

**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.)

**MEMORANDUM CONTRA MOTION TO COMPEL
OF THE OFFICE OF THE OHIO CONSUMERS' COUNSEL
BY
SANTANNA NATURAL GAS CORPORATION**

Pursuant to Ohio Adm.Code 4901-1-12(B)(1), Santanna Natural Gas Corporation d/b/a Santanna Energy Services (Santanna) hereby files its memorandum contra the Office of the Ohio Consumers' Counsel's (OCC) Motion to Compel Discovery (OCC's Motion) in the above-captioned proceeding before the Public Utilities Commission of Ohio (Commission). As explained herein and as explained in Santanna's Motion for Protective Order, OCC's Motion should be denied. As explained in several Santanna pleadings, a Protective Order is imperative in order to prevent OCC from continuing to harass Santanna and from continuing to seek this irrelevant data, including through the instant Motion to Compel filed by OCC.

I. INTRODUCTION

OCC—the advocate for residential utility customers—continues to oppose affording those same customers additional options for completing enrollment and third-party verification (TPV).¹ Advocating against providing additional options for customers, that they themselves can choose,

¹ See 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 at 3 and 8 (May 23, 2023) (Joint Comments)

is counter intuitive. Giving customers the *option* of making a choice to switch suppliers and of making a choice to do so at the customer's personal convenience through digital/electronic means if and when the customer so chooses is favorable to customers. But rather than supporting Santanna's efforts to offer customers *additional options* for completing and verifying their enrollment in the context of door-to-door sales, OCC wants to force customers to immediately answer a phone call and answer verbal questions even if the timing is not convenient for that customer.

But OCC's opposition goes beyond challenging the optionality requested with the waiver, and OCC seeks to completely eliminate door-to-door sales as a means for enrolling customers. OCC stated that it "advocate[s] for an outright ban of door-to-door marketing of energy services to consumers" and that "the rules should be changed to outright ban door-to-door sales."²

To accomplish its main goal in this case (i.e., ban door-to-door sales), OCC seeks discovery about door-to-door vendors, contracts, compensation, complaints, and compliance issues, all wholly unrelated to Santanna's narrow request for waiver of certain Ohio Adm.Code 4901:1-21-06(D)(1) and 4901:1-29-06(D) provisions governing the enrollment and TPV processes for new customers enrolled through door-to-door sales (Application).³ Discovery, it should be noted, that Staff did not deem similarly necessary in order to evaluate Santanna's Application and recommend approval.⁴ Plainly, the discovery that OCC seeks is not actually needed to evaluate Santanna's Application, and that is because said discovery is about issues unrelated to Santanna's Application.

² *Id.* (emphasis removed).

³ See Application filed on March 1, 2023 and as amended on April 12, 2023 and June 5, 2023.

⁴ Staff Comments at 5 (June 8, 2023).

Moreover, OCC's Motion⁵ was filed while Santanna's own Motion for Protective Order⁶ on these very same matters remains pending before the Commission. OCC's decision to file a motion to compel while a motion for protective order is still pending is another example of OCC imposing on Santanna additional undue burden and expense in this proceeding and further demonstrates why a protective order is necessary.

The Commission should deny OCC's Motion and grant Santanna's Motion for a Protective Order to protect Santanna from OCC's continued harassing and costly tactics that are irrelevant to the case pending before the Commission. The above-captioned case is a waiver proceeding. All Santanna seeks to do is provide customers with an additional option for completing and verifying their enrollment through digital/electronic means within the limited context of door-to-door sales. The Commission should not allow OCC to transform this waiver proceeding into a fishing expedition as part of its ongoing efforts to ban all door-to-door sales.

This waiver proceeding is *not* the proper venue for OCC's crusade against door-to-door sales, and OCC should not be allowed to flagrantly disregard the Commission rules governing the scope of discovery in one supplier's waiver application case simply because OCC does not like a particular marketing and sales channel authorized by Ohio law. OCC has failed to demonstrate how any of the requested discovery is even tangentially related to Santanna's Application for waiver pending before the Commission. Therefore, OCC's Motion should be denied, and Santanna's Motion for Protective Order should be granted.

