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April 19, 2019

HAND DELIVERED

Mr. Adam J. Teitzman  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Petition for recovery of costs associated with named tropical systems during the 2015, 2016 and 2017 hurricane seasons and replenishment of storm reserve subject to final true-up, by Tampa Electric Company  
FPSC Docket No. 20170271-EI

Dear Mr. Teitzman:

Enclosed for filing in the above docket on behalf of Tampa Electric Company is a CD containing the public version of the following:

1. Transcript of the Deposition of Wesley William Caldwell, taken in the above proceeding on August 8 and 9, 2018.
2. Exhibits to the above deposition of Wesley William Caldwell, produced during the course of said deposition and as late-filed deposition exhibits.

These documents are the subject of a Request for Confidential Classification and Motion for Temporary Protective Order being separately filed this date with the Commission.

Thank you for your assistance in connection with this matter.

Sincerely,



Malcolm N. Means

MNM/pp  
Enclosure

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Re: Petition for recovery of : DOCKET NO. 20170271-EI
costs associated with named :
tropical systems during the : FILED: August 2, 2018
2015, 2016, and 2017 hurricane :
seasons and replenishment of :
storm reserve subject to final :
true-up, Tampa Electric Company.:

CONFIDENTIAL DEPOSITION DUCES TECUM
VOLUME I

DEPOSITION OF: WESLEY WILLIAM CALDWELL
DATE: August 8, 2018
TIME: 8:40 a.m. to 11:40 a.m.
12:32 p.m. to 6:42 p.m.

PLACE: TECO Plaza
702 North Franklin Street
6th Floor Regulatory Conference Room
Tampa, FL 33602
REPORTED BY: ANN S. BEILSTEIN, RPR
Notary Public
State of Florida at Large

APPEARANCES CONTINUED:
Also Present for Office of Public Counsel:
HELMUTH SCHULTZ, Consultant
Also Present for TECO:
MATT LARUSSA, P.E.
CARLOS ALDAZABAL
S. BETH YOUNG
CRYSTAL CHISOLM, ASSISTANT

Appearing Telephonically for Public Service Commission:

JOHANA NIEVES
BART FLETCHER
CURT MOURING

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INDEX

Table with 2 columns: INDEX and PAGE. Includes entries like DIRECT EXAMINATION BY MR. REHWINKEL, CROSS-EXAMINATION BY MR. MOYLE, etc.

EXHIBITS

Table with 2 columns: DESCRIPTION and PAGE. Includes entries like Final Foreign Line Crew Spreadsheet, Preliminary Foreign Line Crew Spreadsheet, etc.

1 EXHIBITS  
2 DESCRIPTION  
3 FOR THE OFFICE OF PUBLIC COUNSEL: PAGE  
4 31 - Lutz Hilton Garden Inn Receipts..... 167  
5 32 - Late-Filed - Complete [REDACTED] Final  
6 Timesheet Summary..... 169  
7 33 - Glory Days Grill Receipt..... 172  
8 34 - [REDACTED] Management Labor Cost Summary..... 214  
9 35 - Late-Filed - Reconciliation adjustments for  
10 erroneous time reports from [REDACTED]..... 216  
11 36 - Rental Invoices..... 224  
12 37 - Late-Filed - Reconciliation of Pages 520, 120,  
13 81, 121 and 143..... 230  
14 38 - Prepay [REDACTED]..... 234  
15 39 - Pelagia [REDACTED]..... 236  
16 40 - Pelagia [REDACTED]..... 237  
17 41 - [REDACTED] Receipt..... 238  
18 42 - Florence Receipt..... 239  
19 43 - BurgerFi Receipt..... 241  
20 44 - Bonefish Receipt..... 242  
21 45 - Cafe Breeze Receipt..... 243  
22 46 - TGI Friday's Receipt..... 244  
23 47 - Dancing Pigs Receipt..... 246  
24 48 - La Teresita Invoice..... 248  
25 49 - [REDACTED] Prepay..... 249  
50 - Ridge Manor [REDACTED] Prepay..... 250  
51 - [REDACTED] Receipt..... 251  
52 - Sunoco [REDACTED]..... 252  
53 - [REDACTED] Fuel Summary..... 253  
54 - [REDACTED] Prepay..... 254  
55 - [REDACTED] Fuel Invoices..... 255  
56 - [REDACTED] Fuel Invoices..... 256  
57 - Emporia Receipt..... 261  
58 - St. Augustine Receipt..... 261  
59 - Lake Park Invoice..... 266  
60 - Orlando [REDACTED] Prepay..... 267

1 MR. REHWINKEL: Okay.  
2 BY MR. REHWINKEL:  
3 Q For today's deposition it's been noticed as  
4 confidential, and the reason for that is that the vast  
5 majority of the documents that we'll be talking about  
6 are at this time designated as confidential by TECO. Do  
7 you understand that?  
8 A Yes, sir.  
9 Q And they have been -- they are subject to a  
10 pending request for confidentiality or a claim of  
11 confidentiality, but until it's finally adjudicated, all  
12 such documents are confidential.  
13 Since the deposition is taken and noticed as  
14 confidential and everyone that's on the call is  
15 authorized to view and receive the confidential  
16 information, I would expect you to answer questions  
17 without regard to whether the information is  
18 confidential or not. Do you understand that?  
19 A Yes, sir.  
20 MR. REHWINKEL: Is that acceptable?  
21 MR. WAHLEN: That's fine for Tampa Electric.  
22 MR. REHWINKEL: Okay. Now, at the conclusion  
23 of this deposition, the court reporter will be  
24 instructed to only provide the deposition to  
25 entities that Jeff Wahlen or Mr. Beasley, attorneys

1 WESLEY WILLIAM CALDWELL,  
2 the witness herein, being first duly sworn on oath, was  
3 examined and deposed as follows:  
4 DIRECT EXAMINATION  
5 BY MR. REHWINKEL:  
6 Q All right. Good morning, Mr. Caldwell. My  
7 name is Charles Rehwinkel with the Office of Public  
8 Counsel, and I'm here to ask you some questions about  
9 the storm invoices for Tampa Electric.  
10 MR. REHWINKEL: Before I ask you questions, I  
11 want to go over some administrative matters with  
12 everyone, but I wanted to ask if we can agree that  
13 all objections, except as to form of the questions,  
14 are reserved?  
15 MR. WAHLEN: Yes.  
16 MR. REHWINKEL: Okay.  
17 BY MR. REHWINKEL:  
18 Q And Mr. Caldwell, if your attorney objects,  
19 but he does not instruct you to answer the question, I  
20 will expect you to answer the question. Do you  
21 understand that?  
22 A Yes, sir.  
23 MR. REHWINKEL: Okay. And I assume you will  
24 not waive reading and signing.  
25 MR. WAHLEN: We'll want to read and sign, yes.

1 for Tampa Electric, have confirmed to her by e-mail  
2 that a party is authorized to receive the  
3 deposition.  
4 Is that acceptable, Jeff?  
5 MR. WAHLEN: That's fine for Tampa Electric  
6 Company. We agree to that.  
7 MR. REHWINKEL: Okay. At some point in the  
8 process, if the deposition is to be used in any way  
9 at the proceeding, we would expect Tampa Electric  
10 to make a designation of what information is  
11 ultimately deemed to be confidential in the  
12 deposition and submit that for review and approval  
13 by the Public Service Commission, if it comes to  
14 that.  
15 Do you understand that?  
16 MR. WAHLEN: That's acceptable to Tampa  
17 Electric Company.  
18 MR. REHWINKEL: Okay. So just to be clear  
19 with everyone on the phone, the deposition is  
20 confidential. Anyone who might come into the --  
21 into hearing of the deposition, you should let us  
22 know if they're not authorized and take steps  
23 accordingly so that we can maintain the claim of  
24 confidentiality until it's finally adjudicated by  
25 Tampa Electric.

1 So with that, do we have any more  
 2 administrative details, Jeff, that we need to deal  
 3 with?  
 4 MR. WAHLEN: Well, we might just want to give  
 5 people an idea of what the schedule looks like for  
 6 today --  
 7 MR. REHWINKEL: Okay.  
 8 MR. WAHLEN: -- for planning purposes.  
 9 MR. REHWINKEL: Yes. It's 8:45 now. I think  
 10 I'd like to go three hours, which would take us to  
 11 about 11:45, and then take a 45-minute lunch, and  
 12 then resume -- I guess that would put us -- I can't  
 13 do math.  
 14 MR. WAHLEN: 12:30.  
 15 MR. REHWINKEL: -- around 12:30 to restart.  
 16 And then I'd like to go another -- until about 2:30  
 17 or 3:00 and take stock of where we are. And I  
 18 would ask the other parties if they feel like  
 19 they're going to have questions, and we would  
 20 assess at that point whether we want to provide the  
 21 parties an opportunity to ask a limited amount of  
 22 questions, and then allow me to continue on.  
 23 Just as a matter of fairness, I believe this  
 24 is going to be a rather long deposition that's  
 25 going to go a good bit of the day. And so if

1 Charles.  
 2 MR. REHWINKEL: Okay. Thank you.  
 3 BY MR. REHWINKEL:  
 4 Q All right. Well, now we can proceed with the  
 5 questions. And I'd like to ask you, Mr. Caldwell,  
 6 before we get started to state your name and your  
 7 business address and your job title and your employer  
 8 for the record.  
 9 A My name is Wesley -- full name,  
 10 Wesley William Caldwell. My business address is  
 11 2405 East Sligh Avenue, Tampa, Florida 33610. I'm with  
 12 Tampa Electric Company. I'm the meter operations  
 13 engineer for the company.  
 14 Q Can you tell me a little bit about your  
 15 employment history with Tampa Electric starting with  
 16 what you do today and go back to when you started with  
 17 the company?  
 18 A Yes, sir. For the last 14 years, I've been  
 19 the meter operations engineer with Tampa Electric.  
 20 Before that, I worked in substation engineering with  
 21 what's called supervisory control and data acquisition,  
 22 both distribution, transmission and substation, power  
 23 plants, basically bringing back data from everywhere in  
 24 the company remotely, and I started that really as a  
 25 cooperative engineering student in 1997.

1 parties have questions or they think they're going  
 2 to have questions, we can address that after lunch.  
 3 And as we approach the end of the working day,  
 4 we'll assess where we are and how much longer we  
 5 have to go and we will talk about whether to  
 6 continue it tomorrow or to go on into the evening.  
 7 And we'll also ask the court reporter about her  
 8 availability at that time.  
 9 So just for planning, I think that's where  
 10 we're going to be, kind of a long day.  
 11 MR. WAHLEN: That's fine.  
 12 MR. MOYLE: For planning purposes, I am going  
 13 to have a window from about noon until 2:00 where  
 14 I'm not going to be available, but proceed forward.  
 15 And I appreciate the opportunity around 3:00 or  
 16 3:30 to permit others to ask questions if they have  
 17 them. We've got a good plan.  
 18 MS. CHRISTENSEN: And this is Patty. Just for  
 19 informational purposes, since we've switched the  
 20 phone numbers, when I get to the office I'm going  
 21 to be redialing in, just so you don't have to stop  
 22 and wait for me to re-announce.  
 23 MR. REHWINKEL: Okay. All right.  
 24 Schef, anything?  
 25 MR. WRIGHT: That all sounds good to me,

1 MR. REHWINKEL: Somebody has their phone off  
 2 mute, it sounds like. So please --  
 3 MR. MOYLE: Yes, I'm sorry. I'll put it on  
 4 mute.  
 5 BY MR. REHWINKEL:  
 6 Q So what was your -- tell me what you did  
 7 before you were a cooperative student.  
 8 A I was at the University of South Florida in  
 9 the electrical engineering program. And before that, I  
 10 was in the U.S. Air Force for 20 years.  
 11 Q Okay. And before we ask about the Air Force,  
 12 what was your degree?  
 13 A Electrical engineering. I have a Bachelor of  
 14 Science in electrical engineering.  
 15 Q From USF?  
 16 A Yes, sir.  
 17 Q And was that in 1997?  
 18 A I graduated in 2000.  
 19 Q Okay. Now, are you a P.E. in the state of  
 20 Florida?  
 21 A No, sir.  
 22 Q Are you a P.E. in any state?  
 23 A No, sir.  
 24 Q Okay. Tell me a little bit about your  
 25 background in the military and what your job title and

1 description was, to the best of your recollection today.  
 2 A I was -- my job title was scientific repair  
 3 technician, and it's a very small career field in the  
 4 Air Force. I worked for a group that did treaty  
 5 verification, nuclear arms research. With them for 16  
 6 years. And before that period, I was an aircraft  
 7 mechanic. But those last 16 years, I was basically  
 8 considered a high-level electronics technician.  
 9 Q And in terms of verification, what was your --  
 10 what generally were you trying to do?  
 11 A That -- I maintained equipment. Trained  
 12 operators to operate that equipment on a worldwide  
 13 basis.  
 14 Q So were you, essentially, verifying compliance  
 15 with --  
 16 A Yes.  
 17 Q -- nuclear arms treaties?  
 18 A Yes, sir.  
 19 Q So you had a role in -- well, your role was  
 20 not to verify the information, but to maintain the  
 21 equipment that was used to verify the information?  
 22 A Yes, sir.  
 23 Q Okay. And prior to your flight mechanic  
 24 duties in the Air Force?  
 25 A Straight out of high school.

1 internal logistics folks to get them prepared for those  
 2 arriving crews, and then during the storm tried to  
 3 monitor their placement at service areas, what we call  
 4 incident bases. And after the storm, again started  
 5 gathering documents for invoices, receiving their  
 6 invoices and starting to process them.  
 7 Q When you say "starting to process," what did  
 8 you mean by that?  
 9 A Well, it's not, you know, looking at two  
 10 pieces of paper and say, yeah, pay it or not pay it.  
 11 The process, you know, was to verify that they did work  
 12 for Tampa Electric, but they did respond to the storm,  
 13 and then review their documentation, crew rosters,  
 14 vehicle rosters, rate sheets, and then any incidental  
 15 receipts that they might have.  
 16 Q Okay. Let's go back up to the top.  
 17 You said even before the storm you were  
 18 engaged in this process. What time would that have  
 19 been?  
 20 A Probably somewhere around the 2nd or 3rd of  
 21 September.  
 22 Q And was it because there was a certain status  
 23 of Hurricane Irma or the storm at that time?  
 24 A Yes, sir. It was -- once the -- once we're  
 25 within a week of projected landfall and impact to the

1 Q Okay. All right. The reason we're here today  
 2 is to talk about what your role was in reviewing vendor  
 3 invoices and supporting documentation in the -- that was  
 4 provided in discovery in this case. Do you understand  
 5 that?  
 6 A Yes, sir.  
 7 Q And your name appears on many, but not all, of  
 8 the documents in the production in Citizens  
 9 interrogatory number 76 and the supplement to that. Is  
 10 that right?  
 11 A Yes, sir.  
 12 Q Okay.  
 13 A I understand that.  
 14 Q So what I would like to understand at just a  
 15 high level right now is what your job assignment was  
 16 when it came to Hurricane Irma and interaction with  
 17 vendors or their invoices.  
 18 A Well, starting even before the storm, I  
 19 functioned as what we call the foreign crew coordinator,  
 20 and that was to -- as crews were made available or  
 21 through mutual assistance groups, those contacts were  
 22 given to me and coordinators that I oversaw, and we  
 23 contacted those crews, gathered support documents from  
 24 them and their travel plans, their estimated time of  
 25 arrival on site, coordinated with logistics, our

1 Tampa Electric area, it's been pretty much our procedure  
 2 to start implementing storm protocols.  
 3 Q Okay. Now, tell me your job title again.  
 4 Meter operations engineer?  
 5 A Yes, sir.  
 6 Q Okay. What is it about a meter operations  
 7 engineer that puts that person in this position?  
 8 A Traditionally, the foreign crew coordinator  
 9 had been the manager of meter operations, and a few  
 10 years back they bumped that responsibility down to the  
 11 meter operations engineer. I had been a team member  
 12 before that.  
 13 Q Okay. So when was the first time you  
 14 performed the function you performed in Hurricane Irma  
 15 within the company for storm purposes?  
 16 A Probably 2015.  
 17 Q Okay. So what hurricane events did you  
 18 perform this same role other than Irma?  
 19 A I think that would have been Erika,  
 20 Hurricane Erika. And then we really didn't have any  
 21 foreign crews for Hurricane Matthew in 2016. So really,  
 22 I just -- I had the function. I was available if  
 23 needed, but just basically monitoring the situation.  
 24 Q And for Erika, when would that have been?  
 25 A I think that would have been 2015.

1 Q And were there foreign crews involved there?

2 A There were a few foreign crews. I can't  
3 remember how many, but it was really just a  
4 minimum-impact storm to Tampa Electric.

5 Q And when I say TECO, I mean Tampa Electric.  
6 Do you understand that?

7 A Yes, sir.

8 Q Okay. When you performed this role in  
9 Hurricane Erika, did you do everything there that you  
10 did function-wise for Irma or was Irma a much bigger  
11 event?

