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File #: 161587

February 3, 2016

VIA E-MAIL & REGULAR MAIL

Honorable Jeffrey Watson
PA Public Utility Commission
Suite 220, Piatt Place
301 Fifth Avenue
Pittsburgh, PA 15222

Re: Whemco-Steel Castings, Inc. v. Duquesne Light Company
Docket No. C-2014-2459527

Dear Judge Watson:

This letter provides notice to Your Honor and confirms with Whemco-Steel Castings, Inc.'s ("Whemco") counsel that Duquesne Light Company ("Duquesne Light") will depose Whemco's witnesses Ms. Pamela Polacek on February 9, 2016 and Mr. Christian Slingluff and Mr. Robert Rosenthal on February 10, 2016 at the Post & Schell P.C. offices located at 17 North Second Street, 12th Floor, Harrisburg, Pennsylvania beginning at 10:00 a.m. on each day. Whemco's counsel has confirmed to Duquesne Light's counsel that all of Whemco's witnesses will voluntarily attend and participate in the depositions without the need for a subpoena or application. In addition, Ms. Polacek, Mr. Rosenthal and Mr. Slingluff will voluntarily bring requested documents to the deposition, excluding documents considered to be privileged by Whemco.

The deposition of Pamela C. Polacek, Esquire, will inquire into factual matters relating to (i) the Formal Complaint filed by Whemco in the above-referenced matter; (ii) preparation of the Complaint; (iii) the statements made in Ms. Polacek's affidavit; (iv) preparation of the Affidavit; (v) statements made in Ms. Polacek's Direct Testimony; (vi) Ms. Polacek's review of Duquesne Light's filing in the DSP IV Proceeding and Ms. Polacek's participation in that proceeding; (vii) the extent of Ms. Polacek's communications (written and oral) with Whemco regarding the DSP IV Proceeding, including all documents exchanged between Ms. Polacek and Whemco; (viii) Ms. Polacek's experience with default service proceedings and distribution-related proceedings and the types of matters appropriately addressed therein; (ix) Ms. Polacek's involvement in Duquesne Light's 2010 Base Rate proceeding at Docket No. R-2010-2179522; and (x) such other matters reasonably related to the inquiries specified in subparagraph (i)-(ix) above. All of

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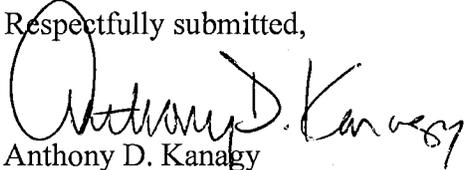
these issues are directly relevant and pertinent to Whemco's Formal Complaint, Whemco's request for relief and Duquesne Light's defense in this proceeding.

Duquesne Light requests that Ms. Polacek bring to the deposition and produce the following: All documents pertaining to (i) the Formal Complaint filed by Whemco in the above-referenced matter, excluding documents considered to be privileged by Whemco; (ii) preparation of the Complaint excluding documents considered to be privileged by Whemco; (iii) the statements and judgments made in Ms. Polacek's affidavit; (iv) preparation of the Affidavit excluding prior drafts; (v) Ms. Polacek's Direct Testimony; (vi) Ms. Polacek's review of Duquesne Light's filing in the DSP IV Proceeding and Ms. Polacek's participation in that proceeding; (vii) the extent of Ms. Polacek's communications (written and oral) with Whemco regarding the DSP IV Proceeding, including all documents exchanged between Ms. Polacek and Whemco; (viii) the Duquesne Light 2010 base rate proceeding; and (ix) such other matters reasonably related to the inquiries specified in subparagraphs (i)-(viii) above. This paragraph is not intended to include documents that are in the public file with the Pennsylvania Public Utility Commission, or are privileged.

The deposition of Christian Slingluff will inquire into matters relating to (i) the Formal Complaint filed by Whemco in the above-referenced matter; (ii) the statements made in Mr. Slingluff's affidavit; (iii) the statements made in Mr. Slingluff's Direct Testimony; (iv) Whemco's receipt of electric service at the Midland Facility; (v) the DSP IV Proceeding and the settlement of that proceeding; (vi) the elimination of Rider No. 5; (vii) the extent of Whemco's communications (written and oral) with Pamela C. Polacek, Esquire regarding the DSP IV Proceeding, including all documents exchanged between Whemco and Ms. Polacek; (viii) Duquesne Light's 2010 base rate proceeding; and (ix) such other matters reasonably related to the inquiries specified in subparagraphs (i) – (viii) above. Further, Mr. Slingluff is hereby asked to provide and bring to the aforesaid deposition all documents currently in his possession relating to the items identified above.

The deposition of Mr. Rosenthal will inquire into matters relating to the statements made in Mr. Rosenthal's Direct Testimony. Mr. Rosenthal is hereby asked to provide and bring to the aforesaid deposition all documents currently in his possession related to his Direct Testimony, including all documents relied on to prepare his Direct Testimony and all workpapers.

Respectfully submitted,


Anthony D. Kanagy

ADK/skr

cc: Certificate of Service
Rosemary Chiavetta, Secretary

**CERTIFICATE OF SERVICE
(Docket No. C-2014-2459527)**

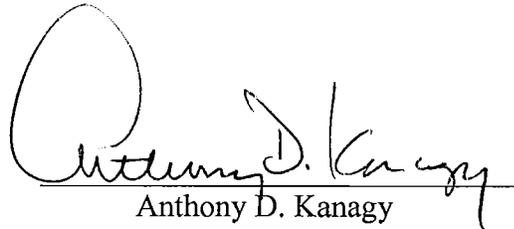
I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL and REGULAR MAIL

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Date: February 3, 2016


Anthony D. Kanagy