General Objection No. 10. Santanna also objects that this request seeks some information that is publicly available and/or already in OCC's possession, custody, or control. See General Objection No. 6.

Subject to, and without waiver of, these objections, Santanna states as follows: As it pertains to Santanna's waiver request and any future process related thereto if the Application is approved, see the Application at 6. Additionally, Santanna notes that its waiver request to implement a new process has not yet been approved. Santanna will continue to develop such new process if and when it is approved.

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Responses to Staff-DR-1 for additional information on Santanna's proposed digital/electronic enrollment and TPV processes.

REQUESTS FOR PRODUCTION OF DOCUMENTS

OCC-RPD-01-001. Please provide copies of all formal and informal requests (*e.g.*, interrogatories, data requests) made to the Company by the Commission, the PUCO Staff, and the PUCO's Attorneys General in this proceeding, and the Company's responses to those requests.

RESPONSE: Objection. See General Objections. Santanna objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10.

Subject to, and without waiver of, these objections, Santanna states as follows: Santanna has no responsive documents at this time.

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Responses to Staff-DR-1 dated May 5, 2023, which were provided to OCC concurrently with Staff.

OCC-RPD-01-002. Please provide copies of all documents and workpapers provided to or by the Commission, the PUCO Staff, and/or the PUCO's Attorneys General in connection with this proceeding, including schedules in Excel format.

RESPONSE: Objection. See General Objections. Santanna objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10.

Subject to, and without waiver of, these objections, Santanna states as follows: Santanna has no responsive documents at this time.

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Responses to Staff-DR-1 dated May 5, 2023, which were provided to OCC concurrently with Staff.

OCC-RPD-01-003. Please provide copies of all discovery received by the Company from other parties in this proceeding, and the Company's response to that discovery.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-RFP-01-003 to the extent the request seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10.

Subject to, and without waiver of, these objections, Santanna states as follows: Santanna has no responsive documents at this time.

OCC-RPD-01-004. Please provide copies of all Communications (*e.g.*, email, memos) related to this proceeding between the Company and the Commission, the PUCO Staff, and/or the PUCO's Attorneys General.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-RFP-01-004 to the extent the request seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10.

Subject to, and without waiver of, these objections, Santanna states as follows: Santanna has no responsive documents at this time.

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See attached Santanna's Supplemental RPD – OCC First Set.

OCC-RPD-01-005. Please provide a copy of all materials that Santanna uses to train its sales agents to comply with the PUCO's rules for enrolling customers.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-RFP-01-005 to the extent the request seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Santanna further objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Responding further, Santanna objects to the request to the extent it seeks to obtain information on an "all," "each," "any," or "ever" basis as such requests are vague, overly broad and unduly burdensome, and contains no reasonable temporal restrictions. See General Objection Nos. 1, 7, 8, and 9.

Subject to, and without waiver of, these objections, Santanna states as follows: As it pertains to Santanna's waiver request and any future process related thereto if the Application is approved, Santanna states that its waiver request to implement a new process has not yet been approved. Therefore, at this time, no responsive materials exist.

OCC-RPD-01-006. Please provide a copy of the script that is used by Santanna's sales agents informing consumers of the option to complete the third-party verification by voice or digital/electronic confirmation.

RESPONSE: Objection. See General Objections. Santanna objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10.

Subject to, and without waiver of, these objections, Santanna states as follows: As it pertains to Santanna's waiver request and any future process related thereto if the Application is approved, no such scripts are currently being used by sales agents as Santanna's waiver request to implement a new process has not yet been approved. Therefore, no responsive materials exist.

OCC-RPD-01-007. Please provide a copy of the text or e-mail that will be sent to customers if they choose a digital/electronic TPV.

RESPONSE: Objection. See General Objections. Santanna objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10.

Subject to, and without waiver of, these objections, Santanna states as follows: As it pertains to Santanna's waiver request and any future process related thereto if the Application is approved, no such text or emails currently exists as Santanna's waiver request to implement a new process has not yet been approved. Therefore, at this time, no responsive materials exist.