⁵ Motion to Compel by the Office of the Ohio Consumers' Counsel (May 31, 2023) (OCC Motion).

⁶ Motion for Protective Order by Santanna (May 5, 2023) (Santanna Motion).

II. ARGUMENT

OCC's Motion places the following interrogatories and requests for production of documents at issue:

<u>OCC Discovery Request</u>	<u>Description</u>	<u>Rationale for Objection</u>
OCC-INT-01-012	Request for information on directly employed sales agents' compensation	Irrelevant Outside the Scope Competitively Sensitive Information Overly Broad and Unduly Burdensome
OCC-INT-01-013	Request for information on third-parties' employed sales agents' compensation	Irrelevant Outside the Scope Competitively Sensitive Information Overly Broad and Unduly Burdensome
OCC-INT-01-014	Request for information on sales agents' commission rate	Irrelevant Outside the Scope Competitively Sensitive Information Overly Broad and Unduly Burdensome
OCC-INT-01-015	Request for information on sales agents' hourly rate	Irrelevant Outside the Scope Competitively Sensitive Information Overly Broad and Unduly Burdensome
OCC-INT-01-018	Request for information on third-party vendors	Irrelevant Outside the Scope Competitively Sensitive Information Overly Broad and Unduly Burdensome
OCC-INT-01-019	Request for information on how Santanna trains sales agents generally	Irrelevant Outside the Scope Competitively Sensitive Information Overly Broad and Unduly Burdensome Information Publicly Available and/or in OCC Possession
OCC-INT-01-020	Request for information on how Santanna monitors sales agents generally	Irrelevant Outside the Scope Competitively Sensitive Information Overly Broad and Unduly Burdensome Information Publicly Available and/or in OCC Possession
OCC-INT-01-022	Request for the identity of the <i>telephonic</i> TPV vendor	Irrelevant Outside the Scope Competitively Sensitive Information Overly Broad and Unduly Burdensome
OCC-RPD-01-005	Request for materials Santanna uses to train sales agents generally	Responsive material does not yet exist because TPV process has not yet been approved

OCC-RPD-01-008	Request for customer contracts generally	Irrelevant Outside the Scope Competitively Sensitive Information Overly Broad and Unduly Burdensome
OCC-RPD-01-009	Request for log of digital prompts and questions for digital/electronic TPV	Confidential, trade secret, competitively sensitive
OCC-RPD-01-010	Request for Santanna’s “welcome package”	Irrelevant Outside the Scope Competitively Sensitive Information Overly Broad and Unduly Burdensome

As seen in the chart above and has been discussed at length in both Santanna’s Motion for Protective Order⁷ and Santanna’s reply to OCC’s memorandum contra Santanna’s Motion for Protective Order (Santanna’s Reply),⁸ none of these discovery requests are relevant to the subject matter of the proceeding or reasonably calculated to lead to the discovery of admissible.⁹ Nonetheless, partial responses were provided to INT-019, INT-020, RPD-010. Santanna also stated that responsive documents simply did not exist for some of the requests.

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.”¹⁰ In other words, contrary to what OCC believes,¹¹ 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 unprivileged information that is related to the

⁷ See Santanna’s Motion for Protective Order.

⁸ See Santanna’s Reply to OCC’s Memo Contra Santanna’s Motion for Protective Order (May 30, 2023) (Santanna’s Reply).

⁹ Santanna’s Motion for Protective Order at 3; Santanna’s Reply at 4; see Ohio Adm.Code 49001-1-16(B).

¹⁰ Ohio Adm.Code 4901-1-16(B) (emphasis added).