12 A Irma was a huge event compared to Erika. It  
13 was a huge storm. It was projected to impact most all  
14 of the state of Florida. It was right on the tail end  
15 of Hurricane Harvey affecting Texas. Assets were --  
16 they weren't available when we first -- you know, when  
17 they went out to mutual assistance groups, assets just  
18 were not available. So there is almost no comparison  
19 between the two storms.

20 Q Now, when you -- the work that you do, is that  
21 something that you train for and you do in drills?

22 A Yes, sir. We have at least one mock exercise  
23 a year where we work with the other incident base  
24 commanders, the resource planners, et cetera.

25 Q Is there any drilling that goes on with

1 standards for paying invoices or the type of costs that  
2 you would approve for payment?

3 A There are tiers of authority. And, like, I  
4 can only approve invoices up to \$10,000 for payment.  
5 Everything above that needs to go to a manager or a  
6 director or at a level of the vice president, and above  
7 that signature level, it has to go to the president of  
8 the company.

9 Q And do those tiers of authority apply for  
10 reviewing storm invoices?

11 A Yes, sir.

12 Q Okay. With respect to the Southeastern  
13 Electric Exchange Mutual Assistance Agreement  
14 Guidelines, did those guidelines cover all of the  
15 foreign crew vendors that you dealt with?

16 A They didn't cover all of them because not  
17 everyone was a member of that mutual assistance group.  
18 I think we pulled from, I want to say, three to four  
19 different mutual assistance groups, what they call  
20 regional mutual assistance groups. And so not all of  
21 those would have been, you know, agreements on that  
22 Southeastern Electric Exchange, but they all basically  
23 said it was fine, you know, they didn't find any  
24 problems with what was set forward.

25 Q Okay. When you said they all said it was

1 respect to reviewing invoices, or that's something that  
2 you can only really do when you actually get actual  
3 invoices?

4 A Yes, sir. I mean, in day-to-day life, you  
5 know, I receive invoices from vendors, meter vendors,  
6 hazardous gas vendors, et cetera. So I reviewed  
7 invoices before.

8 Q Okay.

9 A Just not to the magnitude.

10 Q When you're reviewing invoices, are there TECO  
11 procedures that you follow? Would they be the same  
12 procedures that you would follow for reviewing invoices  
13 in your day-to-day life with respect to what you did for  
14 Irma?

15 A Well, pretty much. Yeah, these would be  
16 unique because you have labor, vehicles, incidentals.  
17 But we have company guidelines as far as prohibited  
18 products, and then there are -- we're part of what's  
19 called the Southeastern Electric Exchange Mutual  
20 Assistance Group and they have some guidelines about  
21 what we would pay for and not pay for that's agreed, you  
22 know, among the utilities that are members and we use  
23 those guidelines.

24 Q With respect to internal TECO guidelines, what  
25 specifically would you reference there? Are there

1 fine, who is "they"?

2 A The contractors, the vendors.

3 Q Okay. I guess we're -- let me -- let's talk  
4 about Southeastern first. The Southeastern Electrical  
5 Exchange Mutual Assistance Agreement, does that only  
6 apply to investor-owned utilities?

7 A Yes, sir.

8 Q Okay. When you talk about these other  
9 regional MUAs, were those also investor-owned utility to  
10 investor-owned utility arrangements?

11 A I could not answer that. I don't know what  
12 the regional mutual assistance groups are comprised of.

13 Q So when you say you pulled from them, you got  
14 crews who were members of those that were not members of  
15 the SE -- what do you call it? Is it SEE?

16 A Yes, that's good, SEE.

17 Q Okay. And TECO's a member of SEE; is that  
18 right?

19 A Yes, sir.

20 Q So are there formal agreements that the  
21 members of the SEE have? Is it "We'll honor these terms  
22 and conditions and guidelines"?

23 A Yes, sir.

24 Q And those are what you use to evaluate whether  
25 payment is appropriate with respect to those guidelines?

1 A Our charges were appropriate.  
 2 Q Okay. And then when it comes to people from a  
 3 non-SEE MUA arrangement, did they provide you with their  
 4 standards and you applied those, or did you say, "Will  
 5 you be willing to apply the SEE standards?"  
 6 A We never had to approach that. I think my  
 7 team used, you know, our company and the SEE guidelines  
 8 in our evaluation of invoices, but if there was a  
 9 challenge to a charge, the companies agreed to that  
 10 challenge.  
 11 Q I've seen invoices that say that it's  
 12 clearly -- the vendor is not an investor-owned utility.  
 13 They look like they're either a contractor or even maybe  
 14 a subcontractor of an investor-owned utility. Do you  
 15 know what I'm talking about?  
 16 A Yes, sir.  
 17 Q So first of all, within the SEE, would those  
 18 non-IOU vendors be under the agreement that the IOU is  
 19 under?  
 20 A The general stipulations of that, yes, sir.  
 21 Q And that's the rule? So if, I don't know,  
 22 Dominion has a contractor, that contractor follows  
 23 whatever guidelines that Dominion would follow with  
 24 TECO?  
 25 A Just as Dominion's full-time employees would.

1 And is there a hierarchy that you report to  
 2 within the storm organization? In other words, I'm  
 3 sure -- who is your direct supervisor?  
 4 A During Irma it was Thad Lopez, who's now gone  
 5 to be in a different position. And then Beth Young was  
 6 the director.  
 7 Q So in the -- sort of the pyramidal hierarchy  
 8 in an organization in the storm event, Thad and Beth  
 9 would have been your more immediate supervisors?  
 10 A Yes, sir.  
 11 Q Okay. And so is it you and then Beth and then  
 12 Thad, or was it you, Thad and then Beth?  
 13 A Yes, sir, me, Thad and then Beth.  
 14 Q All right. Now, was there anyone else that  
 15 was considered lateral to you in that pyramid that  
 16 reported to Thad as well?  
 17 A I'm sure there were.  
 18 Q What about in terms of interacting with  
 19 vendor, foreign crews and invoices?  
 20 A I had a team of four coordinators, I believe,  
 21 for the storm.  
 22 Q Okay. And can you tell me who they were?  
 23 A They were Mark Tanner, T-A-N-N-E-R;  
 24 Tamara Aponte, A-P-O-N-T-E; Blake Andrews -- Blake  
 25 Andrews --

1 Q Okay. I think we're going to probably come  
 2 back to some of this. I'm just trying to get a higher  
 3 level of you. But I want to go back to the start of the  
 4 Hurricane Irma process.  
 5 When -- so what happens? I mean, you don't  
 6 just self-start. Does someone send a memo out to the  
 7 group and say, start all your processes, whether it's  
 8 you or Carlos? Whatever your role is in storm duty,  
 9 start doing this now? Is that how it happens?  
 10 A That's pretty much it. We start off -- a  
 11 storm call is called, and that's where we start a  
 12 two-a-day conference call to gain the status of,  
 13 basically, the company personnel.  
 14 Q So somebody higher up the line makes the call  
 15 that we're within the window of where this storm is,  
 16 that we need to start reacting to it; is that right?  
 17 A Yes, sir.  
 18 Q Now, who is it that makes that call that you  
 19 respond to?  
 20 A The Vice President of Energy Delivery.  
 21 Q Who is that?  
 22 A That's Jerry Chasse today.  
 23 Q And spell his name for the --  
 24 A C-H-A-S-S-E.  
 25 Q Okay. Thank you.

1 MS. YOUNG: Andrew Blake.  
 2 THE WITNESS: Andrew Blake. Sorry. And I  
 3 think we had Arlee Jones, A-R-L-E-E Jones.  
 4 BY MR. REHWINKEL:  
 5 Q Okay. So I saw the name of -- I'm drawing a  
 6 blank. He had a III after his name.  
 7 MS. PONDER: Collins.  
 8 BY MR. REHWINKEL:  
 9 Q Collins?  
 10 A Lee Collins is our mutual assistance  
 11 coordinator.  
 12 Q So how does he fit in this hierarchy here?  
 13 A He's kind of at Thad's level, I would say.  
 14 He's the one that coordinates with the different -- with  
 15 the SEE and the different regional mutual assistance  
 16 groups to get the resources.  
 17 Q Okay. So you are this foreign crew  
 18 coordinator?  
 19 A Yes, sir.  
 20 Q And he is the mutual assistance coordinator?  
 21 A Correct.  
 22 Q So what's the -- so I take it that the foreign  
 23 crew coordinator is sort of a subset of the mutual  
 24 assistance coordinator?  
 25 A Yes, sir.

1 Q Explain that to me to the best of your  
2 knowledge.  
3 A Well, we're the feet on the ground, basically,  
4 getting the people in and tracking them in. Especially  
5 in Irma, with so many crews, it would be impossible for  
6 one person to try to get resources and then track those  
7 resources, so we kind of worked hand in hand.  
8 Q Now, are there just two types of crews, native  
9 and foreign?  
10 A Yes, sir.  
11 Q And native is TECO?  
12 A It's either our full-time employees or  
13 contractors, subcontractors that we have on our system  
14 on a day-to-day basis.  
15 Q Now, did you have anything to do with the  
16 native contractor --  
17 A No, sir.  
18 Q -- or subcontractor crews?  
19 A No, sir.  
20 Q Okay. So Mr. Collins, he would -- at a high  
21 level, would he arrange resources and then you would  
22 contact them for the logistics?  
23 A Right. He would go out to, say, the  
24 western -- I'm just -- I don't know the true name of it,  
25 but the western RMAG and give them Tampa Electric's need

1 they going to arrive in a reasonable amount of time to  
2 help our recovery or restoration or not? And from  
3 there, to look at the travel, the cost, their labor,  
4 vehicles, et cetera.  
5 Q When you say "the other coordinator," do you  
6 mean --  
7 A Mark, Tamara.  
8 Q So even though they sort of worked as your  
9 team, did you-all kind of divide the universe up because  
10 there were just so many?  
11 A Yes, sir.  
12 Q Okay. Tell me about the resources that you  
13 got from Emera, both Emera and their -- any  
14 subcontractors or contractors. Were you involved in  
15 procuring them or was that done separately?  
16 A That was done separately.  
17 Q Were those considered native or --  
18 A Foreign.  
19 Q Foreign?  
20 A Yes, sir.  
21 Q Okay. Who handled that?  
22 A We handled them for logistics and travel, but  
23 as far as the contact to bring them in, I'm not sure. I  
24 don't know who did that in the company level.  
25 Q Okay. Do you know who Gerard Chasse is?

1 and ask them if they have any available resources that  
2 could assist, and they would post those resources and he  
3 would give that contact information to us.  
4 Q Is there some kind of bulletin board that you  
5 use?  
6 A There is a bulletin board, but he would send  
7 us a spreadsheet from that bulletin board.  
8 Q All right. Now, who made the decision  
9 about -- well, let's say he put a call out and then, you  
10 know -- I'm just going to speak hypothetically -- he put  
11 a call out for a thousand people in a certain area and  
12 you got 1,500 respondents. Who made the call about who  
13 to hire or who to bring in?  
14 A That would have been great if we had had that,  
15 but we didn't.  
16 Q Okay.  
17 A We put a call out for a thousand and we might  
18 have got a hundred.  
19 Q Okay. So you get a hundred. Do you just take  
20 the whole hundred or does somebody make a decision about  
21 whether just too far away or we didn't like them the  
22 last time they were here or --  
23 A That's part of my job is to, myself and the  
24 other coordinators, to contact them, find out what their  
25 travel time to station is. Is it going to be -- are

1 A Yes. That's Chasse. That's our --  
2 Q Oh, okay.  
3 A -- vice president.  
4 Q So it's two s's?  
5 A Yes, sir.  
6 Q Okay. All right. Who would have reviewed for  
7 appropriateness of the charges of the Emera invoices and  
8 receipts? Would that have been you?  
9 A Yes, sir, my group.  
10 Q All right. So, just so I try to get a picture  
11 of what you did and to the level you had discretion in  
12 making decisions about who to bring down, did you --  
13 let's just hypothetically say you got a crew from Texas  
14 to respond and they gave you the particulars. They  
15 said, We've got this many people, we've got this many  
16 vehicles of this type and we have this many linemen and  
17 it will take us, you know, four days to get there and  
18 we're going to have to spend the night, one or two  
19 nights. Who estimated the cost of that? Do you have  
20 some kind of formula or do you have a program that you,  
21 kind of, gives you a rule of thumb?  
22 A Kind of a rule of thumb back-of-an-envelope  
23 calculation, kind of do, you know, manpower cost of -- I  
24 guess you would call it a weighted cost with vehicle and  
25 men.



1 Q And manpower?  
 2 A Right.  
 3 Q Okay. So was there a formula that you used  
 4 for that to give you sort of a swag estimate?  
 5 A I don't think we did it right off the front  
 6 because we were so desperate for getting crews and  
 7 getting them committed to us.  
 8 Q So let's say you had the option of three  
 9 crew -- or three vendors that had 175 people and you  
 10 estimated their time of arrival and their cost and their  
 11 needs. Did you summarize that and give it to somebody  
 12 up the line and say, Here are some options that I have,  
 13 here are my recommendations, and then they made the  
 14 final call?  
 15 A We would hope that that would be the way that  
 16 it would work, but we didn't have that option during  
 17 this storm. We did have -- I think it was either [REDACTED]  
 18 or [REDACTED] where the people were going to be on  
 19 double time from the moment we committed for them. And  
 20 so in those cases, if there was, like, an exception, we  
 21 would -- I would take that to Thad Lopez for his  
 22 approval, disapproval, and he probably would take it up  
 23 chain from there.  
 24 Q Okay. So, just so I understand what you just  
 25 said to me, I think I do, you probably had some latitude

1 charging time?  
 2 A Most of the companies I have found over the  
 3 years are pretty responsible and respectful of the  
 4 utilities, and, you know, some will say, Okay, I've got  
 5 this e-mail that says at 12:01 I'm committed, so that's  
 6 where I'm going to start charging. Others will say,  
 7 We're not going to travel until tomorrow morning at  
 8 6:00 a.m.; we'll charge you for 12 hours of mobilization  
 9 time ahead of that, but our travel date starts at  
 10 6:00 a.m., so our mobilization is 6:00 p.m. tonight.  
 11 Q Okay.  
 12 A And most of the contractors and utilities I've  
 13 dealt with over the last 14 years have worked that way.  
 14 Q And I take it that there was a level of  
 15 exigency in the Irma situation where you e-mailed if you  
 16 could, but sometimes it was a phone call?  
 17 A Some -- it was very fast-paced, very dynamic.  
 18 Again, I want to say -- I still don't have a number in  
 19 my head of how many crews we actually had. I'm pretty  
 20 sure over 2,300 people and multiple calls to vendors and  
 21 contractors and coordination.  
 22 Q Did you maintain a spreadsheet that said, you  
 23 know, for all the vendors, when they were engaged to  
 24 mobilize?  
 25 A We maintained a spreadsheet and we did it on a

1 if they met sort of within a band of criteria and they  
 2 were available and you said, Come on down?  
 3 A Yes, sir.  
 4 Q But if you had the situation where right off  
 5 the bat they're going to be charging, you know, \$200 an  
 6 hour instead of, you know, \$115 or whatever the rate  
 7 would be, and you looked at that price and it sort of  
 8 started to get eye-opening, you would send that up to  
 9 Thad --  
 10 A Yes, sir.  
 11 Q -- and he or somebody further up would make a  
 12 call?  
 13 A Yes, sir.  
 14 Q Okay. Now, did you have, pretty much, final  
 15 authority to tell a crew, Come on"?  
 16 A I'm not sure that you would call it final  
 17 authority, but myself or one of the coordinators would  
 18 be the ones to say, Yeah, mobilize.  
 19 Q Okay. Now, when you said that to a crew, did  
 20 you send them an e-mail saying, We agree?  
 21 A We tried to do that. I'm not sure that that  
 22 happened in every instance.  
 23 Q Okay. If you sent them an e-mail that says,  
 24 We accept your terms and your 75 workers, please come,  
 25 is that what they used to decide when they started

1 daily basis, so we would have to -- you know, there was  
 2 a version per day. And so I'm sure some version has  
 3 those mobilization dates on it.  
 4 Q Well, at some point it seemed like you would  
 5 have to take a document and measure the invoice against  
 6 what you had agreed to --  
 7 A Right.  
 8 Q -- with the vendor as when they were going to  
 9 come down and when they were going to arrive, and I  
 10 guess you don't always know when they're going to leave,  
 11 but is that correct?  
 12 A Yes, sir.  
 13 Q So is there a document out there that was  
 14 final that you measured all of the invoices and the  
 15 charges against?  
 16 A I'm not sure there's a consolidated document  
 17 like that. We do have a spreadsheet where we checked  
 18 the times against, you know, e-mails, spreadsheets,  
 19 working files and the cost.  
 20 Q Okay. Let me just pause here for a second  
 21 with the questions and something I didn't really address  
 22 at the outset of the deposition.  
 23 There were some documents that I requested  
 24 that you bring to the deposition today in the notice.  
 25 Are you familiar with that?

