

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition to determine need for )  
Seminole combined cycle facility, by ) DOCKET NO. 20170266-EC  
Seminole Electric Cooperative, Inc. )  
)  
In re: Joint petition for determination )  
of need for Shady Hills combined cycle ) DOCKET No. 20170267-EC  
facility in Pasco County, by Seminole )  
Electric Cooperative, Inc. and Shady ) DATED: March 2, 2018  
Hills Energy Center, LLC. )  
)

**NOTICE OF TAKING TELEPHONIC DEPOSITION DUCES TECUM OF  
TAO HONG**

To: Gary V. Perko ([gperko@hgslaw.com](mailto:gperko@hgslaw.com))  
Brooke E. Lewis ([blewis@hgslaw.com](mailto:blewis@hgslaw.com))  
Malcolm N. Means ([mmeans@hgslaw.com](mailto:mmeans@hgslaw.com))  
Hopping Green & Sams Law Firm  
P.O. Box 6526  
Tallahassee, Florida 32314

Pursuant to Rule 1.310, Florida Rules of Civil Procedure,  
notice is hereby given that Michael Tulk, Patrick Daly, and Quantum  
Pasco Power, L.P. ("Intervenors") will take the telephonic  
deposition duces tecum of the following named individual at the  
date, time and location, listed below:

<b>Name</b>	<b>Date and Time</b>	<b>Location</b>
Tao Hong	Tuesday, March 6, 2018 9:30 a.m.	1507 Willow Oak Pond Ln. Charlotte, NC 28270

The deponent shall produce, either at the deposition or in  
advance, copies of all documents responsive to the document  
requests set forth on Exhibit "A" attached hereto.

The telephonic deposition shall be taken upon oral examination  
before an official court reporter or other officer authorized by  
law to take depositions. The telephonic deposition is being taken

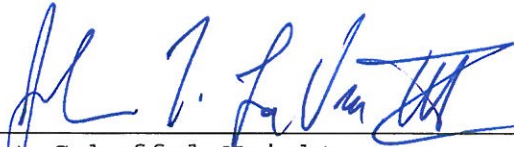
for purposes of discovery, for use at hearing, or for any other purpose allowed under the Florida Rules of Civil Procedure, the Uniform Rules of Procedure, and the Rules of the Florida Public Service Commission. The oral examination will continue from day to day until completed.

The telephonic conference line is available if a party wishes to participate telephonically. The telephone number for the conference line is 1-877-826-6967 and the passcode is 7856717 followed by the "#" sign.

In accordance with the American with Disabilities Act, persons needing a special accommodation to participate at this proceeding should contact the Office of Commission Clerk as soon as possible prior to the deposition 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.

Respectfully submitted this 2nd day of March 2018.



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Robert Scheffel Wright

scheff@gbwlegal.com

John T. LaVia, III

jlavia@gbwlegal.com

Gardner, Bist, Bowden, Bush,  
Dee, LaVia & Wright, P.A.

1300 Thomaswood Drive

Tallahassee, Florida 32308

Telephone (850) 385-0070

Facsimile (850) 385-5416

Attorneys for Intervenors

**EXHIBIT "A"**

**Document Requests**

1. Your current curriculum vitae.
2. All work papers that show or relate to the analyses and opinions presented in your pre-filed testimony in this docket.
3. Any final reports prepared by you or at your direction, relating to your services in this docket.
4. Copies of any notes made by you, or provided to you, relating to your opinions or conclusions in this docket, whether you relied on those notes or not in developing your pre-filed testimony in this docket.
5. All literature and/or documents that you considered relevant to your assignment in this docket and which you considered in the development of your opinions or conclusions concerning the subject matter of the 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 and all materials considered, consulted, and used by you as a basis or predicate for your opinions and conclusions, including, but not limited to, published reports by any private, non-profit or government agency, textbooks, articles, data, or documents furnished by the party engaging your services, or government or industry standards or regulations.

**CERTIFICATE OF SERVICE**


I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the following by electronic mail on this 2nd day of March 2018.

Rachael Dziechciarz (rdziechc@psc.state.fl.us)  
Stephanie Cuello (scuello@psc.state.fl.us)  
Florida Public Service Commission  
Office of the General Counsel  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32390

Gary V. Perko (gperko@hgslaw.com)  
Brooke E. Lewis (blewis@hgslaw.com)  
Malcolm N. Means (mmeans@hgslaw.com)  
Hopping Law Firm  
P.O. Box 6526  
Tallahassee, Florida 32314

David Ferrentino (Dferrentino@seminole-electric.com)  
Seminole Electric Cooperative, Inc.  
16313 North Dale Mabry Highway  
Tampa, Florida 33618

Trudy Novak (tnovak@seminole-electric.com)  
Seminole Electric Cooperative, Inc.  
P.O. Box 272000  
Tampa, Florida 33688

  
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Attorney