

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Re: Petition for determination of need for
Dania Beach Clean Energy Center Unit
7, by Florida Power & Light Company

Docket No. 20170225-EI
Served: Jan. 2, 2018

SIERRA CLUB'S
NOTICE OF TAKING DEPOSITION DUCES TECUM

TO: Kenneth A. Hoffman
Florida Power & Light Company
215 S. Monroe Street, Suite 810
Tallahassee, FL 32301
ken.hoffman@fpl.com

William P. Cox
Florida Power & Light Company
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Michael Marcil
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Pursuant to Rule 1.310, Florida Rules of Civil Procedure, notice is hereby given that

Sierra Club will take the deposition of the following named individuals identified below:

NAME	DATE AND TIME	LOCATION
Hector J. Sanchez	January 8, 2018; 9:00 a.m.	FPL Offices, 9250 W Flagler St, Miami, FL 33174
Steven R. Sim	Immediately after conclusion of Sanchez deposition	FPL Offices, 9250 W Flagler St, Miami, FL 33174

Each deponent should bring copies of those documents set forth in Exhibit A hereto. The deponents should not bring any document that has already been produced by Florida Power & Light Company (FPL) to Sierra Club in discovery.

The deposition shall be taken upon oral examination before an official court reporter or other officer authorized by law to take depositions. A Notary Public will be available to swear in the witness. The deposition is 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. The oral examination will continue from day to day until completed.

The deponents must appear in person at the location of the deposition specified in this notice. A telephonic conference line is available if a party wishes to participate telephonically. The telephone number for the conference line is 866-501-6174. The code is 1906913#.

In accordance with the Americans with Disabilities Act, persons needing a special accommodation to participate at this proceeding should contact the Office of Commission Clerk as soon as possible at 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 or 850-413-6770 (Florida Relay Service, 1-800-955-8770 Voice or 1-800-955-8771 TDD). Assistive Listening Devices are available upon request from the Office of Commission Clerk, Gerald L. Gunter Building, Room 152.

Please govern yourselves accordingly.

/s/ Michael Lenoff

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Qualified Representatives for Sierra Club

EXHIBIT A TO NOTICE OF TAKING DEPOSITION DUCES TECUM FOR HECTOR
SANCHEZ AND STEVEN R. SIM¹

1. Your current curriculum vitae.
2. Any final reports, whether prepared by you or at your direction, relating to your services in this docket.
3. Any deposition or hearing transcripts provided to you, or parts of deposition transcripts or any other statements or written materials provided to you, which you have examined or will examine in the formulation of your opinions and conclusions in this docket.
4. Any diagrams or drawings made by you or provided to you which you have examined in regard to this docket.
5. Any statements or affidavits taken by you, at your direction, or provided to you for your review concerning any of the facts which are involved in this docket.
6. Copies of any articles, books, papers, or other publications prepared by you which relate to facts similar to the facts surrounding the subject matter of this docket.
7. Any document or material that supports, or which you relied on for, your assumption in 2016 that 983 megawatts was the maximum amount of achievable solar PV resources in Southeast Florida.
8. Except for the documents and materials that you bring in response to the requests above, all documents that memorialize the guidance from FPL's system operations to maintain the same gap between retirement of the Lauderdale units 4 and 5 and DBEC Unit 7's in-service date.
9. Except for the documents and materials that you bring in response to the requests above, any and all models or demonstrative tools upon which you have relied or plan to rely in the formulation and expression of your opinions and conclusions concerning the subject matter of this docket.
10. Except for the documents and materials that you bring in response to the requests above, copies of any work papers made by you or provided to you, whether or not you relied on those work papers, relating to your opinions, your conclusions, or any responses to discovery requests sponsored by you in this docket.
11. Except for the documents and materials that you bring in response to the requests above, all documents prepared by you to illustrate or demonstrate any fact or opinion considered relevant to this docket and/or to your assignment, investigation, or opinions.

¹ The words "you" and "your" refer individually to each deponent.

12. Except for the documents and materials that you bring in response to the requests above, any and all materials that you used as a basis or predicate for your opinions and conclusions in connection with this docket, including, but not limited to, published reports by any private, non-profit or government agency, textbooks, articles, data, documents furnished by the party engaging your services, government or industry standards or regulations, or any study.
13. Except for the documents and materials that you bring in response to the requests above, any and all materials that you did not use as a basis or predicate for your opinions and conclusions in connection with this docket but which were prepared by you, provided to you, or obtained by you, including, but not limited to, published reports by any private, non-profit or government agency, textbooks, articles, data, documents furnished by the party engaging your services, government or industry standards or regulations, or any study.
14. A copy of any employment agreement or other agreement between you and Florida Power & Light Company (or any of its affiliates) that covers the terms of your work in this matter including, but not limited to, any fees for your services.
15. A copy of all statements, bills, invoices, check stubs, or any other document that reflects payment or compensation, or a request for payment or compensation, for your services in this docket.
16. A list of all other expert witness services you performed for FPL (or any of its affiliates) in the last three years.
17. Except for the documents and materials that you bring in response to the requests above, copies of all publications, expert reports, depositions, or other documents in which you have discussed renewable energy in the last three years.
18. Except for the documents and materials that you bring in response to the requests above, copies of all publications, expert reports, depositions, or other documents in which you have discussed gas-burning electrical power plants in the last three years.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served electronically on this 2nd day of January, 2018, on:

Florida Power & Light Company
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/s/ Michael Lenoff

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Qualified Representative for Sierra Club