1 A I'm not sure.  
 2 MR. REHWINKEL: Okay. Let's go off the record  
 3 for just a second.  
 4 (Discussion off the record.)  
 5 MR. REHWINKEL: All right. So back on the  
 6 record.  
 7 (Exhibits 1 and 2 were marked, respectively,  
 8 for identification.)  
 9 BY MR. REHWINKEL:  
 10 Q Off the record, we at a high level sort of  
 11 identified these documents that you used to evaluate  
 12 vendors during the storm and after the storm -- and  
 13 after the storm for evaluation of their invoices; is  
 14 that fair?  
 15 A Yes, sir.  
 16 Q Okay. And one of the documents that you  
 17 brought with you today per our request was a large  
 18 spreadsheet that is the final version of your  
 19 line-clearing vendors with some non-final information  
 20 from tree trimming and damage assessment crews; is that  
 21 right?  
 22 A Yes, sir. The line crews were my area of  
 23 responsibility.  
 24 Q Okay. And so this large spreadsheet that is  
 25 square in size -- and we're going to identify that as a

1 did we call that? Preliminary Foreign Line Crew  
 2 Spreadsheet?  
 3 A (Nods head.)  
 4 Q Okay. Exhibit 2, tell me a little bit about  
 5 how you used that document or a similar version of it.  
 6 Were there several versions of it?  
 7 A There were at least daily versions, and as --  
 8 if this was -- this sheet was updated --  
 9 MR. WAHLEN: And you're referring to  
 10 Exhibit 2.  
 11 A I'm referring to Exhibit 2. It was updated by  
 12 multiple coordinators. And so if they felt that it  
 13 needed to be saved, you know, it was renamed or maybe  
 14 date and time on it, on that new version, but it was a  
 15 dynamic document.  
 16 BY MR. REHWINKEL:  
 17 Q What is the date of that one, if you can tell,  
 18 that one, Exhibit 2?  
 19 A I think this is 9/17. September 17th, 2017.  
 20 Q Okay. That was nearing the end of your  
 21 engagement of foreign crews; is that right?  
 22 A Yes, sir. Well, it says 9/15, but I'm pretty  
 23 sure that this would have been 9/17.  
 24 Q Okay. So the title may not square -- or the  
 25 naming convention may not square with the --

1 deposition exhibit that we've given the title of Final  
 2 Foreign Line Crew Spreadsheet. Do you know what I'm  
 3 talking about --  
 4 A Yes, sir.  
 5 Q -- if I ask you about that?  
 6 And another large spreadsheet that -- and  
 7 there are two smaller documents attached to them that  
 8 have information about foreign tree trimming and damage  
 9 assessment crews, but you're not responsible for those,  
 10 and I think you told me off the record that those are  
 11 not final like the line crews.  
 12 A Correct.  
 13 Q Okay. The other spreadsheet is a two-page,  
 14 probably 11 x 17 spreadsheet that shows similar  
 15 information to Exhibit 1, with some contact information  
 16 and dates and times associated with the foreign crew  
 17 vendors. Is that fair?  
 18 A Yes, sir.  
 19 Q And I think you said to me that that was a  
 20 document -- a working document that you used during the  
 21 storm that was not final like Exhibit 1; is that right?  
 22 A Correct.  
 23 Q Okay. Can you tell me a little bit at a  
 24 general level -- let's take Exhibit 2 first, the  
 25 preliminary -- oh, and we gave that a title of -- what

1 A Actual --  
 2 Q -- the actual date that it was used?  
 3 A Correct.  
 4 Q And so did you pick that one out of -- is that  
 5 the only one that was in there, or is that just a  
 6 version that you thought was the most up to date of --  
 7 A It was a version. I'm not sure.  
 8 Q Okay.  
 9 MR. WAHLEN: Charles, we have others if you  
 10 want them. There's a bunch of them.  
 11 MR. REHWINKEL: Yes.  
 12 MR. WAHLEN: We figured it would be better to  
 13 give you a look at these, and then if you decide  
 14 you want to see --  
 15 MR. REHWINKEL: Okay.  
 16 MR. WAHLEN: -- 14, 13, 10, whatever, we can  
 17 get them to you. But rather than go through this  
 18 exercise with the big documents --  
 19 MR. REHWINKEL: I appreciate that.  
 20 MR. WAHLEN: -- we wanted to give you an  
 21 example.  
 22 MR. REHWINKEL: We could spend all day on the  
 23 logistics of this.  
 24 MR. WAHLEN: Right.  
 25

1 BY MR. REHWINKEL:  
 2 Q Okay. So what --  
 3 MR. MOYLE: Can I just clear -- Exhibit 1 that  
 4 you're referencing is the exhibit on the screen  
 5 now? So that, for example, on line 16 it says [REDACTED]  
 [REDACTED] is that right?  
 7 MS. YOUNG: Exhibit 2.  
 8 THE WITNESS: This is Exhibit 2 that we're  
 9 looking at. But yes, that should be [REDACTED]  
 10 [REDACTED]  
 11 MR. REHWINKEL: Yeah, Jon, I think they put up  
 12 the document I was asking about.  
 13 MR. MOYLE: Okay. Thank you.  
 14 BY MR. REHWINKEL:  
 15 Q All right. So with respect to Exhibit 2, what  
 16 did you primarily use it for during the actual storm  
 17 restoration event?  
 18 A Well, prior to it was the contact names,  
 19 numbers, et cetera; for the different utilities,  
 20 estimated arrival date or the date that they actually  
 21 arrived on site; if they were on site, where they were  
 22 going to; and then any notes that the coordinator felt  
 23 were pertinent to the contractor or the --  
 24 Q Okay. Let's go, if you can, to Exhibit 2 and  
 25 to the second page of it, which is tab 2, and it has

1 Resources and especially the [REDACTED] and the [REDACTED]  
 2 [REDACTED] those are damage assessors that those companies  
 3 said that were available to Tampa Electric.  
 4 Q Okay. So that wouldn't be in your purview; is  
 5 that right?  
 6 A Yes, sir, that's correct.  
 7 Q Okay.  
 8 A But if you go on down to -- there's another  
 9 line for [REDACTED] It's probably like the tenth or  
 10 eleventh line down.  
 11 Q Okay. They have 16 distribution.  
 12 A Correct. That would have been what I was  
 13 interested in.  
 14 Q All right. So those are linemen --  
 15 A Yes, sir.  
 16 Q -- that do line clearing?  
 17 A Yes, sir, or line restoration.  
 18 Q Restoration. Okay.  
 19 And so let's use that line, that [REDACTED]  
 20 line. Let's go all the way across and we see assigned  
 21 date --  
 22 MS. YOUNG: Can you pause for one minute so  
 23 she can --  
 24 MR. REHWINKEL: Yes.  
 25 MS. YOUNG: -- let them know exactly where

1 responding company at the top and then it has the  
 2 company name, contact name, contact e-mail, and then  
 3 phone number, and then some other data points. Do you  
 4 see that?  
 5 A Yes, sir.  
 6 Q All right. So just for an example, let's  
 7 take -- well, let's just take the first one, which is  
 8 [REDACTED]  
 9 A Yes, sir.  
 10 Q Is that somebody you dealt with directly?  
 11 A No. Lee Collins would have dealt directly  
 12 with him.  
 13 Q So we have his contact number, and then  
 14 under -- well, I'll tell you what. Let's go to [REDACTED]  
 15 [REDACTED]. Everything is the same except the name.  
 16 [REDACTED] is the contact, same phone number. And then  
 17 it says, "Matched Resources," and we see zero for  
 18 distribution, zero for transmission, and 24 for damage.  
 19 What does that mean?  
 20 A That means that those resources -- this is a  
 21 match log from -- I think this one is actually from the  
 22 Southeastern Electric Exchange because the Assigned By  
 23 column has S. Smith in it. That would be Scott Smith,  
 24 who is the executive director of the Southeastern  
 25 Electric Exchange. And so those resources under Matched

1 you're at?  
 2 Wes, can you --  
 3 THE WITNESS: Match log.  
 4 MS. YOUNG: So you're on a different page.  
 5 Okay.  
 6 THE WITNESS: And then this line here.  
 7 BY MR. REHWINKEL:  
 8 Q Right there, 14.  
 9 A Maybe.  
 10 Q Yeah.  
 11 A That's it, correct, or next line up.  
 12 Q Yes, next line up.  
 13 MR. REHWINKEL: I'm sorry. So we had the 16.  
 14 Can you go up one?  
 15 MS. YOUNG: Just highlight 13.  
 16 BY MR. REHWINKEL:  
 17 Q All right. So there are 16 line restoration  
 18 people from [REDACTED]. What's the difference  
 19 between the 16 there and the 11 below? Oh, those are  
 20 probably contractors?  
 21 A Yes, sir.  
 22 Q Okay. All right.  
 23 A And that's one of the confusing things that  
 24 happens during the storm is you have multiple -- because  
 25 the contractors are assigned to a utility, they may come

1 in under that utility, but then they may have their own  
 2 billing and everything from it.  
 3 Q Okay. So when we look at [REDACTED] and the  
 4 16, [REDACTED] is the -- is on line 13, but [REDACTED] is a  
 5 contractor to [REDACTED]?  
 6 A Yes, sir.  
 7 Q All right. So when I see -- let's stay on the  
 8 IOU line, the [REDACTED] with a 16.  
 9 We go across and assigned date-time, is  
 10 9/9/2017, 1:28 EST. Is that 1:28 a.m.?  
 11 A Yes, sir.  
 12 Q Okay. So is this when you would expect them  
 13 to start billing time for mobilization?  
 14 A That was the date that they agreed to be --  
 15 send resources to Tampa Electric, but that may not be  
 16 the date that they actually started invoicing.  
 17 Q All right. So what does match type mean? It  
 18 says -- they all say "company."  
 19 A Just matching completed.  
 20 Q Okay. And what is calculation run?  
 21 A I'm not sure.  
 22 Q That's the same date, but about 12 hours, 11  
 23 hours later.  
 24 A Right.  
 25 Q Okay. That's not something you used for

1 A No, sir, not with Irma.  
 2 Q What we see, if I look in the Matching Status  
 3 column, I see a couple of deleted. [REDACTED]  
 4 maybe and [REDACTED]  
 5 A I believe that those were --  
 6 Q Or [REDACTED].  
 7 A I believe that those were companies that  
 8 possibly initially offered up resources, but then  
 9 decided that maybe they couldn't support that, and so  
 10 those were deleted.  
 11 Q Okay.  
 12 A We never contacted.  
 13 Q So it looks like -- oh, [REDACTED] is  
 14 that a company that you didn't ultimately --  
 15 A No, sir, we didn't.  
 16 Q Okay. S [REDACTED] didn't work for  
 17 you guys?  
 18 A Yes, sir.  
 19 Q Okay. All right.  
 20 THE WITNESS: Were you able to hear me?  
 21 COURT REPORTER: Yes.  
 22 BY MR. REHWINKEL:  
 23 Q So let's go back to the first page of  
 24 Exhibit 2, and in the -- on my copy, the far left column  
 25 says Workers and then Total People. What are those

1 anything?  
 2 A No, sir.  
 3 Q All right.  
 4 A We were primarily interested in the number of  
 5 people and the contact information.  
 6 Q All right. So this assigned date-time column,  
 7 would that in any way be used as a guide for -- if you  
 8 saw a spreadsheet -- I mean an invoice and timesheets  
 9 that matched this, would you say, well, they could have  
 10 started billing time then?  
 11 A Yes, sir. I mean, that would be the earliest  
 12 possible time that we would expect any invoice time to  
 13 begin.  
 14 Q Okay. It doesn't mean that they would do that  
 15 based on an answer you gave me earlier? Some people --  
 16 A Right.  
 17 Q -- will wait a little bit longer until they're  
 18 actually ready to start traveling?  
 19 A Yes, sir. Their mobilization time is the time  
 20 that they start billing.  
 21 Q Okay. But if you saw a -- the only thing you  
 22 would use this for really that would raise a red flag is  
 23 if you saw them billing time in advance of this time?  
 24 A Yes, sir.  
 25 Q Okay. Did you ever encounter that?

1 columns supposed to --  
 2 A Workers are supposed to be the number of  
 3 actual line restoration assets, linemen, either  
 4 apprentice or journeyman.  
 5 Q Okay.  
 6 A But a company may have mechanics, safety  
 7 people, foremen, you know, non-direct assets that they  
 8 bring are non-line restoration assets that they bring to  
 9 help, you know, maintain their crews, their vehicles,  
 10 et cetera.  
 11 Q Okay. So if we look -- if you go down, I  
 12 don't know, it looks like a dozen lines to [REDACTED]  
 13 [REDACTED], I see, it says Workers 90, total  
 14 people 94. That would be an example of you have 90  
 15 people who can actually restore service and then four  
 16 others who are in some sort of support or supervisory  
 17 role?  
 18 A Yes, sir. Usually mechanics, vehicle  
 19 mechanics or safety personnel or a foreman that is there  
 20 for supervision.  
 21 Q Okay. When you see a foreman on a timesheet  
 22 or on a crew, did some of the foremen actually count as  
 23 workers?  
 24 A Yes, sir.  
 25 Q Okay. But there were some foremen who --

1 A Were just in a pickup truck.  
 2 Q Okay. And they went around, they might have  
 3 multiple four- or six-member crews and they'd go around  
 4 making sure --  
 5 A Yes, sir.  
 6 Q -- they were doing what they were supposed to  
 7 be doing?  
 8 A Yeah, as far as I know. I wasn't in the  
 9 field, but that was -- that was the concept.  
 10 Q Okay. And so we see Responding Company,  
 11 company name. That's similar to what we looked at on  
 12 the second page of this exhibit. And then we see Notes,  
 13 and these Notes look like they have information about  
 14 when they're going to leave or maybe when they're going  
 15 to arrive?  
 16 A Yes, sir. Anything that a coordinator would  
 17 feel is pertinent to it.  
 18 Q All right. And then let's go back up to the  
 19 very top, the yellow line with the headings, and see if  
 20 you can just identify for me what I'm seeing. What  
 21 is -- does that say IB?  
 22 A Incident base.  
 23 Q Oh, so it's where they're going to be at,  
 24 Plant City or --  
 25 A The fairgrounds.

1 A Eastern Service Area.  
 2 Q Where was that?  
 3 A That's 78th Street, Palm River area.  
 4 Q Okay. Did we do -- PC, is that Plant City?  
 5 A It should be Plant City Service Area.  
 6 Q Okay. Is that different from the Strawberry  
 7 Festival?  
 8 A Yes, sir. Usually that was different.  
 9 Q All right. Are there any other incident bases  
 10 than these?  
 11 A The WH is Winter Haven.  
 12 Q Yes.  
 13 A I don't think we opened any others, but there  
 14 is a possibility that others could be opened.  
 15 Q Okay. And then in the next column, SEE is the  
 16 Exchange?  
 17 A Yes, sir. We tried to track from the  
 18 beginning, you know, which crews were going to be  
 19 subject to that SEE because in the past we've had  
 20 different release criteria for them.  
 21 Q "For them" meaning non-SEE crews?  
 22 A Versus SEE crews. The SEE crews in the past  
 23 had to be released directly by the Mutual Assistance  
 24 coordinator, Lee Collins, where I would handle the  
 25 release for all the non-SEE crews. But we've since --

1 Q The fairgrounds. That's the strawberry  
 2 fairgrounds.  
 3 What are the other incident bases? Winter  
 4 Haven?  
 5 A Winter Haven. CSX was Western Service Area.  
 6 DT was dog track.  
 7 Q That's in Tampa?  
 8 A Yes, sir, on Nebraska Avenue.  
 9 Q All right. And then SF?  
 10 A SF?  
 11 MR. LARUSSA: Strawberry Festival.  
 12 THE WITNESS: Strawberry Festival grounds.  
 13 BY MR. REHWINKEL:  
 14 Q So FG and SF are the same?  
 15 A No. Fairgrounds --  
 16 Q Oh, fairgrounds. Okay.  
 17 A Yes, the state fairgrounds at Highway 301 and  
 18 I-4.  
 19 Q Okay. What is WSA?  
 20 A Western Service Area.  
 21 Q And that's the same as CSX or --  
 22 A Yes, sir. There were crews at both, just  
 23 depending on how the incident-base manager assigned and  
 24 used them.  
 25 Q All right. And then ESA?

1 the next storm that occurs, the foreign crew coordinator  
 2 would release everyone and document that.  
 3 Q Okay. So for Irma, if it said SEE, Lee would  
 4 be the final authority on releasing them?  
 5 A Yes.  
 6 Q And every one of these that has a blank in  
 7 that column is you?  
 8 A Yes, sir.  
 9 Q And that's how you did it?  
 10 A Yes, sir.  
 11 Q Okay. Now, would you be aware that Lee had  
 12 released crews? I assume you had to, kind of, work  
 13 closely on that, right?  
 14 A Yes, sir. Right.  
 15 Q Now, who told you about whether to release a  
 16 crew or not? Did you consult somebody higher up and  
 17 say, Can we let these guys go today and --  
 18 A Sometimes we did if we got notice that, you  
 19 know, a crew was finished with their work and they  
 20 didn't have anything. Like I stated earlier, there were  
 21 two-a-day conference calls and then Resource Planning  
 22 had an additional conference call. So in those  
 23 conference calls we would be aware of the status of the  
 24 restoration.  
 25 So toward the end, yes, we would contact

1 Thad Lopez or Beth and say, you know, Crew X, Y, Z has  
2 finished their work, can we release them, or has a  
3 release time, do you have other plans for them?

