

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Environmental Cost)
Recovery Clause.)
_____)

DOCKET NO. 170007-EI
FILED: June 30, 2017

NOTICE OF DEPOSITION DUCES TECUM

TO: John Butler
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NOTICE is hereby given that the undersigned or another attorney with the Office of Public Counsel will take the deposition of the following named individual indicated below:

NAME	DATE AND TIME	LOCATION
Peter F. Anderson	Thursday, July 20, 2016 10:00 am	Office of Public Counsel 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400

The deponent is requested to have with him copies of the following documents:

1. Tetra Tech Technical Memorandum dated December 21, 2016 titled "Determination of Allocation of Costs for CCS Recovery and Improvement."
2. Tetra Tech Draft Technical Memoranda dated January 29, 2015 titled "Evaluation of Alternative Measures for Cooling Canal System Salinity Reduction," including but not limited to, any and all reconfigured calibrated water and salt balance models and calculations for Figure 2 of the referenced Draft Technical Memorandum which explain why the modeled salinities and water levels from the referenced water balance model spreadsheet do not match Figure 1.
3. Tetra Tech Technical Memorandum dated May 9, 2014 titled "Evaluation of Required Floridan Water for Salinity Reduction in the Cooling Canal System," including but not limited to, the predicted CCS stage and salinity computations indicated in Figures 1 and 2 of the referenced Technical Memorandum.
4. Tetra Tech Technical Memorandum dated December 3, 2014 titled "Evaluation of Drawdown in the Upper Floridan Aquifer Due to Proposed Salinity Reduction-based Withdrawals, including but not limited to, the drawdown computations indicated in Figures 8 and 9.

5. Tetra Tech Technical Memorandum dated May 13, 2014 titled "Evaluation of Drawdown in the Upper Floridan Aquifer Due to Proposed Salinity Reduction-based Withdrawals," including but not limited to, the drawdown computations indicated in Figures 9, 10 and 11.
6. Comprehensive Pre-Uprate Monitoring Report for Units 3 & 4 Uprate Project, October 31, 2012 by Ecology and Environment Inc.
7. All SEAWAT files related to the simulation for "Alternative3D_CCSasContain_model_Input"
8. All SEAWAT files related to the simulation for "Alternative3D_CCSasOther_model"
9. Source codes for utility executables under "Alternative3D_CCSasContain_PostProcessing"
10. Source codes for utility executables under "Alternative3D_CCSasOther_PostProcessing"
11. Water and salt balance model excel spreadsheet "1_Water balance_Model_Nov2015.xlsx," and any and all other revised excel files used for the balance calculations for past and predictive conditions.
12. All MODFLOW files for the various predictive simulations conducted for extraction from the UFA for CCS freshening water

This deposition shall be taken upon oral examination before an official court reporter or other officer authorized by law to take depositions. 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 note that a call in number and passcode will be provided to all parties at the service email address contained in the Certificate of Service prior to this deposition.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

J. R. Kelly
Public Counsel



Stephanie A. Morse
Associate Public Counsel

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Attorneys for the Citizens
of the State of Florida

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and foregoing Citizens' Notice of Service has been furnished by electronic mail on this 30th day of June, 2017, to the following:

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