¹¹ See OCC’s Motion.

merits of the case at issue. Thus, the relevant inquiry in determining Santanna's obligations to respond to OCC's discovery requests is whether the requests are privileged, relevant to the subject matter of the proceeding, or otherwise reasonably calculated to lead to the discovery of admissible evidence. As discussed below, the subject discovery requests meet none of these criteria established by the Commission's discovery rules.¹²

As explained in Santanna's Motion for Protective Order and Santanna's Reply, the scope of this proceeding is limited.¹³ 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) and (c)(ii), and *only* to the extent that these rules require wet signatures, audio recordings, or verbal TPVs following a door-to-door sale. Additionally, 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 rules, Santanna is seeking waiver of Ohio Adm.Code 4901:1-21-06(D)(2)(a)(i) through (viii) and (x) through (xi), and 4901:1-29-06(E)(1) only to the extent that these rules are referenced for the purpose of door-to-door TPV. 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.¹⁴

Despite the limited scope of Santanna's waiver request, and in flagrant disregard for the Commission's rules, the discovery requests that OCC seeks to compel go well beyond the matters

¹² Santanna's Motion for Protective Order at 10. *See also* Santanna's Reply at 6-7.

¹³ *Id.* at 10-11. *Id.* at 7.

¹⁴ *Id.* at 10-11. *Id.* at 7.

related to the narrowly defined scope of this proceeding.¹⁵ As explained more fully in Santanna's Motion for Protective Order, rather than only seeking information related to Santanna's waiver request, OCC demands information regarding Santanna's operations in *other states*¹⁶ and competitively sensitive information about contracts with and compensation of third-party vendors and sales agents.¹⁷ Notably, the Commission does not even have jurisdiction over these matters or entities. OCC itself even acknowledges that the Commission does not regulate the third-party vendors that suppliers, such as Santanna, enter into contracts with, but yet OCC still seeks the privileged, irrelevant information.¹⁸

OCC's Motion claims that demanding information on these privileged, irrelevant matters is somehow necessary for the full disposition of this case.¹⁹ Yet, OCC's own actions demonstrate the falsity of this claim because it chose to file comments *two weeks* before the filing deadline and before attempting to compel production of the information.²⁰ Instead of filing comments two weeks early for the sole purpose of further attacking Santanna and lodging baseless accusations,²¹ OCC could have spent that time working with Santanna to resolve this purported discovery dispute amicably. Alternatively, OCC could have simply waited until the Commission resolved this alleged discovery dispute. OCC's decision to forgo both options and instead file early comments further demonstrates that the additional information OCC seeks is entirely outside the scope of this

¹⁵ Santanna's Motion at 11.

¹⁶ Santanna's Motion, Attachment A, INT-01-003–INT-01-005 and INT-01-007–INT-01-008.

¹⁷ Santanna's Motion, Attachment A, INT-01-009–INT-01-017.

¹⁸ OCC's Motion at 7.

¹⁹ *See id.*

²⁰ Joint Comments.

²¹ *See* Joint Comments.

proceeding and unnecessary to the disposition of this case. And OCC's comments reveal its true motives: to "block the knock."²²

In contrast, in its comments recommending that the Commission approve Santanna's Application, Staff made no mention of needing any additional information from Santanna and in fact noted that the Application appears to provide the "valuable safeguards that protect consumers' interests."²³ Santanna has provided parties with the information necessary for the full disposition of this case, *and* any demands for other privileged, irrelevant information serves no purpose other than imposing additional burden and expense upon Santanna.

OCC's continual abuse of the discovery process is exactly why Santanna seeks 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 require discovery, to be narrowly tailored to only seek unprivileged information *relevant* to the subject matter of the case.²⁴ The *only* matter at issue in this case is whether Santanna may receive a waiver of certain rules so that it can offer customers additional options to complete enrollment and verification through digital/electronic means.

²² Joint Comments at 8 (emphasis removed).

²³ Staff Comments at 4.

²⁴ Santanna's Motion at 7-9. *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).