4 Q Okay.

5 A But yeah, it was -- we tried to be proactive  
6 and responsive to Resource Planning.

7 Q I'm looking over here. So you have -- the  
8 next two columns are Arrival Date and Arrival Time. And  
9 then there's Release Date and Time. There's nothing  
10 there except for, it looks like, five crews down near  
11 half, you know --

12 A And those -- yeah, those were [REDACTED] and  
13 [REDACTED] crews, transmission  
14 primarily, that were released as soon as there was no  
15 more transmission work.

16 Q All right.

17 A And I don't think the release time ever got  
18 populated on this sheet because we pretty much mass  
19 released people on September 17th.

20 Q All right. Were there different standards  
21 about when to pay, you know, what expenses were paid  
22 post release based on the crews or whether there were  
23 SEE or not?

24 A Not according to the Mutual Assistance Group.  
25 I think where you -- what you're asking me is if -- how

1 MR. REHWINKEL: Okay.

2 MR. WAHLEN: Can we go off record for just a  
3 second?

4 MR. REHWINKEL: Yes. Let's go off the record.  
5 (Discussion off the record.)

6 MR. REHWINKEL: I want to go back on the  
7 record and identify the response to OPC POD  
8 Number 14 as Exhibit Number 3, and we'll call it  
9 POD 14.

10 (Exhibit 3 was marked for identification.)

11 BY MR. REHWINKEL:

12 Q And just for purposes of the questions here,  
13 if you could turn to page 3, Mr. Caldwell. And before  
14 we went off the record, we were talking about the  
15 release times for the vendors for the line crews. And  
16 these are the foreign line crews, correct?

17 A Yes, sir.

18 Q And so pages 3 and 4 are the line crews, and  
19 page 5 is -- it says Tree Services and Damage Assessors;  
20 is that right?

21 A Yes, sir.

22 Q Okay. And so is this document what you would  
23 use to determine whether a crew that was continuing on  
24 to work for another utility in Florida or another  
25 utility as a part of this trip they're on, whether they

1 long did we pay after the release. If it was -- if they  
2 were going to be assigned to another utility, they were  
3 going to work for another utility, it was the release  
4 time, and that's when our financial obligation would  
5 stop. If they were being released to return to their  
6 home location, then we would pay for until they got back  
7 to their home location.

8 Q Is there anything on this or any other  
9 documentation that says -- that kept track of when a  
10 crew was going to go to another utility? Did you always  
11 know whether they were or not?

12 A I'm sure there were instances when we didn't  
13 know, but we did keep track of that. I think you should  
14 have received a release document where we submitted  
15 those times and dates or -- yeah, dates and times  
16 according to the e-mails that were sent.

17 MR. REHWINKEL: Is that something that's in  
18 the latest production, Jeff, do you know?

19 THE WITNESS: I think --

20 MS. YOUNG: Yes.

21 THE WITNESS: You should have received that.  
22 You may be receiving it in Tallahassee today.

23 MR. REHWINKEL: Okay. Is that something that  
24 you brought with you today?

25 MS. YOUNG: It's on the cart.

1 should be paid for services after this time?

2 A We would have used this or something like it  
3 to --

4 Q Whatever the source for this was?

5 A Right, to -- as far as the release date and  
6 time, and then we would need e-mail or something else to  
7 say if they were going to FPL or to Duke or to home  
8 location.

9 Q Okay. And are there e-mails that were  
10 produced that show that in the production that you made  
11 that are responsive to this?

12 A No, sir.

13 Q Okay. Do you still have those e-mails as far  
14 as whether a utility was going on to work for FPL?

15 A I'm sure I do.

16 Q Okay. Now, if you didn't have evidence that  
17 they were going to work for FPL or Duke or another  
18 utility, then it would be a presumption that you would  
19 pay demobilization?

20 A Yes, sir.

21 Q And that's from the time of release to the  
22 time they arrive back at their home location?

23 A Wherever they started their travel originally.

24 Q Okay. All right. So can you tell me what  
25 role you had in establishing or otherwise putting in

1 place provisions for verifying vendor activities in the  
 2 field?  
 3 A I really had no responsibility for what the  
 4 vendors did.  
 5 Q Who would have that responsibility?  
 6 A Well, the assignment would initially come, I  
 7 believe, from Resource Management, but then the  
 8 managers' line supervisors at the different incident  
 9 bases were would assign the work to the different crews.  
 10 Q So who is responsible for verifying that the  
 11 crews did the work that they were asked to do or that  
 12 they recorded time for?  
 13 A That would be the line supervisors or incident  
 14 base manager.  
 15 Q What would be the process for you receiving  
 16 information about verification of work performed?  
 17 A As far as hours or worked or --  
 18 Q Well, let me step back and ask this. At some  
 19 point you reviewed invoices for payment?  
 20 A Correct.  
 21 Q Now, you didn't -- I would assume other  
 22 than -- if an invoice was above \$10,000, you weren't a  
 23 final approval for payment; is that right?  
 24 A Correct.  
 25 Q Did you do things regardless of the value of

1 Q Okay. Now, did somebody log in everybody?  
 2 Did they check a roster and say, you know, these 180  
 3 people reported to this base and they check off their  
 4 name and then they check them off when they came back?  
 5 A I don't know that that happened.  
 6 Q It didn't happen anywhere, or was it a  
 7 situation that --  
 8 A I do not know.  
 9 Q Okay. Now, I've seen your name -- and we'll  
 10 probably look at some examples of it. I've seen your  
 11 name on timesheets and it looks like an electronic  
 12 signature. Is that something -- did you review any  
 13 timesheets realtime, meaning the days of the storm  
 14 restoration process?  
 15 A Sometimes I think a contractor said that for  
 16 their pay system they had to have a signed timesheet.  
 17 So they would electronically send me the timesheets and,  
 18 yeah, I would attach my signature to them and send them  
 19 back.  
 20 Q So would you do that the day of the -- or the  
 21 day after?  
 22 A Sometimes. I mean, yes. You know, it's been  
 23 ten months now, but yeah. Usually it was within a day  
 24 or two of their work. It wasn't, you know, like, we're  
 25 two months out and can you sign these.

1 the invoice that for your level of review you said, I've  
 2 reviewed this and it's okay, and you sent it up the  
 3 chain? Is that how it worked?  
 4 A Yes, sir.  
 5 Q Okay. For you to verify whether a crew, you  
 6 know, worked 70 hours in a week, 30 hours of overtime  
 7 and 40 hours of double time, what did you rely on for  
 8 the veracity of the reports?  
 9 A Everything during the storm is based on a  
 10 16-hour day. All of our logistics, picking the crews up  
 11 at their lodging, providing them their breakfast, their  
 12 work start, and then the buses back to the lodging at  
 13 night, it's a 16-hour day. And so we pretty much base  
 14 everything on that. And so the assumption is they're  
 15 going to be working 16 hours, at least, that day.  
 16 Q Okay. So, now, did every crew go to the  
 17 staging area, the incident base, and did they get in  
 18 vehicles and go out to where they were assigned and then  
 19 return and everybody get on a bus and go back to the  
 20 lodging?  
 21 A Pretty much, because the lodging areas didn't  
 22 have space for line trucks, et cetera, to park there.  
 23 Q Okay. So was it a situation where there was a  
 24 default presumption that the crew worked 16 hours?  
 25 A Yes, sir.

1 Q Okay. So it was contemporaneously within the  
 2 bounds of reason? In other words --  
 3 A Yes.  
 4 Q -- you were doing a lot of things, you  
 5 didn't --  
 6 A Right.  
 7 Q Okay.  
 8 A And to be fair, sometimes, you know, because I  
 9 tried to get service area supervisors or line  
 10 supervisors to handle that, and the crews a lot of times  
 11 couldn't find them after -- after they had completed  
 12 their 16-hour days because those people had gone home,  
 13 too.  
 14 Q Yeah. So in that case, they turned to you  
 15 and --  
 16 A Yes, sir.  
 17 Q -- you were the one that had to do it? Okay.  
 18 I think you called them line supervisors.  
 19 They're the ones that were responsible for monitoring  
 20 and verifying time worked?  
 21 A Yes, sir.  
 22 Q Did they do the same with respect to vehicle  
 23 utilization?  
 24 A Yes, sir, to my knowledge.  
 25 Q Now, the vehicles are a little different than

1 people arriving and getting on buses and going back to  
2 the hotel. Was there a default presumption about the  
3 vehicles or was there a verification process in place  
4 there?

5 A I think there was a default assumption. There  
6 were some vehicles because some of the line assets were  
7 coming directly from Hurricane Harvey and some of the  
8 contractors had deep-water equipment, we felt we didn't  
9 need it. And so when we saw that on the vehicle  
10 rosters, we would contact that contractor and say, you  
11 know, Can you leave it? We don't need it. We don't  
12 want to be charged for it. And they would say, Well, we  
13 don't have anywhere to leave it. We'll bring it, but we  
14 won't charge for it unless we wind up using it.

15 And there was one instance where they did wind  
16 up using a tracked vehicle, but I think that was the  
17 only tracked vehicle we paid for.

18 Q Okay. I'm probably going to ask you about  
19 this later in the day, but there's a crew out of  
20 Louisiana that brought a log skidder and a Mantis crane,  
21 and I don't know how far they brought it, but they  
22 arranged payment for escort charge and certain states  
23 that required it.

24 A Right.

25 Q Is that something that you-all asked them to

1 vehicle rosters and rate sheets for your role in  
2 approving invoices; is that fair?

3 A Yes, sir.

4 Q So was there something that -- did you have  
5 all the crew rosters at your disposal? Was there a  
6 binder that you had that had them all in it?

7 A Electronic.

8 Q Okay.

9 A On a shared drive.

10 Q So this roster had, by man, everybody that was  
11 supposed to be working and what days?

12 A Yes, sir.

13 Q Okay. And was it populated by the default  
14 presumption that they worked the 16 hours?

15 A Well, the rosters -- the timesheets for the  
16 invoicing would have been supplied by the contractors  
17 and they would have either actual hours, or if it was an  
18 inclusive rate, then they would have that. You know, it  
19 would be basically a 16-hour or 24-hour day, whatever  
20 was, you know -- but yes, that would be by man, but that  
21 would be sent with the invoice package.

22 Q Okay. So your roster was just the name of the  
23 person and when they started and when they stopped?

24 A Basically, our roster that we had in that  
25 working file was just the name of the person, and we

1 bring?

2 A No, sir.

3 Q Okay. I assume you didn't need a Mantis crane  
4 during the process?

5 A I don't know, but, you know, I remember back  
6 to Charley and Frances where we wound up having heavy  
7 cranes work the areas because there was so much damage.

8 Q Usually it was because of a transmission pole  
9 or tower down, right?

10 A Yes.

11 Q Okay. Did TECO keep an up-to-date or realtime  
12 roster of all the foreign crews that were working in  
13 restoration?

14 A By man or by company?

15 Q Just overall. I mean, was there a roster that  
16 you kept track of how many people were working for you  
17 every single day and by what crew?

18 A Pretty much, that would be Exhibit 2.

19 Q Okay. So there wasn't anything by man?

20 A Not at our level. Not at the foreign crew  
21 coordinator level.

22 Q Okay. I think early on in the process you  
23 talked about after the invoices were received, you  
24 verified that they did the work, that they did respond  
25 to your call, and you checked against crew rosters,

1 would have either relied on the default assumption 16  
2 hours or a timesheet if we received it.

3 Q And you said an inclusive rate. What does  
4 that mean?

5 A There was one contractor that had -- didn't  
6 charge separately for vehicles or man-hours. They  
7 charged basically a flat rate for per person and that  
8 included the vehicle and the person.

9 Q This was just one vendor out of all of them?

10 A Yes.

11 Q Do you know who that was?

12 A [REDACTED] I think.

13 Q All right. And that's an IOU, isn't it?

14 A No, sir.

15 Q No, it's not? It's a -- okay.

16 How were meals tracked? Was everybody given a  
17 meal at the incident base or -- I mean, people didn't  
18 come back to the incident base to eat lunch, did they?

19 A Logistics handled that, but it was my  
20 understanding that for, like, lunches or whatever, they  
21 had runners that would take lunches to the crews in the  
22 field.

23 Q Now, did some crews provide their own meals  
24 and they didn't use your lunches, or was everyone  
25 expected to be fed by TECO?



1 A It was a logistics. I don't have an idea  
 2 about that.  
 3 Q Okay. Well, would -- in some of the invoices  
 4 during work days, you see crews getting lunch at a  
 5 restaurant or --  
 6 A Yeah.  
 7 Q And so if TECO was providing meals or there  
 8 was a presumption that meals were being provided to  
 9 these crews, why would they be getting separate meals  
 10 reimbursed?  
 11 A Sometimes stuff happens and the runners didn't  
 12 get there or couldn't find the crews or whatever. I'm  
 13 sure that crews went out and purchased their own meals  
 14 for that.  
 15 Q Now, did TECO provide -- how many meals did  
 16 they provide to crews that were working? I would assume  
 17 that breakfast is available before you actually leave  
 18 the incident area; is that correct?  
 19 A Correct.  
 20 Q So crews shouldn't have breakfast during the  
 21 time they record on their timesheet as restoring  
 22 service; is that right?  
 23 A To my knowledge, yes.  
 24 Q All right. What about dinner? What is the  
 25 understanding about dinner?

1 when they were released, how were their trucks field?  
 2 A Again, that's a logistics question, but it was  
 3 my understanding that when they returned to the incident  
 4 base, we would provide fuel. They would be fueled up  
 5 that night.  
 6 Q Okay. So absent them being on some sort of a  
 7 work assignment that used up more fuel than they  
 8 expected, they were basically assigned work in an area  
 9 that should allow them to work their day and then come  
 10 back and get fuel without having to refuel during the  
 11 day; is that fair?  
 12 A That's fair.  
 13 Q I mean, that's a presumption?  
 14 A Yes. I'm sure there were instances where they  
 15 probably had to buy fuel, but that was fair.  
 16 Q So apart from the [REDACTED] exception, everyone  
 17 else with respect to fuel and meals would be operating  
 18 under the generally-accepted MUA terms of you providing  
 19 the meals at the incident base and you providing the  
 20 fuel?  
 21 A Yes, sir, I believe that's true.  
 22 THE WITNESS: Is that true?  
 23 MS. YOUNG: Pardon?  
 24 THE WITNESS: Is that true?  
 25 MS. YOUNG: That we provide the meals?

1 A The same thing is that it would be available  
 2 at the incident base.  
 3 Q Okay. And it would be available -- it seemed  
 4 like a lot of crews either ended up at 10:00 or  
 5 11:00 p.m., and you would be provisioned at all the  
 6 incident bases to serve sufficient meals to the crews  
 7 that are assigned to that base upon their return; is  
 8 that right?  
 9 A That would be a logistics questions, but yeah,  
 10 that was my understanding.  
 11 Q Okay. Now, were there any vendors that, as  
 12 part of their understanding of mutual assistance or  
 13 whatever arrangement they were under, that they would  
 14 provide their own meals and they weren't going to take  
 15 meals from TECO?  
 16 A I don't know that.  
 17 Q I mean, is it -- nothing comes to mind that  
 18 that was a term or condition?  
 19 A No. There was -- I think it was [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED].  
 23 Q Okay. All right. And how about fuel? Did  
 24 each vendor provide their own fuel? And I'm talking  
 25 about once they checked in and got on your roster until

1 THE WITNESS: Yes.  
 2 MS. YOUNG: Yes. We would send box lunches  
 3 type typically with the meal.  
 4 THE WITNESS: Like I said, that's not my area  
 5 of expertise, and I basically handled or turned the  
 6 logistics over to our logistics coordinator and  
 7 they arrange all of that.  
 8 BY MR. REHWINKEL:  
 9 Q Who would be the logistics coordinator that  
 10 you would interact with?  
 11 A I think the head of that is Audrey Cain.  
 12 Q K-I-N-G?  
 13 A C-A-I-N.  
 14 Q Cain, C-A-I-N. So she's the head.  
 15 Were there any other logistics coordinators?  
 16 A Joe Kikliter. I think that's K-I-K-L-I-T-E-R.  
 17 Q Okay. That's J-O-E, Joe?  
 18 A Yes, sir. I'm sure there's a fuller name.  
 19 Q Okay. It's not a Joanna?  
 20 A No.  
 21 MR. WAHLEN: Charles, a lot of these  
 22 logistical questions Beth will be able to field  
 23 tomorrow.  
 24 MR. REHWINKEL: Okay. I understand.  
 25 MR. WAHLEN: All right.

1 BY MR. REHWINKEL:

2 Q So I think early on in the deposition you  
3 testified about the SEE, let's call them guidelines. Is  
4 that what -- that say under what terms they're going to  
5 provide service and under what terms you're going to pay  
6 for those services? Is that fair?

