

Office of Commission Clerk Official Filing

Ruth Nettles

---

From: Costello, Jeanne [jcostello@carltonfields.com]  
 Sent: Tuesday, August 04, 2009 4:01 PM  
 To: Filings@psc.state.fl.us  
 Cc: Bryan.Anderson@fpl.com; Lisa Bennett; jbrew@bbrslaw.com; Jennifer Brubaker; john.burnett@pgnmail.com; jessica.cano@fpl.com; gadavis@enviroattorney.com; janusman@att.net; alex.glenn@pgnmail.com; mjh@talisman-intl.com; Ljacobs50@comcast.net; vkaufman@kagmlaw.com; paul.lewisjr@pgnmail.com; shayla.mcneill@tyndall.af.mil; jmcwhirter@mac-law.com; RMiller@pcsphosphate.com; jmoyle@kagmlaw.com; Charles Rehwinkel; eroach@mcguirewoods.com; Stright, Lisa; ataylor@bbrslaw.com; hthompson@talisman-intl.com; Tibbetts, Arlene; Jamie Whitlock; Anna Williams; Keino Young; Walls, J. Michael; Triplett, Dianne; Bernier, Matthew R.  
 Subject: Filing Docket 090009  
 Attachments: Docket 090009 Amended Notice of Deposition (Bradford) Duces Tecum.pdf



Docket 090009  
Amended Notice of

Docket 090009

In re: Nuclear Cost Recovery Clause

1. This filing is made by

Jeanne Costello on behalf of Dianne Triplett Carlton Fields, P.A.  
 4221 W. Boy Scout Boulevard, Suite 1000  
 Tampa, Florida 33607-5780  
 Direct: 813.229.4917  
 Fax: 813.229.4133  
 jcostello@carltonfields.com  
 www.carltonfields.com

2. This filing is Progress Energy Florida, Inc.'s Amended Notice of Deposition Duces Tecum as to Time and Location.

3. This filing consists of 5 pages.

4. This filing is made on behalf of Progress Energy Florida, Inc.

DOCUMENT NUMBER-DATE

08002 AUG-4 8

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Nuclear Power Plant  
Cost Recovery Clause

Docket No. 090009-EI  
Submitted for Filing: August 4, 2009

**PROGRESS ENERGY FLORIDA INC.'S  
AMENDED NOTICE OF DEPOSITION DUCES TECUM  
AS TO TIME AND LOCATION**

To: James W. Brew  
Brickfield Burchette Ritts & Stone, PC  
1025 Thomas Jefferson St, NW  
8<sup>th</sup> FL West Tower  
Washington, DC 20007-5201

NOTICE is hereby given that Progress Energy Florida, Inc. will take the deposition duces tecum of the following named individual at the following location and time indicated:

Peter A. Bradford	Thursday, August 6, 2009 1:00 p.m.	Telephonically Deponent and Court Reporter @ Brickfield Burchette Ritts & Stone, PC 1025 Thomas Jefferson St, NW 8 <sup>th</sup> FL West Tower Washington, DC 20007-5201
-------------------	---------------------------------------	---

Upon oral examination before an official court reporter or other officer authorized by law to take depositions.

The deponent is requested to have with him all documents listed on the attached Schedule A, as well as his prefiled testimony and exhibits.

The deposition is being taken for purposes of discovery, for use at trial, or for any other purposes allowed under the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

Please govern yourself accordingly.

Respectfully submitted,

R. ALEXANDER GLENN  
General Counsel  
JOHN BURNETT  
Associate General Counsel  
PROGRESS ENERGY SERVICE  
COMPANY, LLC  
Post Office Box 14042  
St. Petersburg, FL 33733-4042  
Telephone: (727) 820-5587  
Facsimile: (727) 820-5519



JAMES MICHAEL WALLS  
Florida Bar No. 0706242  
DIANNE M. TRIPLETT  
Florida Bar No. 0872431  
MATTHEW R. BERNIER  
Florida Bar No. 0059886  
CARLTON FIELDS, P.A.  
Post Office Box 3239  
Tampa, FL 33601-3239  
Telephone: (813) 223-7000  
Facsimile: (813) 229-4133

Court Reporter:  
Executive Court Reporters, Inc.  
1320 Fenwick Ln #100  
Silver Springs, MD 20910  
Phone: (301) 565-0064  
Fax: (301) 589-4280

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished to counsel and parties of record as indicated below via electronic and U.S. Mail this 4<sup>th</sup> day of August, 2009.