Contrary to OCC's repetitive claims that Santanna has been uncooperative during the discovery process,²⁵ Santanna has been nothing but. From the beginning, Santanna has sought to resolve this dispute amicably, but OCC has insisted on remaining truculent, and through its numerous pleadings has attempted to portray Santanna as uncooperative via misleading documentation and even outright falsehoods.²⁶ For example, OCC's claim that it agreed to grant Santanna a one-week extension to respond to its first set of discovery is untrue.²⁷ OCC's so-called "agreement" to grant an extension came with the caveat that Santanna must waive its rights to offer objections and must substantively answer *all* discovery regardless of relevance.²⁸ As can be seen in Attachment B of Santanna's Motion for Protective Order, Santanna explicitly rejected OCC's "offer," stating that it "cannot agree to [OCC's] stipulations."²⁹ Santanna has also responded to numerous discovery requests from OCC and Staff, supplemented its discovery as new information became available and at the specific request of OCC, and has provided the parties with a presentation of its proposal and answered questions. OCC's omission of what Suburban has provided and done with regard to discovery and its failure to attach the complete set of discovery responses is disingenuous.³⁰

As discussed in both Santanna's Motion for Protective Order and Santanna's Reply, throughout this proceeding, OCC has continually and deliberately mischaracterized Santanna's actions in order to paint Santanna as a bad actor without any evidence to support such baseless and

²⁵ OCC's Motion at 2. *See also* Joint Comments; OCC's Memorandum Contra Santanna's Motion for Protective Order (May 22, 2023) (OCC's Memo Contra – Protective Order); and OCC's Memorandum Contra Santanna's Motion to Extend the Deadlines to File Comments (May 12, 2023) (OCC's Memo Contra – Extension).

²⁶ *See* Santanna's Reply.

²⁷ OCC's Motion.

²⁸ *See* Santanna's Motion, Attachment B (Affidavit of Kimberly W. Bojko) and attached e-mail communications.

²⁹ *Id.*

³⁰ *See* Attachments A and B.

harmful assertions.³¹ OCC's Motion is but the most recent in a long line of filings that serve the sole purpose of imposing additional burden and expense upon Santanna. By filing a motion to compel when Santanna's Motion for Protective Order remains pending, OCC is forcing Santanna to respond in order to protect itself from OCC's continued harassment.

As also explained in Santanna's Motion for Protective Order and Santanna's Reply, Santanna should not be forced to expend yet more 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

For all the reasons set forth herein, and for all the reasons set forth in Santanna's Motion and Santanna's Reply, OCC's Motion should be denied. Santanna seeks a protective order from the very requests OCC now seeks to compel, and the fact that OCC chose to file such a motion *before* the Commission ruled on Santanna's Motion for Protective Order demonstrates quite starkly that OCC's sole purpose in filing its motion to compel is imposing additional undue burden and expense on Santanna. Therefore, OCC's Motion should be denied in its entirety.

³¹ See OCC's Motion; Joint Comments; OCC's Memo Contra – Protective Order; OCC's Memo Contra – Extension; and Motion to Intervene by the Office of the Ohio Consumers' Counsel (March 29, 2023).

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 June 15, 2023 upon the parties listed below.

/s/ Kimberly W. Bojko

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**BEFORE
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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.)

**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: [REDACTED]

[REDACTED]

[REDACTED]. 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: [REDACTED]

[REDACTED]

[REDACTED]

PREPARED BY: Counsel

SUPPLEMENTAL RESPONSE: Subject to, and without waiver of, the previously asserted objections set forth above, Santanna responds further as follows: [REDACTED]

[REDACTED]

[REDACTED]. 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]

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]

[REDACTED].

PREPARED BY: Counsel

CONFIDENTIAL

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

Summary: Memorandum Santanna Memo Contra OCC's Motion to Compel
Discovery electronically filed by Ms. Emma Y. Easley on behalf of Santanna Natural
Gas Corporation.