7 A Yes, sir.

8 Q Were there any other documents beside that  
9 that you used to evaluate whether a company should be  
10 paid for something? I mean, were there specific vendor  
11 arrangements? Like, let me just give you an example of  
12 that. I think you mentioned one vendor had \$20 per  
13 meal, so \$60 per day for meals, and that's just what  
14 they billed.

15 A Right.

16 Q And I think I've seen some vendors bill \$35 a  
17 day flat or \$40 a day flat.

18 A Right.

19 Q Do you recall that?

20 A Yes.

21 Q So are those exceptions to the MUA terms and  
22 conditions, or are they ones that the company when you  
23 first call them up they say, We'll come down, but this  
24 is what we do for fuel, this is what we do for meals?

25 A Sometimes, yes, we had that up-front. [REDACTED]

1 would come from contractors and subcontractors and not  
2 the IOUs?

3 A Pretty much, yes, sir.

4 Q One other general question in that arena on  
5 fuel. I thought I saw some vendors charge a flat fee, a  
6 mileage fee that included fuel. In other words, you  
7 wouldn't see fuel receipts because it would be a vehicle  
8 rental and then so much a mile.

9 A I don't recall seeing that.

10 Q Okay. Is it your understanding that there  
11 weren't any vehicle charges that had fuel included?

12 A I don't recall seeing any of those.

13 Q Okay. So, just so I understand and I think,  
14 sort of, your answer that where you got some surprises  
15 in the invoices, not all terms and conditions or  
16 arrangements were established up-front?

17 A Correct.

18 Q Okay. Has it always been TECO's assumption  
19 that a mutual assistance agreement covers the  
20 contractors and subcontractors of another IOU in the  
21 arrangement?

22 A Yes, sir.

23 Q And when you provide mutual assistance, if you  
24 know the answer to this, to another utility, do you use  
25 contractors as part of that?

1 was one of the ones that sent that up-front. There were  
2 others that we, you know, found out about that when we  
3 received the invoice.

4 Q Okay.

5 A But they -- usually those weren't part of the  
6 SEE agreement.

7 Q And you say you found out about them. You  
8 weren't aware because they didn't tell you, you didn't  
9 ask or --

10 A Yes, sir, both.

11 Q Okay. And is that something that you would  
12 normally -- is there a checklist of things that you  
13 talked to the vendors about, or was there some level of  
14 urgency that those were details that you just didn't get  
15 into?

16 A There was a level of urgency because we were  
17 needing assets and not really being able to secure a  
18 them. But also, what we -- I guess we've been spoiled  
19 by the SEE and the contractors to the Southeastern  
20 Electric Exchange in that we have basically just needed  
21 to secure proof of insurance, manpower rosters and  
22 vehicle rosters. They've been the three big items that  
23 we've needed to secure in the past.

24 Q Is it fair to say that these, if I can call  
25 them surprises on meals and other miscellaneous expenses

1 A I can't say. I don't know.

2 Q Okay. Do you know anything about the process  
3 where TECO provides service on a reciprocal basis?

4 A No, sir.

5 Q Are there guidelines that you have or that you  
6 operate under that require for final approval of  
7 invoices from mutual assistance vendors? Are there  
8 fundamental requirements that you have, such as for the  
9 labor component you have to have timesheets?

10 A Yes, sir.

11 Q For lodging you have to have receipts?

12 A Yes, sir.

13 Q For meals you have to have receipts?

14 A Yes, sir.

15 Q And for fuel you have to have receipts?

16 A Yes, sir.

17 Q Is there any requirement about mileage  
18 traveled or is it only fuel?

19 A It's usually only fuel. You mean a rate per  
20 mile?

21 Q Well, how far they traveled. In other words,  
22 all that matters is what they paid for fuel to travel  
23 down?

24 A Yes, sir. That's all.

25 Q Or to travel back on demobilization?

1 A Correct.

2 Q What about -- I know some investor-owned

3 utilities charge A & G, loading, burden, those kind of

4 things. Are you familiar with that?

5 A Yes, sir.

6 Q Is there any documentation that is fundamental

7 that has to be provided in order to approve those

8 charges?

9 A Usually a statement by the utility that they

10 add 2 percent, 6 percent, whatever, and what that is

11 for.

12 Q So you don't go really beyond that. If that's

13 their A & G rate or their loading rate, then that's what

14 you pay?

15 A Yes, sir.

16 Q In that vein, is it part of your understanding

17 that in a mutual assistance arrangement, that for a

18 contractor of an IOU, that they can add those kind of

19 charges, or are they supposed to just charge for labor

20 and out-of-pocket expenses such as meals, fuel and

21 hotels?

22 A I really don't recall an invoice that had any

23 loading from a contractor; only from utilities.

24 Q So if a vendor had an invoice that had a

25 total, and let's say, hypothetically, of \$15,000 in fuel

1 that axle.

2 Q Okay. So just one last sort of inquiry into

3 the MUA. I think I understand that the MUA that you

4 were operating under, and I guess I'll call it the

5 default MUA, was the SEE; is that right?

6 A Yes, sir.

7 Q Now, if there was a non-SEE IOU or one of

8 their contractors that operated in a MUA that had

9 different terms and conditions than the SEE, would they

10 tell you, We want to be paid under those arrangements,

11 or would they say, We'll agree to the SEE arrangements,

12 or were there instances of both?

13 A No one, you know, talked about another mutual

14 assistance agreement, but they did say that our labor

15 agreement states that our people will be paid or given

16 such-and-such, you know, which was different from what

17 our expectation was.

18 And I want to -- I think it was [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 Q So it wasn't -- they were saying it didn't

24 matter whether they had worked 17 hours the first three

25 days of the week, so then after 23 hours you go to OT.

1 and lodging and then a 10 percent charge on top of that,

2 that would not be something you would expect to see from

3 a contractor?

4 A I don't recall ever seeing that.

5 Q Okay. What were the understandings about the

6 repairs or costs incurred related to vehicles?

7 A Each utility or contractor calculation was

8 expected to take care of routine maintenance, but

9 abnormal, like, one line truck lost an axle, broke an

10 axle, we would take care of that. But like a routine

11 brake job, we would challenge the utility in that or the

12 company on that.

13 Q Does it matter when the axle breaks or the

14 non-routine maintenance incident occurs --

15 A I don't believe --

16 Q -- with respect to whether -- between arrival

17 date and release date?

18 A No, sir. I mean, as long as we're committed,

19 you know, or they have committed to us, then that was

20 the expectation.

21 Q So what would happen if a utility came to you,

22 worked from the 13th to the 17th, got released, and then

23 an axle broke while they were traveling to or working

24 for another utility on the 22nd?

25 A We would expect the other utility to pay for

1 [REDACTED]

2 [REDACTED]

3 Q Okay. Were there any other circumstances like

4 that?

5 A I don't recall any.

6 Q Okay. I thought I saw something about an EEI

7 mutual assistance arrangement. Are you familiar with

8 that?

9 A No, sir.

10 Q Okay. And I think it was from somewhere up in

11 the north or northeast they may have called it that.

12 I think I know the answer to this, but was

13 there any requirement that a vendor be on some sort of

14 pre-approved list before you accepted service from them?

15 A No, sir.

16 Q Did you still -- I know you said it seemed

17 like in a time past all you had to do was get the proof

18 of insurance and the number of crew and some other

19 fundamental details and they'd just come on down, and

20 now it's a little more complicated?

21 A It has been a few times because of -- like,

22 for Irma, it was going to affect most of the state and

23 the track was fairly erratic. And so all the utilities,

24 you know, FPL, Duke, Tampa Electric were all gearing up

25 for the worst. And so assets were becoming really

1 scarce. And so we were going to mutual assistance  
2 groups that we had never really -- you know, Lee Collins  
3 may have talked with them before because he coordinates  
4 and attends conferences, meetings, whatever, with these  
5 other people. But to my knowledge, we had never used  
6 them before.

7 Q Okay. And you didn't -- okay. Did you do --  
8 what proof did you need, aside from, say, [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 what evidence did you require to know whether a crew or  
12 a worker on a crew had worked so many hours before  
13 mobilization began such that you knew whether he had,  
14 you know, 17 more hours of regular time before he got to  
15 the overtime threshold or he had already worked so much  
16 overtime that he was now approaching double time? How  
17 did you --

18 A That was contained in their timesheets, their  
19 personal roster with their invoice package.

20 Q So if a crew worked on Harvey three days  
21 before they mobilized for you and they were already on  
22 double time, what evidence did you need to see that they  
23 were already starting kind of --

24 A Midstream?

25 Q Yes.

1 between mobilization and travel time?

2 A No, sir.

3 Q Okay. So there's mobilization, restoration,  
4 demobilization. Those are the three buckets?

5 A Pretty much. But I don't -- I don't recall  
6 there being different rates for any specific period.

7 Q Okay. So you don't know whether there is a  
8 different time -- there's a different pay rate for when  
9 you're mobilizing versus when you're actually traveling?

10 A No, sir.

11 Q Okay. Now, who made the decision -- let's say  
12 a crew came from [REDACTED] and they started mobilizing on the  
13 9th, and we know that the storm hit sometime on the  
14 11th, right? And it hit on the 11th and later in the  
15 day it sort of moved out of your area. But it seems  
16 like probably people didn't actually start going out  
17 until very late on the 11th or on the 12th; is that  
18 fair?

19 A Yes, sir.

20 Q And this is in broad terms. I'm not trying to  
21 hold you to a specific time.

22 But you have a crew that starts off in [REDACTED] on  
23 the 9th and they can get -- maybe by traveling really  
24 hard, they could get all the way into Florida by late on  
25 the 10th, but you don't know where the storm is actually

1 A I don't think -- I don't recall having that  
2 situation in any of the contractors. It seems like  
3 everything I saw, they -- once they mobilized for us  
4 they started fresh.

5 Q With regular time?

6 A Yes, sir.

7 Q Just as we -- we're going to maybe go into  
8 some more details. What are the -- there's mobilization  
9 time. Is there something called standby time or is  
10 that -- travel time? What are the -- are there -- what  
11 are the terms?

12 A Well, I mean, different utilities, I'm sure,  
13 have different formal names for it, but it's -- we're  
14 pretty much committed to paying those people once they  
15 mobilize.

16 Q All right. So when they get the call like we  
17 looked at in this -- in Exhibit -- I don't know if it  
18 was 1 or 2, we saw the time that they were contacted.  
19 So mobilization could have started at that point, right?

20 A Correct.

21 Q And so there are mobilization all the way  
22 until they checked in, say, at the fairgrounds; is that  
23 right?

24 A Sure.

25 Q So is there any distinction in your mind

1 going to go. So they kind of have to stop at a point;  
2 is that fair?

3 A Yes, sir, and that's -- we want to ensure the  
4 safety of the personnel and their equipment because we  
5 don't want -- you know, like, line trucks don't do well  
6 in winds above 40 miles an hour, and we don't want to to  
7 possibly expose people to a Category 4 hurricane.

8 Q Well, who made the call -- you know, who made  
9 the call about how close to Florida to get and where to  
10 stop and then when to come on down?

11 A The individuals themselves. I mean, as  
12 foreign crew coordinator, I can say press, press, press,  
13 but they're the ultimate responsibility. They have the  
14 ultimate responsibility for their crews, and so --

15 Q So you're saying that you wanted them here as  
16 fast as they could get here?

17 A We would like to have them within 12 hours  
18 after the storm system passes.

19 Q All right. Now, when you first -- or when you  
20 first contacted the crews and agreed that they should  
21 come down, did you at that time have an idea of when you  
22 expected them to get there, how much travel time there  
23 would be?

24 A We asked them their travel -- what their  
25 expected travel time would be.

1 Q Okay. Now, if they said they -- like, you  
 2 called them on the 7th or the 8th and they said, Well,  
 3 we can be there on the 10th, did you ever call them and  
 4 say, We don't know where it's going?  
 5 A Yes, sir.  
 6 Q So how did that process work?  
 7 A It's back and forth on -- you know, as far as  
 8 pay, I don't recall any of them, you know, charging us  
 9 if we called them on the 9th. Well, I do. I think it  
 10 was [REDACTED]. We had to start paying them, even though  
 11 they were basically dry docking for a day or so, to make  
 12 sure that we retained them. Because originally we were  
 13 going to get [REDACTED] from [REDACTED],  
 14 but because [REDACTED] was going ahead and committing to those  
 15 people, they had contractors jump ship, so to speak, and  
 16 go to [REDACTED]. So by the time we committed, we had less  
 17 than [REDACTED].  
 18 Q Is [REDACTED] the only one that poached or did [REDACTED]  
 19 do it too?  
 20 A I can't -- that one just stood out in my mind.  
 21 Q Okay. So did you have other instances where  
 22 you lost commitments?  
 23 A Not that I know of.  
 24 Q Okay.  
 25 A There may have been. I just don't recall any.

1 Q Okay. Did you ever look at, in the invoicing  
 2 and receipts you received from the vendors, at whether  
 3 the people that were traveling and staying in the hotel  
 4 rooms were ultimately people that provided service to  
 5 TECO?  
 6 A I don't think we ever checked it by name or by  
 7 hotel room, but, you know, it was fairly evident that if  
 8 we asked for or they promised 16 people, that they had 8  
 9 to 16 rooms for the night.  
 10 Q So you looked at the number -- did you look at  
 11 the number of people promised in evaluating whether  
 12 their mobilization expenses were reasonable in type and  
 13 amount, or did you look at the roster that ultimately  
 14 you got?  
 15 A I think the promised.  
 16 Q Okay.  
 17 A And we compared the personnel rosters that we  
 18 received with the invoice package to rooms, et cetera.  
 19 Q Okay. When you say "rooms," just the number  
 20 of rooms?  
 21 A Yes, sir.  
 22 Q Okay.  
 23 A Several times, like, the company would have a  
 24 general foreman and he would -- every room had his name  
 25 on it --

1 Q So would it have been unusual for a vendor to,  
 2 say, stop in Columbus, Georgia for two days?  
 3 A I don't think it would have been unusual if  
 4 they made it that far and the storm was still in  
 5 Florida. They would have held up to be safe.  
 6 Q Did you ever negotiate how close they should  
 7 come, like, should you stop in [REDACTED] or  
 8 should you try to get down closer?  
 9 A No, sir.  
 10 Q So who made the decision about whether --  
 11 where they would lodge? Was that entirely on their end?  
 12 A Yes, sir.  
 13 Q TECO didn't do anything about arranging a  
 14 block of rooms in Savannah or anything like that?  
 15 A No, sir.  
 16 Q So all of the decisions about the pace of  
 17 getting to Florida and the route and the hotels were  
 18 with the vendor?  
 19 A Yes, sir.  
 20 Q Do you recall, after reviewing invoices,  
 21 pushing back on whether they were unreasonable in the  
 22 amount of time and the amount of money they spent  
 23 mobilizing?  
 24 A No, sir. Everything looked pretty straight to  
 25 myself and the other two people that reviewed.

1 Q Right.  
 2 A -- because he was the one that had the credit  
 3 card or whatever, so --  
 4 Q If, for example, you had -- and this is a  
 5 hypothetical -- 24 rooms, and you could see on the hotel  
 6 document that it was one person per room, and you only  
 7 got eight people, would you --  
 8 A We would have challenged that.  
 9 Q That would be a red flag?  
 10 A Yes.  
 11 Q Was it your group or was it someone else in  
 12 the company that reconciled the timesheets submitted  
 13 with the rosters that you maintained?  
 14 A My group.  
 15 Q Okay.  
 16 MR. MOYLE: I'm sorry. What was that answer?  
 17 THE WITNESS: "My group."  
 18 MR. MOYLE: "My group"?  
 19 THE WITNESS: Yeah, as far as the foreign crew  
 20 coordinators.  
 21 MR. MOYLE: And reconciling that, your group  
 22 did that?  
 23 THE WITNESS: Yes, sir.  
 24 MR. MOYLE: Okay. Thank you, Charles. I just  
 25 couldn't hear.

1 MR. REHWINKEL: Understood.  
2 THE WITNESS: I speak softly sometimes, so you  
3 have to remind me I need to speak up.

4 BY MR. REHWINKEL:  
5 Q So in receiving invoices, did you have a  
6 process in place that -- where you -- and let's assume  
7 that it was a utility that you knew was not on your  
8 nickel as far as demobilizing, they were going somewhere  
9 else. Did you have a process where you checked and  
10 verified that the time that was recorded on the  
11 timesheets that supported the invoices they wanted you  
12 to pay was not after the release date that we talked  
13 about in Exhibit 3?

14 A Yes, sir. Yeah, they were -- they were  
15 checked. And also, on Exhibit 1, it had dates with  
16 hours for the different utilities or contractors.

17 Q So let me give you this hypothetical. Let's  
18 assume that a crew, their release date was the 17th and  
19 they were released after working four hours, so maybe  
20 sometime around 10:00 a.m. Would you expect to have any  
21 costs to be paying anything for that crew after  
22 September 17th at noon?

23 A No, sir. If they were released to another  
24 utility, no.

25 Q And I was assuming that -- the assumption in

1 A At least not to my face or not to my ear.  
2 Q Now, was there anything -- well, strike that.  
3 Some vendors charge fuel and it seemed like  
4 most did on the way down. Would that be fair?