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Responses and Attachments to Staff-DR-1.

OCC-RPD-01-008. Please provide a copy of any contract that customers will be provided as part of the enrollment process described in the Application.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-RFP-01-008 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome, and contains no reasonable temporal restrictions. See General Objection Nos. 1, 7, 8, and 9.

Subject to, and without waiver of, these objections, Santanna states as follows: As it pertains to Santanna's waiver request and any future process related thereto if the Application is approved, Santanna states that its waiver request to implement a new process has not yet been approved. However, as explained in the Application at 5, Santanna does not intend to create a new or different contract as a result of the waiver request.

OCC-RPD-01-009. Please provide a log of the digital prompts or questions that Santanna plans to use when conducting digital/electronic TPVs.

RESPONSE: Objection. See General Objections. Santanna objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10.

Subject to, and without waiver of, these objections, Santanna states as follows: As it pertains to Santanna's waiver request and any future process related thereto if the Application is approved, no such log currently exists as Santanna's waiver request to implement a new process has not yet been approved. Therefore, at this time, no responsive materials exist.

OCC-RPD-01-010. Please provide a copy of the “welcome package” that customers will be provided as part of the enrollment process described in paragraph 16(f) of the Application.

RESPONSE: Objection. See General Objections. Specifically, Santanna objects to OCC-RFP-01-010 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10. Santanna further objects to the request on the grounds that it is overly broad and unduly burdensome. See General Objection Nos. 1 and 7.

Subject to, and without waiver of, these objections, Santanna states as follows:

Subject to, and without waiver of, these objections, Santanna states as follows: As it pertains to Santanna’s waiver request and any future process related thereto if the Application is approved, Santanna states that its waiver request to implement a new process has not yet been approved. However, as explained in the Application at 6, Santanna does not intend to create a new or different “welcome package” as a result of the waiver request.

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Responses and Attachments to Staff-DR-1.

As to objections,

/s/ Kimberly W. Bojko

Kimberly W. Bojko (0069402) (Counsel of Record)

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(willing to accept service by email)

Counsel for Santanna Natural Gas Corporation

Santanna Energy Services
Case No. 23-0171-GE-WVR
OCC First Set of Discovery Responses

OCC-INT-01-025. Referring to paragraph 12 in the Application, please identify the third-party vendor who will develop the digital/electronic confirmation platform.

RESPONSE (April 26, 2023): Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-025 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10.

SUPPLEMENTAL RESPONSE (May 15, 2023) (CONFIDENTIAL): Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: the third-party vendor who Santanna is currently working with to develop its proposed digital/electronic confirmation platform is [REDACTED]. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PREPARED BY: Counsel

CONFIDENTIAL

Santanna Energy Services
Case No. 23-0171-GE-WVR
OCC First Set of Discovery Responses

OCC-INT-01-035. Identify by name and business address the “...sophisticated electronic device vendor partner...” that is referenced in paragraph 23 of the Application to process enrollments and collect customers’ electronic signatures.

RESPONSE (April 26, 2023): Objection. See General Objections. Specifically, Santanna objects to OCC-INT-01-035 as it seeks information that is not relevant to the subject matter of the Application filed in this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. See General Objection Nos. 1, 4, 7, and Ohio Adm.Code 4901-1-16(B). Additionally, this request seeks information that is otherwise outside the scope of Ohio Adm.Code 4901-1-16 and the Application. See General Objection No. 4. Santanna also objects to the extent that OCC is inquiring into information that is confidential, trade secret, and/or competitively sensitive information. See General Objection No. 10.

SUPPLEMENTAL RESPONSE (May 15, 2023) (CONFIDENTIAL): Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: See Santanna’s response to OCC-INT-01-025 above. Additionally, [REDACTED] business address is [REDACTED].

PREPARED BY: Counsel

CONFIDENTIAL

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Case No(s). 23-0171-GE-WVR

Summary: Reply Santanna Reply OCC's Memo Contra Santanna's Motion for Protective Order (23-171) electronically filed by Mrs. Kimberly W. Bojko on behalf of Santanna Natural Gas Corporation.