ATTORNEY

MR. PAUL LEWIS, JR.  
Progress Energy Florida, Inc.  
106 East College Avenue, Ste. 800  
Tallahassee, FL 32301-7740  
(850) 222-8738 / FAX: (850) 222-9768  
Email: [paul.lewisjr@pgnmail.com](mailto:paul.lewisjr@pgnmail.com)

JOHN W. MCWHIRTER  
McWhirter Law Firm  
400 North Tampa Street, Ste. 2450  
Tampa, FL 33602  
(813) 224-0866 / FAX: (813) 221-1854  
Email: [jmcwhirter@mac-law.com](mailto:jmcwhirter@mac-law.com)

CHARLES REHWINKEL  
Associate Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400  
(850) 488-9330  
Email: [rehwinkel.charles@leg.state.fl.us](mailto:rehwinkel.charles@leg.state.fl.us)

BRYAN S. ANDERSON  
JESSICA CANO  
Florida Power & Light  
700 Universe Boulevard  
Juno Beach, FL 33408-0420  
(561) 691-7101 / FAX: (561) 691-7135  
Email: [bryan.anderson@fpl.com](mailto:bryan.anderson@fpl.com)  
[Jessica.cano@fpl.com](mailto:Jessica.cano@fpl.com)

KEINO YOUNG  
LISA BENNETT  
JENNIFER BRUBAKER  
ANNA WILLIAMS  
Florida Public Service Commission  
2540 Shumard Oak Blvd  
Tallahassee 32399  
(850) 413-6218 / FAX: (850) 413-6184  
Email: [kyoung@psc.state.fl.us](mailto:kyoung@psc.state.fl.us)  
[lbennett@psc.state.fl.us](mailto:lbennett@psc.state.fl.us)  
[jbrubake@psc.state.fl.us](mailto:jbrubake@psc.state.fl.us)  
[awilliams@psc.state.fl.us](mailto:awilliams@psc.state.fl.us)

JAMES W. BREW  
F. ALVIN TAYLOR  
Brickfield Burchette Ritts & Stone, PC  
1025 Thomas Jefferson St NW  
8th FL West Tower  
Washington, DC 20007-5201  
(202) 342-0800 / FAX: (202) 342-0807  
Email: [jbrew@bbrslaw.com](mailto:jbrew@bbrslaw.com)  
[ataylor@bbrslaw.com](mailto:ataylor@bbrslaw.com)

VICKI GORDON KAUFMAN  
JON C. MOYLE, JR.  
118 North Gadsden Street  
Tallahassee, FL 32301  
(850) 681-3828 / FAX: (850) 681-8788  
Email: [vkaufman@kagmlaw.com](mailto:vkaufman@kagmlaw.com)  
[jmoyle@kgmlaw.com](mailto:jmoyle@kgmlaw.com)

HONORABLE CHARLES S. DEAN  
Senate Majority Whip  
411 Tomkins Street  
Inverness, FL 34450  
Phone: (352) 860-5175

HONORABLE MIKE FASANO  
8217 Massachusetts Avenue  
New Port Richey, FL 34653  
(727) 485-5885 / FAX: (727) 841-4453

E. LEON JACOBS, JR.  
Southern Alliance for Clean Energy, Inc.  
c/o Williams Law Firm  
1720 S. Gadsden Street MS 14, Ste. 20  
Tallahassee, FL 32301  
(850) 222-1246 / FAX: (850) 599-9079  
Email: [Ljacobs50@comcast.net](mailto:Ljacobs50@comcast.net)

RANDY B. MILLER  
White Springs Agricultural Chemicals, Inc.  
P.O. Box 300  
White Springs, FL 32096  
Email: [RMiller@pcsphosphate.com](mailto:RMiller@pcsphosphate.com)

CAPTAIN SHAYLA L. MCNEILL  
AFLOA/JACL-ULT  
AFCESA  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base, FL 32403  
(850) 283-6663 / FAX: (850) 283-6219  
Email: [shayla.mcneill@tyndall.af.mil](mailto:shayla.mcneill@tyndall.af.mil)

## SCHEDULE A

The deponent should bring with him the following documents:

1. All documents reviewed to draft testimony in this docket. The deponent may instead bring a list of all such documents reviewed, provided that all the documents were produced by PEF in the course of discovery in this proceeding.
2. All time records (with PEF-specific work broken out separately) reflecting work done to develop the PEF-specific testimony, including but not limited to expense statements, timesheets, invoices, fee credits, and expense reports.
3. All bills rendered to White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs (“PCS”) for the services provided by Bradford Brook Associates for the purpose of developing the PEF-specific testimony.
4. Any and all agreements between Bradford Brook Associates and PCS regarding the PEF-specific testimony, including but not limited to engagement agreements, consulting agreements, and documents reflecting the scope of the work Bradford Brook Associates was to perform.
5. Any and all reports, other than the pre-filed testimony, that Bradford Brook Associates prepared or drafted with respect to the Levy Nuclear Project and/or the CR3 Uprate project.