5 A Yes, sir.

6 Q And in doing so, what were your requirements  
7 as far as proof of payment for you to pay for their  
8 fuel?

9 A Receipts.

10 Q Did your team prepare cost summaries of each  
11 vendor, in other words, by type of cost, labor, fuel,  
12 meals, hotel?

13 A Not broken down like that.

14 Q Was there some kind of summary that you  
15 prepared for each vendor?

16 A We did a reconciliation sheet that would have  
17 had the labor, vehicle cost, and most of the time if  
18 there were incidental expenses, those costs would have  
19 been on the reconciliation.

20 Q So what was being reconciled, how much they  
21 billed versus how much you agreed to pay?

22 A Correct.

23 Q Is that a document that we've received?

24 A Yes, sir, that should be.

25 Q It's in there?

1 that was that you don't have an obligation for their  
2 demobilization.

3 A Correct.

4 Q Were there any exceptions to the understanding  
5 that if a crew worked for another utility after TECO  
6 released them, that you were no longer responsible for  
7 any cost? Are there any exceptions to that that you're  
8 aware of?

9 A No, sir. I recall seeing some invoices that  
10 had dates for hotels after that, but we went back  
11 through those invoices and they were included in our  
12 package, but not charged to us.

13 Q Okay. So you verified that they were not --  
14 that those costs didn't total up to --

15 A The bottom line.

16 Q Okay. With respect to the vehicles, I think  
17 we had the one example where -- well, I think you  
18 mentioned, I don't think you gave an example, but you  
19 mentioned that if you saw there were vehicle resources  
20 that were coming that you asked that you didn't need,  
21 you asked them to not bring them or to minimize that.  
22 And you're saying that happened in Irma?

23 A Yes, sir. To my knowledge, everybody played  
24 pretty well on that.

25 Q So were there any that refused to honor that?

1 A Yes.

2 MR. REHWINKEL: Can we take a few minutes and  
3 just find that document?

4 MR. WAHLEN: Sure. Go off the record?

5 MR. REHWINKEL: Yes, off the record.

6 (Recess from 11:12 a.m. to 11:22 a.m.)

7 BY MR. REHWINKEL:

8 Q All right. So just looking through these  
9 documents that you provided, which are the  
10 reconciliation documents that you referenced before, it  
11 looks like there are documentation in here where you go  
12 through and you see what they invoiced and you check it,  
13 and in some cases there is a difference of zero,  
14 sometimes you deduct, and I guess in a few cases there  
15 were things that were added. Is that fair?

16 A Yes, sir.

17 Q Okay. And we don't have time to go through  
18 all this, but that's, essentially, what this  
19 documentation is. And this would be, essentially, the  
20 final reconciliation between what was invoiced and what  
21 you paid --

22 A Yes, sir.

23 Q -- based on the review that you did?

24 A Yes, sir.

25 Q Okay.

1 MR. WAHLEN: And just for the record, are you  
 2 going to -- are you going to mark those as exhibits  
 3 or not?  
 4 MR. REHWINKEL: I don't think I am.  
 5 MR. WAHLEN: But that's our response to the  
 6 production of documents that were due today.  
 7 MR. REHWINKEL: Yes.  
 8 MR. WAHLEN: Okay.  
 9 MR. REHWINKEL: This is the confidential --  
 10 MR. WAHLEN: Okay.  
 11 MR. REHWINKEL: -- documentation. It's  
 12 numbered page 1 through 306.  
 13 MR. WAHLEN: Okay. I just want to make sure  
 14 we knew what this is. That's great. Thank you.  
 15 BY MR. REHWINKEL:  
 16 Q When requiring verification for fuel invoices,  
 17 did it matter to you whether the receipt was on a  
 18 company credit card or a company fuel fleet card or a  
 19 worker's personal card?  
 20 A No, sir.  
 21 Q What about cash?  
 22 A It should be a receipt for the cash. I mean,  
 23 it should indicate that. I don't recall any cash  
 24 receipts, but there probably were some.  
 25 Q And would you apply any different standard for

1 or supporting documentation based on a belief that it  
 2 was fraudulent?  
 3 A Not fraud. I don't believe we saw any that  
 4 were fraud in Irma for items that we didn't feel that we  
 5 should pay for. We challenged those. But I don't  
 6 recall any that were straight-out fraud --  
 7 Q Okay.  
 8 A -- or we believed were straight-out fraud.  
 9 Q So you're saying you didn't challenge any on  
 10 the basis that you thought it was fraudulent; is that  
 11 right?  
 12 A Yes, sir.  
 13 Q Were there any that you suspected might be  
 14 fraudulent?  
 15 A No, sir.  
 16 Q So if I asked you this question, "did you keep  
 17 records of dollars by vendor and invoice that your  
 18 review rejected for submission for final approval and  
 19 payment," you would say that's these documents?  
 20 A Yes, sir.  
 21 Q These 1 through --  
 22 A The reconciliation documents.  
 23 Q Okay.  
 24 MR. WRIGHT: Excuse me. I missed the word,  
 25 something-something documents.

1 evaluating payment of a vendor invoice than you would  
 2 for, say, a TECO employee's invoice for their travel?  
 3 A No, sir.  
 4 Q Do you happen to know, based on just your  
 5 experience as a TECO employee and your work, whether  
 6 when you travel for the company, do you have a -- do you  
 7 use a personal credit card for fuel or is there a  
 8 company credit card?  
 9 A I've used both. And I have what's called a  
 10 purchase card now from the company, but in past years  
 11 I've used my own personal credit card and then created  
 12 an expense voucher for that.  
 13 Q Okay. When evaluating a receipt for approval,  
 14 are there any standards or requirements with respect to  
 15 whether the receipt is an original or a copy or a  
 16 duplicate?  
 17 A No, sir. I mean, most of the time we're going  
 18 to receive duplicates because -- and the expectation  
 19 there is that the company or the utility is going to  
 20 maintain the original in their files and system. But  
 21 the duplicate is -- I mean, it's a scanned document. We  
 22 usually receive pdf's which carries a document  
 23 properties archive of the exchanges that's created or  
 24 whatever.  
 25 Q Okay. Did you reject for payment any invoice

1 THE WITNESS: The reconciliation documents.  
 2 MR. WRIGHT: That's -- I just didn't get it.  
 3 Thank you.  
 4 THE WITNESS: I'm sorry.  
 5 MR. MOYLE: Is there a Bates stamp number or  
 6 some way to identify that document?  
 7 MS. PONDER: The response to OPC 14.  
 8 MR. REHWINKEL: Yeah, it's the -- well, I'll  
 9 tell you what. Let's just do this. Just, we'll  
 10 make this an exhibit.  
 11 Well, Jeff made a face that asked me to  
 12 reconsider that. I'm just trying to get a way  
 13 to --  
 14 MR. WRIGHT: Can we go off the record?  
 15 MR. REHWINKEL: Yes, let's go off the record  
 16 for a second.  
 17 (Discussion off the record.)  
 18 (Mr. Moyle left the deposition at this time.)  
 19 (Lunch recess from 11:40 a.m. to 12:32 p.m.)  
 20 MR. REHWINKEL: We'll go back on the record.  
 21 Jeff, did you want to address the 306 pages?  
 22 MR. WAHLEN: Yes. During our lunch break, we  
 23 talked to the people who prepared the documents and  
 24 I think we've figured out what happened or what is  
 25 going on.

1 Today the company responded to Office of  
2 Public Counsel's Request for Production of document  
3 14C. And in its written response, it said that  
4 documents that are Bates stamped numbered 22  
5 through 86 or so are on a confidential CD.

6 If you look on the CD, there are a number of  
7 files and they have been numbered, but each of the  
8 file has been given an individual number. The 306  
9 pages that we were talking about that had been  
10 produced physically to the Office of Public Counsel  
11 are a printout of the files that are on the  
12 confidential CD. And because some of the files --  
13 many of the files printed out with more than one  
14 page, that's the difference between the 60 or so  
15 pages that were suggested in the written response  
16 and the 306 pages that are the physical documents  
17 when you print them out.

18 So we have, Charles, this morning filed the  
19 response in a motion for temporary protective order  
20 which would allow you to take possession of either  
21 the physical documents or the CD. The CD will be  
22 for you when you get back.

23 MR. REHWINKEL: Okay.

24 MR. WAHLEN: But that's what we're dealing  
25 with. And I think we've talked about on the break,

1 Q Would you use the document itself in order to  
2 evaluate whether to pay the invoices?

3 A Well, at different times when I had questions  
4 on invoices, I would contact Lee Collins and he would,  
5 you know, give me guidance according to the Mutual  
6 Assistance Agreement and send me those pages.

7 Q Yeah, okay.

8 MR. REHWINKEL: Jeff, I'm going to make a  
9 late-filed deposition exhibit request and we can  
10 address it as you -- we can discuss how to address  
11 it, but I would like to ask for the current Mutual  
12 Assistance Agreement.

13 MR. WAHLEN: Would that be Exhibit 4?

14 MR. REHWINKEL: 4, yes.

15 MR. WAHLEN: Okay. We can do that.

16 MR. REHWINKEL: All right.

17 MS. YOUNG: Do you want the agreement --

18 MR. REHWINKEL: Yes.

19 MS. YOUNG: -- or the guidelines?

20 MR. WAHLEN: The whole agreement.

21 MR. REHWINKEL: The whole agreement.

22 Let's go off the record for a second.

23 (Discussion off the record.)

24 MR. REHWINKEL: So we'll call that Late-Filed  
25 Deposition Exhibit Number 4. Did you get that?

1 rather than identifying these 306 pages as a  
2 deposition exhibit, if there are portions of the  
3 document that are useful to answering questions, we  
4 would use those pages and identify those and call  
5 them up.

6 MR. REHWINKEL: Yes. So in the room there and  
7 anybody that's following along, if I ask a question  
8 that can be answered by reference to a  
9 reconciliation document in the 306 pages, we'll try  
10 to pull it up on the screen and see if it adds  
11 anything to the answer, and then we would try to  
12 pull out of this stack that document and make it a  
13 deposition exhibit, if it's helpful.

14 Okay. Are we ready to go back? Are you  
15 ready?

16 THE WITNESS: Yes, sir.

17 BY MR. REHWINKEL:

18 Q All right. Is there a document that is the  
19 Mutual Assistance Agreement?

20 A There is. I think for our company,  
21 Lee Collins is the keeper of that document.

22 Q What's the size of the document? Have you  
23 ever seen it?

24 A I've seen excerpts from it, but I don't recall  
25 ever seeing the total document.

1 MS. PONDER: Yes. The Mutual Assistance  
2 Agreement?

3 MR. REHWINKEL: Yes.

4 MS. PONDER: Okay. Got it.

5 (Exhibit 4 to be marked and produced as a  
6 late-filed exhibit.)

7 BY MR. REHWINKEL:

8 Q And do you know whether that any of the  
9 documentation in the MUA, whether it's the agreement or  
10 the guidelines or procedures, has any rates in it, labor  
11 rates?

12 A No idea, sir.

13 Q Okay. We had a brief discussion about meals  
14 and some of the utilities billing you for meals and it  
15 was a bit of a surprise to you, but you only learned  
16 about their policy on how to bill meals after you got  
17 the invoice. Do you recall that?

18 A Yes, sir.

19 Q Were there any such surprises with respect to  
20 the labor rates that you were charged or you were  
21 invoiced for?

22 A I don't think so. I don't recall any.

23 Q Okay. Were all of the labor rates within the  
24 expectation that you had? I mean, did every company  
25 tell you up-front what their labor rates are going to



1 be?  
 2 A Yes, sir.  
 3 Q And the same with vehicles?  
 4 A Yes, sir.  
 5 Q Okay. Did you -- do you know whether -- well,  
 6 you would know whether you did. But with respect to the  
 7 crews you engaged, did you turn down any crews based on  
 8 the cost that would be involved in getting them there  
 9 versus the amount of time and work they could give you?  
 10 A We only turned away one crew and it's  
 11 basically because they wouldn't arrive until, at best,  
 12 the last day of restoration.  
 13 Q Okay. Did you know when you talked to the --  
 14 do you have an idea of how long restoration would be?  
 15 A We -- again, you know, we have those  
 16 conference calls at least twice a day.  
 17 Q Right.  
 18 A And I knew what the projection for restoration  
 19 was according to our damage assessment teams.  
 20 Q So is this a crew that you turned down after  
 21 the storm hit?  
 22 A Yes, sir.  
 23 Q Okay. Is this the [REDACTED]  
 24 A Yes, sir.  
 25 Q Now, did you pay the bill for [REDACTED] for

1 inconsistent with what you would expect to pay under the  
 2 SEE MUA?  
 3 A I'm sure there were instances, you know,  
 4 because we had coolers, sheets, pillows invoiced, and,  
 5 you know, we had to make decisions or challenges to  
 6 those as long as -- also, the vehicle repairs. And so I  
 7 think the answer is yes. And if we felt they were  
 8 unreasonable, I'm pretty sure that those were  
 9 challenged, or at least taken to Beth Young or  
 10 Thad Lopez or Lee Collins for clarification and guidance  
 11 on.  
 12 Q Okay. I think you said earlier when we were  
 13 early in the deposition that the vendors that you were  
 14 kind of put in a position of using for Irma were not  
 15 your usual vendors. Did I misunderstand what you said?  
 16 A No. I mean, most of the vendors that we used  
 17 for Irma had never been on our system before. We had no  
 18 real knowledge of them prior to Irma.  
 19 Q But there were some vendors that were in  
 20 common to Irma and, say, Erika -- was Erika the last  
 21 storm that you had foreign crews?  
 22 A I'm not sure. I think it might have been  
 23 Hermine. Hermine would have been the last storm.  
 24 Q So were there some in common?  
 25 A I think maybe one, maybe two. But even

1 the time that they were mobilizing?  
 2 A Yes, sir.  
 3 Q Did any of the vendors or contractors that  
 4 comprised the foreign crews that you were involved with,  
 5 did they provide their agreement to follow the SEE  
 6 guidelines? Did they provide that in writing?  
 7 A No, sir.  
 8 Q So nobody did that?  
 9 A No, sir.  
 10 Q Were there any instances where a vendor or  
 11 contractor did not follow the SEE guidelines that they  
 12 had at least orally or implicitly agreed to?  
 13 A Well, it really is the utilities that would  
 14 have agreed to it, but the contractors never actually  
 15 agreed to that or complied with it or anything else. I  
 16 mean, that's basically an ad hoc situation.  
 17 Q Okay. Were there any circumstances where a  
 18 vendor that wasn't an IOU, a foreign crew vendor that  
 19 wasn't an IOU, invoiced you for services or expenses in  
 20 a way that you thought was unreasonable in the context  
 21 of the SEE MUA?  
 22 A I'm sure -- I don't understand what you're  
 23 asking.  
 24 Q Okay. Was there any non-IOU vendor that  
 25 invoiced you for something that you thought was

1 Hermine was such a small storm compared to Irma that  
 2 there weren't that many foreign crews.  
 3 Q All right. Did you in your role within the  
 4 scope of your duties in Irma, did you approve or submit  
 5 for final approval and payment any invoice or portion of  
 6 invoice that would have been rejected were it not for  
 7 the conditions of storm restoration?  
 8 A Could you rephrase that?  
 9 Q Yes. What I'm trying to get at is, did you  
 10 relax your standards for payment of any invoice based on  
 11 the fact that it was for storm restoration and not, say,  
 12 an ordinary day-to-day business?  
 13 A Yes, sir. I mean, if it had been normal  
 14 day-to-day business, we would have vetted each  
 15 contractor. We would have had contracts and purchasing  
 16 involved. They would have done due diligence. They  
 17 would have negotiated rates, logistics, et cetera,  
 18 instead of it being, basically, done on the fly.  
 19 Q When it came to reviewing and paying an  
 20 invoice, did you approve for payment any invoice that  
 21 you would not have done so had it been for a TECO  
 22 employee or a regular TECO vendor?  
 23 A Yes, sir. We would have -- I'm sure we did.  
 24 We would have challenged them on some of the expenses  
 25 more stringently than we probably did during the storm

1 restoration and after.  
 2 Q Okay. What I want to do now is go to the pile  
 3 and I want to talk about [REDACTED].  
 4 A Okay.  
 5 Q And I'm going to ask page 18. Let me just --  
 6 actually, I want to talk to you about pages 18 through  
 7 24, which I think is a -- 19 through 24, I apologize, a  
 8 [REDACTED] -- it looks like a [REDACTED] -- it should look like this.  
 9 MR. WAHLEN: What --  
 10 MR. REHWINKEL: Oh, this is the big --  
 11 THE WITNESS: 76.  
 12 MS. PONDER: So the 5,500 pages?  
 13 MR. REHWINKEL: This is the 5,500 pages.  
 14 MR. WAHLEN: Charles is about to ask questions  
 15 about the company's answer to OPC's Fifth Set of  
 16 Interrogatories Number 76, which is numbered  
 17 pages 19 through 24.  
 18 And Carlos is going to try and -- it looks  
 19 like he's getting close.  
 20 MR. ALDAZABAL: The file is open. What page  
 21 is it?  
 22 MR. REHWINKEL: 19.  
 23 MR. WAHLEN: 19 through 26.  
 24 BY MR. REHWINKEL:  
 25 Q I don't know if this is [REDACTED].

