

Diamond Williams

From: George Cavros [george@cavros-law.com]
Sent: Monday, October 24, 2011 12:38 PM
To: Filings@psc.state.fl.us
Cc: Lisa Bennett; Keino Young; John Burnett; Jay Brew; Alvin Taylor; JR Kelly; Charles Rehwinkel; Erik Saylor; Vicki Kaufman; John Moyle; swright@gbwlegal.com
Subject: SACE's Cross-Notice of Telephonic Deposition- Docket No. 100437
Attachments: SACE -Cross Notice of Deposition-Docket No. 100437.pdf

Dear Commission Clerk,

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

A.
George Cavros, Esq.
120 E. Oakland Park Blvd, Ste. 105
Fort Lauderdale , FL 33334
Telephone: 954.563.0074
Facsimile: 866.924.2824
Email: george@cavros-law.com

B. This filing is made in Docket No. 100437-EI - In re: Examination of the outage and replacement fuel/power costs associated with the CR3 steam generator replacement project by Progress Energy Florida, Inc.

C. This document is filed on behalf of Southern Alliance for Clean Energy (SACE).

D. The document is 3 total pages.

E. The attached document is SACE's Cross-Notice of Telephonic Deposition.

Sincerely,

George Cavros

George Cavros, Esq.
120 E. Oakland Park Blvd, Ste. 105
Fort Lauderdale, FL 33334
954.563.0074 (office)
866.924.2824 (fax number)

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documents.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Examination of the outage and replacement fuel/power costs associated with the CR3 steam generator replacement project, by Progress Energy Florida, Inc.

Docket No. 100437-EI

Filed: October 24, 2011

**SOUTHERN ALLIANCE FOR CLEAN ENERGY'S
CROSS-NOTICE OF TELEPHONIC DEPOSITION**

To: John Burnett
Progress Energy Service Company, LLC
P.O. Box 14042
St. Petersburg, Florida 33733-4042

NOTICE is hereby given that the Southern Alliance for Clean Energy (SACE) will take the telephonic depositions of the following named individuals below:

NAME	DATE & TIME	LOCATION
Domingo Carriera	Thursday, November 10, 2011 9:00 a.m.	Sargent & Lundy, LLC 35th Floor, Conference Room 35E67 55 East Monroe Street Chicago, IL 60603
Javad Moslemian	Thursday, November 10, 2011 1:00 p.m. Friday, November 11, 2011 9:00 a.m.	Sargent & Lundy, LLC 35th Floor, Conference Room 35E67 55 East Monroe Street Chicago, IL 60603
Chris Sward	Friday, November 11, 2011 (30 min. after the conclusion of Javad Moslemian's deposition)	Sargent & Lundy, LLC 35th Floor, Conference Room 35E67 55 East Monroe Street Chicago, IL 60603

These telephonic depositions are being taken for purposes of discovery, for use at trial, or for any other purpose allowed under the Florida Rules of Civil Procedure, the Uniform Rules of Procedure, and the Rules of the Florida Public Service Commission.

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Since the deposition of the individuals named above have already been noticed by the Office of Public Counsel (OPC), Florida Industrial Power Users Group (FIPUG), White Springs Agricultural Chemicals, Inc., d/b/a PCS Phosphates – White Springs (PCS Phosphate), and Commission Staff, SACE states that it will plan to ask its deposition questions, if any, at the conclusion of the depositions by OPC, FIPUG, PCS Phosphate and Commission Staff.

Please govern yourself accordingly,

s/ George Cavros
George Cavros, Esq.
120 E. Oakland Park Blvd, Ste. 105
Fort Lauderdale, FL 33334
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Facsimile: 866.924.2824
Email: george@cavros-law.com

Attorney for Southern Alliance for
Clean Energy

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail and US Mail on this 24th day of October 24, 2011, to the following:

<p>Lisa Bennett & Keino Young Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 kyoung@psc.state.fl.us lbennett@psc.state.fl.us</p>	<p>John Burnett Progress Energy Florida, Inc. P.O. Box 14042 St. Petersburg, Florida 33733-4042 John.burnett@pgnmail.com</p>
<p>Robert Scheffel Wright & John T. LaVia c/o Gardner Law Firm 118 North Gadsden Street Tallahassee, Florida, 32301 swright@gbwlegal.com</p>	<p>J.R. Kelly, Charles Rewinkel, Erik Sayler Office of Public Counsel 111 W. Madison Street, Room 812 Tallahassee, Florida 32399-1400 Kelly.jr@leg.state.fl.us Rehwinkel.charles@leg.state.fl.us Sayler.erik@leg.state.fl.us</p>
<p>James W. Brew, Esq., F. Alvin Taylor, Esq. Brickfield, Burchette, Ritts & Stone, P.C. 1025 Thomas Jefferson Street, NW, Eighth Floor, West Tower Washington, DC 20007-5201 jbrew@bbrslaw.com ataylor@bbrslaw.com</p>	<p>Vicki Gordon Kaufman Jon C. Moyle, Jr. Keefe Anchors Gordon & Moyle, PA 118 North Gadsden Street Tallahassee, Florida 32301 vkaufman@kagmlaw.com jmoyle@kagmlaw.com</p>

s/ George Cavros
George Cavros