

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to determine need for Seminole combined cycle facility, by Seminole Electric Cooperative, Inc.	DOCKET NO. 20170266-EC
In re: Joint Petition to determine need for the Shady Hills combined cycle facility, by Seminole Electric Cooperative, Inc. and Shady Hills Energy Center, LLC.	DOCKET NO. 20170267-EC DATED: MARCH 12, 2018

**PETITIONERS' RESPONSE TO INTERVENORS' NOTICE OF
INTENT TO INTRODUCE PORTIONS OF DEPOSITION
[OF MICHAEL WARD] INTO HEARING RECORD**

Pursuant to Section VI.G of the Order Establishing Procedure (Order No. PSC-2018-0018-PCO-EC), Petitioners, Seminole Electric Cooperative, Inc., and Shady Hills Energy Center, LLC., hereby responds to Intervenor's Notice of Intent to Introduce Portions of the Deposition [of Michael Ward] into the Hearing Record:

1. Because the deposition of Mr. Ward has not yet been transcribed, Intervenor's notice does not provide the page and line numbers of the deposition transcript that Intervenor intend to introduce into the record. As a result, Petitioners are unable to respond with objections to the specific portions of the deposition that Intervenor intend to introduce into the record.

2. Because Mr. Ward will be testifying at hearing, Petitioners reserve the right to object to introduction of any portions of the deposition that are beyond the scope of the corporate representation designation made pursuant Rule 1.310(b)(6) of the Florida Rules of Civil Procedure. See Fla. R. Civ. P. 1.330 (regarding use of depositions).

3. When Intervenor identify the specific portions of the deposition they seek to introduce, Petitioners will supplement this response to identify any objections or otherwise advise the parties that they have no objections.

Respectfully submitted this 12th day of March, 2018.

HOPPING GREEN & SAMS

By: //s//Gary V. Perko
Gary V. Perko
Brooke E. Lewis
Malcolm N. Means
P. O. Box 6526
Tallahassee, Florida 32314
Phone: 850/222-7500; Fax: 850/224-8551
Email: GPerko@hgslaw.com
BLewis@hgslaw.com
MMeans@hgslaw.com

Attorneys for SEMINOLE ELECTRIC COOPERATIVE,
INC., and SHADY HILLS ENERGY CENTER, LLC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
electronic mail to the following on this 12th day of March, 2018:

Charles W. Murphy
Rachael Dziechciarz
FLORIDA PUBLIC SERVICE COMMISSION
Office of the General Counsel
2540 Shumard Oak Boulevard
Tallahassee, Florida 32390
cmurphy@psc.state.fl.us
rdziehc@psc.state.fl.us

Robert Scheffel Wright
John T. LaVia, III
GARDNER, BIST, BOWDEN, BUSH,
DEE, LAVIA & WRIGHT, P.A.
1300 Thomaswood Drive
Tallahassee, Florida 32308
schef@gbwlegal.com
jlavia@gbwlegal.com

Attorneys for the PUBLIC SERVICE COMMISSION

*Attorneys for QUANTUM PASCO POWER, L.P.,
MICHAEL TULK AND PATRICK DALY*