1 Q All right. And then in Columbus, they're in  
 2 Columbus, it looks like, if you go from the 21st to the  
 3 22nd, the fourth line down on the 22nd, it looks like  
 4 the last purchase of fuel in Columbus is early in the  
 5 morning on the 12th. Do you see that?  
 6 A Yes, sir.  
 7 Q Would you assume from this that given that on  
 8 page 21, the first purchase of fuel is at 8:45 p.m. on  
 9 the 10th, that they spent the night of the 10th and the  
 10 11th in Columbus, Georgia?  
 11 A Yes, sir.  
 12 Q Okay. And would the decision about whether to  
 13 spend two nights in Columbus, Georgia be entirely [REDACTED]  
 14 [REDACTED]  
 15 A Yes, sir.  
 16 Q Okay. Is there any reason -- and so when [REDACTED]  
 17 [REDACTED] crews are in Columbus, Georgia, do you know what  
 18 rate they were charging and whether it was overtime,  
 19 double time or regular time? It would be reflected in  
 20 their timesheets; is that fair?  
 21 A Yes.  
 22 Q So when a crew is -- what was the term you  
 23 used, where they're kind of stationary? Do you-all have  
 24 a term for it?  
 25 MR. WRIGHT: Dry dock was a term you used

1 Are you familiar with them? This looks like fuel  
 2 receipts for [REDACTED].  
 3 A Okay.  
 4 Q All right. Would you know whether you had  
 5 disallowed any expenses for this company?  
 6 A I don't recall disallowing any expenses for [REDACTED].  
 7 [REDACTED].  
 8 Q Okay. Do you know when [REDACTED] was engaged and  
 9 when they arrived in Florida?  
 10 A [REDACTED] would have started travel on  
 11 September 9th.  
 12 Q Where were they coming from, somewhere in  
 13 [REDACTED]?  
 14 A Yes, sir.  
 15 Q And when did they arrive?  
 16 A It looks like they actually arrived on the  
 17 12th of September.  
 18 Q So would they have started working on the  
 19 13th, then?  
 20 A Yes, sir.  
 21 Q Okay. If you look on page 21, it appears that  
 22 [REDACTED] crew purchased gas from Dalton, Georgia down to  
 23 Columbus, Georgia on -- throughout the day on the 10th.  
 24 Do you see that on the left-hand side?  
 25 A Yes, sir.

1 earlier.  
 2 MR. REHWINKEL: Dry dock?  
 3 MR. WRIGHT: Dry docking.  
 4 BY MR. REHWINKEL:  
 5 Q Okay. So you call that dry docking where  
 6 they're in Columbus for two nights?  
 7 A Yes, sir.  
 8 Q Okay. While they're dry docking, should they  
 9 be driving around, say, like a truck -- should a truck  
 10 have 119 miles on it?  
 11 A I wouldn't think so, but --  
 12 Q All right. Well, should they be buying a lot  
 13 of fuel over two days while they're dry docking?  
 14 A They shouldn't be.  
 15 Q Okay. So what are your expectations about  
 16 whether they go out to eat, go to -- they go to Outback  
 17 or go to Bonefish or something like that where they  
 18 maybe spend \$30 and \$40 a person on a meal buying steak  
 19 and shrimp? Should they be doing that while they're dry  
 20 docked?  
 21 A It's their company's.  
 22 Q But who pays for those costs?  
 23 A I'm sure they're passed on to us.  
 24 Q Are there any guidelines that TECO provides  
 25 when it comes to what people should pay while they're

1 mobilizing as far as meals? Is there an upper limit on  
2 what you're willing to pay?

3 A I don't recall. I think it's a reasonable  
4 expectation.

5 Q All right.

6 A We don't -- I don't think we expect people to  
7 eat peanut butter and jelly sandwiches.

8 Q Okay. So can you turn to page 3 of -- and all  
9 the page numbers I'm going to give now are going to be  
10 based on the 5,573 pages plus the supplementals that  
11 have the numbers.

12 MR. WAHLEN: Carlos, can you find that?

13 MR. ALDAZABAL: I'm sorry. What page?

14 MR. WAHLEN: Page 3.

15 MR. REHWINKEL: Page 3.

16 BY MR. REHWINKEL:

17 Q Now, if you could just turn to page 4 real  
18 quick, and keep your thumb on 3?

19 MR. WAHLEN: That's page 4 and there's page 3.

20 BY MR. REHWINKEL:

21 Q So page 4, it shows your -- is this one of  
22 those where you signed the timesheet somewhat  
23 contemporaneous with the submission?

24 A Right.

25 Q Now, I know you wouldn't sign a timesheet --

1 Q Is that standard to have a higher rate for a  
2 mobilization than your regular labor rate, or your  
3 overtime rate even?

4 A It's company to company.

5 Q Okay.

6 A There's no standard for that.

7 Q So when this company starts, they get the call  
8 and they start clocking time, so to speak, they charge  
9 [redacted] until they get to the Tampa service territory?

10 A It could be that, or it looks like the first  
11 [redacted]  
12 [redacted].

13 Q Okay. So where do you see on here that they  
14 had straight time?

15 A Column -- it's the seventh from the right, ST  
16 hours.

17 Q Okay. Well, let's go back to -- it looks like  
18 their first day of time is the 9th; is that right?

19 A Part of them, yes.

20 Q So they have -- well, this guy has zero hours,  
21 but there's people below him that have eight and a half;  
22 is that right?

23 A Yes, sir.

24 Q And it says Mob/Demob. So does that mean that  
25 this is at the [redacted] rate?

1 Well, first of all, did you sign timesheets  
2 for the time that the company was mobilizing when they  
3 were on their way down?

4 A Yes, sir.

5 Q Okay.

6 A Sometimes. Yeah, this was one of them.

7 Q All right. And TECO, when companies are  
8 mobilizing, you don't have anyone in the field, so to  
9 speak, that can verify their time?

10 A No, sir.

11 Q But there is a process in place to verify  
12 rosters and check in at the mobilization -- not  
13 mobilization, but at the incident bases?

14 A Yes, sir.

15 Q But this is a case where you would be giving  
16 approval for them on their timesheets, right?

17 A Yes, sir.

18 Q Okay. So going back to page 3, it looks like  
19 over on the right-hand side, and let's just take  
20 [redacted], he's the top guy on the line. I don't know  
21 if he's the top guy on the crew. He's just -- he's on  
22 the first line there. I see a straight time rate of  
23 [redacted], a mobilization/demobilization rate of [redacted], and  
24 then an overtime rate of [redacted]; is that right?

25 A Yes, sir.

1 A I would have to do the math and figure it out,  
2 but yes, sir, that would be at [redacted] an hour.

3 Q Okay. So then on the 10th it looks like  
4 they're charging mobilization/demobilization time.

5 A Correct.

6 Q Now, on the 11th what are they charging?

7 A Eight hours. [redacted] charged eight hours  
8 straight time and six hours overtime.

9 Q And then on the 12th, eight hours straight  
10 time and ten and a half hour of --

11 A Overtime.

12 Q -- overtime? Okay.

13 So would you have an idea why the 10th would  
14 be mobilization/demobilization and the 11th when they  
15 were clearly traveling based on the gas records, why  
16 that wouldn't be mobilization/demobilization?

17 A No, sir.

18 MR. REHWINKEL: Okay. I want to make page 3  
19 Exhibit 5. And this will be [redacted] Labor and  
20 Equipment Summary. Is that a good explanation of  
21 this?

22 THE WITNESS: Yes, sir.

23 MR. REHWINKEL: Okay. Exhibit 5.  
24 (Exhibit 5 was marked for identification.)

25 MR. REHWINKEL: And then for late-filed

1 Exhibit 6, I want to do pages 19 through 24.  
 2 MR. WAHLEN: That's just deposition exhibit,  
 3 not --  
 4 MR. REHWINKEL: Yes, deposition exhibit, 19  
 5 through 24, and we'll call it [REDACTED] Fuel Summary.  
 6 And we're calling this 6.  
 7 (Exhibit 6 was marked for identification.)  
 8 BY MR. REHWINKEL:  
 9 Q On Exhibit 6, let's look at -- on page 21  
 10 you'll see the far left-hand column is -- it says  
 11 vehicle number.  
 12 MR. WRIGHT: Excuse me. Carlos, could you  
 13 please enlarge that maybe 20 percent? I think  
 14 everything should show. You can try 125 and see  
 15 what happens. No. So I think maybe a little  
 16 smaller, maybe 115. You can just type in 115 and  
 17 see what that does for us. Thank you.  
 18 BY MR. REHWINKEL:  
 19 Q Okay. So on page 21, you see the page  
 20 numbered 21. You see just to the 1 and the 21, you see  
 21 just to the right of that, you see vehicle 5141?  
 22 A Yes, sir.  
 23 Q All right. And so this vehicle puts [REDACTED] of  
 24 gas in the tank at 9:45 a.m. on the 11th. Do you see  
 25 that?

1 accounts or documents any receipts supporting these fuel  
 2 summaries. Do you know whether you had them or not?  
 3 A I would think we do have them.  
 4 Q Do you know whether they were provided to us?  
 5 A They may have been provided today.  
 6 MS. YOUNG: Do you want the supplemental?  
 7 MR. REHWINKEL: Are they in the supplemental?  
 8 MS. YOUNG: I don't know. Is that the  
 9 supplemental?  
 10 THE WITNESS: Yes, ma'am.  
 11 BY MR. REHWINKEL:  
 12 Q I don't know that I want to go through 1,300  
 13 pages. Do you know whether -- do you have a belief that  
 14 you provided --  
 15 A Yes, sir.  
 16 Q -- for [REDACTED]  
 17 A Yes, sir, I do.  
 18 Q Okay.  
 19 A We would have required the receipts.  
 20 Q Okay. Well, then I don't want to go through  
 21 the receipts now because I haven't had a chance to look  
 22 at them, and so I don't have any specific questions  
 23 about it.  
 24 I want to now turn to -- we can put [REDACTED]  
 25 away, and I would like to turn to the [REDACTED] invoices. And

1 A Yes, sir.  
 2 Q And then if you go down to the  
 3 next-to-the-last line, vehicle 5141 at 6:36 p.m. on the  
 4 11th puts in [REDACTED] of fuel. Do you see that?  
 5 A Yes, sir.  
 6 Q Is there a reason why they should be fueling  
 7 up a truck while they're dry docked like that?  
 8 A They must have done some sightseeing.  
 9 Q Okay. Is that something that you expect them  
 10 to do while they're killing time waiting on the storm?  
 11 A Not necessarily, no.  
 12 Q I guess we could take a look at it, but it  
 13 looks like if you accept in the middle of this page, it  
 14 says Outside Payment Terminal. Do you see that?  
 15 A Yes, sir.  
 16 Q And just to the left of that, we see the  
 17 number of 2621, and the heading on page 19 shows Current  
 18 Odometer. And then that's in the 9:45 transaction,  
 19 2621. And then we get down here to the 6:36 p.m.  
 20 transaction, it's 2740, it looks like, about a --  
 21 A 120 miles?  
 22 Q Yes. Is that something that you would expect  
 23 the vendors to do while they're dry docked?  
 24 A No, sir.  
 25 Q Now, I did not see in my review of [REDACTED] s

1 the first one --  
 2 Well, first I want to ask, are AEP invoices  
 3 and receipts documents that you reviewed for -- in the  
 4 approval process?  
 5 A Well, I would have reviewed them before  
 6 forwarding them on.  
 7 Q Yes. But when I say "in the approval  
 8 process," I mean whatever your role was in that.  
 9 A Yes, sir.  
 10 Q Okay. Obviously, this is an invoice for close  
 11 to [REDACTED] You would not have been  
 12 able to approve that for payment, right?  
 13 A No, sir.  
 14 Q Okay.  
 15 MR. WAHLEN: Charles, do you want to give us  
 16 some numbers, page numbers?  
 17 MR. REHWINKEL: Yes, I'm about to do that.  
 18 BY MR. REHWINKEL:  
 19 Q You might -- you're leaning back and you're  
 20 soft, just so they can hear on the phone.  
 21 So the first page I want to ask you about is  
 22 going to be on page 150. No, it actually -- I take that  
 23 back. Page 516. You don't have to find it in there. I  
 24 can just show it to you here if you'd like.  
 25 A Sure.

1 Q Actually, page 514 through 516. This is the  
2 e-mail that's -- where you questioned some expenses. Do  
3 you know whether -- so this e-mail questions repair  
4 costs, the pillows and the cooler and the sheets that  
5 you referred to earlier, right?

6 A Right.

7 Q And do you know beyond this document whether  
8 any other expenses of [REDACTED] you challenged?

9 A This was if they had some receipts that were  
10 included that were for outside the date range and what  
11 we verified, that those weren't charged to us.

12 Q Okay. I'll probably ask you about those, just  
13 to make sure we know.

14 And I believe in pages 517 through 519 is the  
15 summary invoice, the final summary invoice from [REDACTED]; is  
16 that right?

17 A This looks like it, yes, sir.

18 Q I think in the supplemental filing, you gave  
19 us what was a preliminary one or there was some -- there  
20 was some adjustment on their part; is that correct?

21 A Yes, [REDACTED] or something like that.

22 Q Okay. Now, was that adjustment or [REDACTED] or  
23 so dollars, was that partly because of those receipts  
24 for the hotel?

25 A No, sir. That was just those charges.

1 A Right.

2 Q [REDACTED] That's the amount that's -- I  
3 think that's in your request, is that right, for  
4 customers to pay?

5 A I thought ours had some comment flags on it.  
6 Look at the other --

7 MR. ALDAZABAL: Blow this one up?

8 THE WITNESS: Um-hum. This is the one that --  
9 go to the breakdown and scroll. Scroll up. Scroll  
10 up.

11 MR. ALDAZABAL: That's it.

12 THE WITNESS: I was pretty sure I had included  
13 comment flags.

14 BY MR. REHWINKEL:

15 Q So were those [REDACTED], are those adjustments  
16 that they agreed to or that you made?

17 A That's what we were questioning.

18 Q That corresponds to the number on page 516; is  
19 that right?

20 A Yes, sir. That's what we were questioning.

21 Q Okay. But do you know what they ultimately  
22 took out?

23 A I don't recall.

24 Q Okay. All right. Now let's go look at  
25 page 150. I think I can just hand this to you. This

1 Q Okay. Well, on here it looks like they agreed  
2 to take off [REDACTED]. Did they take off  
3 the whole [REDACTED] you challenged?

4 A I may be not remembering it correctly, but --

5 MR. WAHLEN: Wes, can you speak up a little  
6 bit?

7 A I'm probably not remembering it correctly, but  
8 questionable invoices -- I would have to go to the  
9 reconciliation sheets to see exactly what was taken off.

10 BY MR. REHWINKEL:

11 Q Okay. Well, let's do that. Let's see if we  
12 can pull up the [REDACTED] reconciliation.

13 MR. ALDAZABAL: Oh, [REDACTED] reconciliation?

14 MR. REHWINKEL: Yes.

15 A There are several of them. You almost have to  
16 know --

17 BY MR. REHWINKEL:

18 Q I said 1.7. It is 3.9. I'm sorry. I said  
19 the wrong number there. You want to --

20 A Yeah, 3.9.

21 Q Let's see what --

22 A This isn't the one, I don't think.

23 MR. ALDAZABAL: Does it look familiar, Wes?

24 BY MR. REHWINKEL:

25 Q Okay. That's the final amount.

1 looks like a Walmart receipt in [REDACTED] on  
2 9/11. It looks like a little bit after midnight. Do  
3 you see that?

4 A Yes, sir.

5 Q Now, what is the understanding about --

6 MR. WRIGHT: Charles?

7 MR. REHWINKEL: Yes.

8 MR. WRIGHT: I'm sorry, but if you could slow  
9 down so it's on the screen to help the rest of us  
10 out.

11 MR. WAHLEN: I think we're on the wrong page.

12 MR. REHWINKEL: We're back on 176.

13 MS. YOUNG: Is it the supplement or it's the  
14 regular one?

15 MR. REHWINKEL: No, not the supplemental.

16 MS. PONDER: It's not?

17 MR. WAHLEN: No, it's the regular.

18 MR. REHWINKEL: Regular.

19 MS. YOUNG: Which page?

20 MR. REHWINKEL: 150. So scroll down a little  
21 bit.

22 BY MR. REHWINKEL:

23 Q So [REDACTED] 8 around midnight on the 11th in  
24 [REDACTED]; is that right?

25 A Yes, sir.

1 Q Okay. So what is the understanding about  
 2 paying for things like this when it comes to mutual  
 3 assistance?  
 4 A Well, it's incidental costs. I mean, they  
 5 were picking up snacks and for the travel.  
 6 Q Okay.  
 7 A That would be the expectation.  
 8 Q And do most all the vendors do that when they  
 9 start out?  
 10 A Yes, sir.  
 11 Q Okay.  
 12 A They stock up on whatever.  
 13 Q And that's not a cost that you consider to be  
 14 inappropriate?  
 15 A No, sir.  
 16 Q Okay. Let's look at page 151. Do you  
 17 recognize that receipt? And it looks like a charge at  
 18 Gecko's Grill & Pub of [REDACTED] on September 18th at  
 19 2:52 p.m. in Bradenton.  
 20 A It looks like that should have gone to either  
 21 Duke or FPL.  
 22 Q Okay. Bradenton is in FPL's territory, isn't  
 23 it?  
 24 A Yes, sir.  
 25 Q Would you have paid this?

1 A If we had -- if I had seen it, probably not.  
 2 Q Okay. So you would not have reviewed --  
 3 A Not the receipt level.  
 4 Q Okay.  
 5 A And, you know, if I was doing that invoice,  
 6 I'd be reviewing the receipts.  
 7 Q So you didn't do this invoice?  
 8 A I approved it, but a team member most likely  
 9 was responsible for reviewing it.  
 10 Q Okay. Do you know who was the team member?  
 11 A Not off the top of my head.  
 12 Q All right. Let's look at page 162. I'll show  
 13 you that invoice. Do you know whether this receipt was  
 14 paid and, if so, why?  
 15 A Well, it was during the travel to Tampa  
 16 Electric.  
 17 Q Okay. So this is [REDACTED] at an Outback  
 18 Steakhouse and --  
 19 A It looks like for five people.  
 20 Q I think it says a party of eight over there on  
 21 the left, does it not?  
 22 A On the left?  
 23 Q Right there under the word "Outback," the big  
 24 Outback?  
 25 A Okay. Yes.

1 Q All right. And does it say duplicate on  
 2 there?  
 3 A Duplicate copy.  
 4 Q Yeah. What does that mean?  
 5 A Usually you get a merchant copy and a customer  
 6 copy that can either be marked customer or duplicate.  
 7 Q Why would you get a duplicate copy?  
 8 A Because the merchant gets the merchant copy.  
 9 Q But isn't there something called a customer  
 10 copy?  
 11 A Some restaurants have customer copies, some  
 12 use duplicate.  
 13 Q Do you know what Outback's --  
 14 A I have no idea what their policy is.  
 15 Q Okay. All right. So page 186. This is the  
 16 receipt that you challenged for pillows and --  
 17 A Correct.  
 18 Q So somebody on your team brought that to your  
 19 attention?  
 20 A Yes, sir.  
 21 Q Okay. All right. Page 225.  
 22 MR. REHWINKEL: Before I go to 225, I want to  
 23 make page 151 a deposition exhibit. I apologize.  
 24 I should have done that in the first place.  
 25 So this will be Number 7, and it will be

1 Bradenton Meal Receipt.  
 2 (Exhibit 7 was marked for identification.)  
 3 BY MR. REHWINKEL:  
 4 Q Let's look at page 225. And this is going to  
 5 be a deposition exhibit too. This will be Number 8.  
 6 Let me hand this to you and ask you if that receipt was  
 7 paid and if it should have been.  
 8 A It probably was paid. It probably should not  
 9 have been paid by us.  
 10 Q Is that because it's a purchase in Sarasota  
 11 after release of the [REDACTED] group?  
 12 A Yes, sir.  
 13 Q All right. And whose name is associated with  
 14 this receipt?  
 15 A [REDACTED].  
 16 Q Okay. Just how it sounds, right?  
 17 A Right, [REDACTED].  
 18 MR. REHWINKEL: And this will be late-filed  
 19 Deposition Exhibit 8.  
 20 (Exhibit 8 was marked for identification.)  
 21 BY MR. REHWINKEL:  
 22 Q Now, let's go to page 226. And you may want  
 23 to keep out the e-mails challenging the [REDACTED] receipts.  
 24 But page 226 is a Michelin Tire receipt and it looks to  
 25 me like it's dated September 27th in Atlanta, Georgia,

1 and it's -- can you tell me what that's for?  
 2 A It looks like a Michelin Tire. It looks like  
 3 they had to replace a truck tire in Atlanta.  
 4 Q And the total is [REDACTED]  
 5 A Yes, sir.  
 6 Q Do you know whether that was paid?  
 7 A Yes, sir, it was.  
 8 Q Okay. Why was it paid?  
 9 A Probably because we didn't scrutinize the  
 10 date.  
 11 Q Okay. So it looks like a flat tire on the  
 12 27th, ten days after they were released, right?  
 13 A Right. They would have been released from [REDACTED]  
 14 at that point.  
 15 Q Right. But whoever paid demobilization should  
 16 have picked this up, right?  
 17 A Right. It should have been [REDACTED] probably.  
 18 MR. REHWINKEL: This will be Number 9, and it  
 19 will be Michelin Tire Receipt.  
 20 (Exhibit 9 was marked for identification.)  
 21 BY MR. REHWINKEL:  
 22 Q Let's go --  
 23 MR. WRIGHT: Charles, I'm sorry. Eight was  
 24 page 225; is that accurate?  
 25 MR. REHWINKEL: Yes.

1 Q Should it have been paid?  
 2 A No, sir.  
 3 MR. REHWINKEL: Okay. Thank you. So this  
 4 will be Number 10, and it will be Axle Bill.  
 5 (Exhibit 10 was marked for identification.)  
 6 BY MR. REHWINKEL:  
 7 Q All right. So page 228.  
 8 Oh, and before we leave Exhibit 10, can you  
 9 tell me whose name is written on that one?  
 10 A [REDACTED]  
 11 Q Okay. Now let's look at this. This is a  
 12 receipt for -- on 228 for --  
 13 MR. REHWINKEL: Can you scroll a little more?  
 14 I gave him my copy.  
 15 BY MR. REHWINKEL:  
 16 Q -- 3,000 --  
 17 MR. REHWINKEL: Can you go down a little more?  
 18 BY MR. REHWINKEL:  
 19 Q [REDACTED]  
 20 A Correct.  
 21 Q And do you know what the date on this one is?  
 22 A This is September 21st.  
 23 Q Okay. That was four days after release,  
 24 correct?  
 25 A Yes, sir.

1 MR. WRIGHT: Thank you.  
 2 MR. REHWINKEL: And 9 is Michelin Tire  
 3 receipt.  
 4 MR. WRIGHT: That's 226.  
 5 BY MR. REHWINKEL:  
 6 Q And whose name is associated with this, if you  
 7 can see a handwritten name on there?  
 8 A That's [REDACTED] also.  
 9 Q Okay. All right. Now I'm going to hand you  
 10 page 227 and ask you to take a look at this one.  
 11 MR. ALDAZABAL: What page?  
 12 MR. WAHLEN: 227.  
 13 MR. REHWINKEL: 227. It's the next page.  
 14 BY MR. REHWINKEL:  
 15 Q And this appears to be a bill --  
 16 A For the axle.  
 17 Q For a part -- for axle shaft. And what's the  
 18 date on this bill?  
 19 A September 22nd.  
 20 Q All right. And that was five days after [REDACTED]  
 21 was released, right?  
 22 A Yes, sir.  
 23 Q Okay. Would this have been a bill that should  
 24 have been -- was it paid?  
 25 A Yes, sir.

1 Q And was this paid?  
 2 A Yes, sir.  
 3 Q Should it have been paid?  
 4 A Not by Tampa Electric.  
 5 Q And whose name is on this one?  
 6 A [REDACTED]  
 7 Q Okay. So this will be 11, and it will be --  
 8 do you know what that is for? Is it the gears?  
 9 A The gears of an axle.  
 10 MR. REHWINKEL: Okay. Axle Gear Repair.  
 11 We'll call that Axle Gear Repair.  
 12 (Exhibit 11 was marked for identification.)  
 13 BY MR. REHWINKEL:  
 14 Q And [REDACTED] name is on that one too?  
 15 A Yes, sir.  
 16 Q All right. Now let's look at page 229. Let  
 17 me hand you that one. And can you tell me the date on  
 18 this receipt?  
 19 A September 21st.  
 20 Q And this is [REDACTED] s name on this?  
 21 A Yes, sir.  
 22 Q And it's costs related to an axle shaft and a  
 23 gasket?  
 24 A Yes, sir.  
 25 Q [REDACTED]

1 A Yes, sir.  
 2 Q Was paid, but should not have been?  
 3 A Not by Tampa Electric.  
 4 Q Right.  
 5 MR. WAHLEN: Charles, are you marking any of  
 6 these more as exhibits or are you just talking  
 7 about them?  
 8 MR. REHWINKEL: I'm making exhibits.  
 9 MR. WAHLEN: So what's the number to that?  
 10 MR. REHWINKEL: This will be 12, I believe.  
 11 Is that right?  
 12 COURT REPORTER: Yes.  
 13 MR. REHWINKEL: That's right. And it will be  
 14 Axle Shaft/Gasket.  
 15 (Exhibit 12 was marked for identification.)  
 16 BY MR. REHWINKEL:  
 17 Q Let's go to page 230, and I want to ask you  
 18 about this receipt. Can you tell me what this is for  
 19 and when this cost was incurred?  
 20 A This looks like a fuel pump replacement and it  
 21 was created on September 21st.  
 22 Q Okay. And then you read -- you see where it  
 23 says in the comments about in the middle of the page,  
 24 "Customer providing own fuel pump and relay as we could  
 25 not get parts until 9/23/2017 and this is [REDACTED]"

1 Q Yeah.  
 2 A -- until it was repaired.  
 3 Q But given [REDACTED] track record, what  
 4 would you expect?  
 5 A I would expect that it broke down here in  
 6 Tampa on their return trip.  
 7 Q But after release?  
 8 A Yes, sir.  
 9 MR. REHWINKEL: Okay. So I forget the number  
 10 we're on.  
 11 MR. WAHLEN: Fourteen.  
 12 MR. REHWINKEL: Fourteen, and this will be  
 13 Relay/Module.  
 14 (Exhibit 14 was marked for identification.)  
 15 BY MR. REHWINKEL:  
 16 Q And has [REDACTED] name on it?  
 17 A Yes, sir.  
 18 Q All right. Page 232, I'm going to give you  
 19 another receipt and ask you if you know what that is  
 20 for. It's for [REDACTED] it looks like. Tell me the date on  
 21 it for one thing.  
 22 A The date, it looks like it could be  
 23 September 27th.  
 24 Q Okay. I mean, it's 27th or 21st, but it's  
 25 still after the 17th, right?

1 and needed vehicle ASAP"?  
 2 A Right.  
 3 Q This is [REDACTED] Has [REDACTED]'s name on  
 4 it?  
 5 A Yes, sir.  
 6 Q Was paid, but shouldn't have been?  
 7 A Yes, sir.  
 8 MR. REHWINKEL: All right. So this will be  
 9 Number 13, and it will be Fuel Pump.  
 10 (Exhibit 13 was marked for identification.)  
 11 BY MR. REHWINKEL:  
 12 Q All right. Page 231. Tell me the date on  
 13 this one.  
 14 A September 21st.  
 15 Q And it looks like for something called a relay  
 16 and some kind of module?  
 17 A Yes, sir.  
 18 Q And the total is [REDACTED] and -- I can't read the  
 19 bottom of that -- [REDACTED]  
 20 A Yes, sir.  
 21 Q Paid, shouldn't have been?  
 22 A This one would have been questionable because  
 23 the cost was here in Tampa. So was the -- did the truck  
 24 break down in Tampa as they were leaving or did they  
 25 leave it here broken --

1 A Yes, sir.  
 2 Q Do you even know what this is for?  
 3 A It looks like it's for towing services.  
 4 Q Okay. And you don't know what it towed or  
 5 from where to where?  
 6 A No, sir.  
 7 Q Okay. And it's got [REDACTED]'s name on it?  
 8 A Yes, sir.  
 9 Q All right. Was paid, probably shouldn't have  
 10 been?  
 11 A Yes, sir.  
 12 MR. REHWINKEL: Okay. So this will be 15, and  
 13 it will be Tow Bill.  
 14 (Exhibit 15 was marked for identification.)  
 15 BY MR. REHWINKEL:  
 16 Q Page 223 --  
 17 MR. WAHLEN: 223 or 233?  
 18 MR. REHWINKEL: 233. I apologize.  
 19 BY MR. REHWINKEL:  
 20 Q This one is a credit, it looks like, for a  
 21 core -- so just to make sure we have our math right, if  
 22 you improperly paid the total bill and then there was a  
 23 credit, to the extent that was inappropriate, the net  
 24 amount is what should be taken off the bill; is that  
 25 right?



1 A Yes, sir.  
 2 Q And what was that credit for, [REDACTED]  
 3 A Yes, sir.  
 4 MR. REHWINKEL: Okay. I'm not going to make  
 5 this an exhibit, but I can for completeness if you  
 6 want.  
 7 MR. WAHLEN: Sure.  
 8 MR. REHWINKEL: Okay. We'll call it 16, and  
 9 it will be Credit.  
 10 (Exhibit 16 was marked for identification.)  
 11 BY MR. REHWINKEL:  
 12 Q 234 -- we're almost done with the [REDACTED]  
 13 ordeal here. Page 234, let me ask you if you can tell  
 14 me, first of all, what the date on this invoice is for?  
 15 MR. WRIGHT: Charles, you said 234. Did you  
 16 mean 233?  
 17 MS. PONDER: I think they're a page off,  
 18 right?  
 19 MR. WRIGHT: I got it. Thank you.  
 20 BY MR. REHWINKEL:  
 21 Q It looks like September 21st.  
 22 A That's the invoice date, but the request date,  
 23 which would have been the creation date, was September  
 24 16th.  
 25 Q Okay. And it's got [REDACTED]'s name on it

1 Q Okay. Somebody did.  
 2 A Right.  
 3 Q All right. So -- and it's got [REDACTED]  
 4 name written on it. This was paid, but probably  
 5 shouldn't have, right?  
 6 A Right. Probably the confusing part is that it  
 7 says Tampa Electric in the middle of the page.  
 8 Q Right. That was [REDACTED] doing, wasn't it?  
 9 A I have no idea.  
 10 Q Okay. But clearly, this vehicle was in  
 11 [REDACTED] which is [REDACTED] territory, right?  
 12 A It looks like that, yes, sir.  
 13 MR. REHWINKEL: Okay. Thank you.  
 14 And so this will be [REDACTED] invoice, and this  
 15 is -- are we at 16?  
 16 COURT REPORTER: 17.  
 17 MR. REHWINKEL: 17. Sorry.  
 18 (Exhibit 17 was marked for identification.)  
 19 BY MR. REHWINKEL:  
 20 Q All right. One final [REDACTED] invoice and this  
 21 is 235, and this is a credit for a previous cost. So to  
 22 the extent the gross repair dollars were disallowed, you  
 23 would net that for the credit, correct?  
 24 A Yes, sir.  
 25 Q Because if you paid this -- and you did,

1 under contact name. Do you see that?  
 2 A Yes, sir.  
 3 Q And it says request date 16 September '17,  
 4 right?  
 5 A Right.  
 6 Q Invoice date 21 September '17?  
 7 A Right.  
 8 Q All right. Now, let's go -- and it looks like  
 9 it's for a hydraulic pump, piston, and some labor and  
 10 freight, and then totals to -- I can't see the number --  
 11 [REDACTED], right?  
 12 A Yes, sir.  
 13 Q All right. So let's look down here at the  
 14 notation on 9/16. It says, "Traveled to [REDACTED],  
 15 checked unit operation and ordered hydraulic pump NDA,  
 16 return to [REDACTED]" And then 9/20, "Traveled to  
 17 [REDACTED], replaced hydraulic pump and tested operation."  
 18 Do you see that?  
 19 A Yes, sir.  
 20 Q Now, my reading of that is that [REDACTED]  
 21 was down in [REDACTED], an [REDACTED] vehicle broke on the 16th  
 22 in S [REDACTED] and he went up to check on it a couple of  
 23 times, it got fixed, he went back to [REDACTED] Is  
 24 that what it seems to say?  
 25 A Or the technician from [REDACTED] went to [REDACTED].

1 right?  
 2 A Yes, sir.  
 3 Q And you shouldn't have? Well, you shouldn't  
 4 have paid the overall repair?  
 5 A Correct.  
 6 Q You would have paid the net amount, so it  
 7 would be appropriate to take off the net amount?  
 8 A Correct.  
 9 MR. WAHLEN: Do we call that 18?  
 10 MR. REHWINKEL: Yes. So this will be Core  
 11 Return Credit.  
 12 (Exhibit 18 was marked for identification.)  
 13 BY MR. REHWINKEL:  
 14 Q Do you know whether [REDACTED] was billing  
 15 time to TECO?  
 16 A I would have to check the -- well, I don't  
 17 know. That's an SEE company, and so we really didn't  
 18 receive timesheets for them.  
 19 Q Well --  
 20 A I don't think.  
 21 Q Let's go back and look at page 78.  
 22 MR. WAHLEN: He's going to show it up here.  
 23 MR. REHWINKEL: Well, actually, you're going  
 24 to need to get 78 through 120 because it's the  
 25 whole -- it's a series of documents that needs to

1 be looked at, but you can pull up the first page.  
 2 MR. WAHLEN: What pages are we looking at?  
 3 MR. REHWINKEL: 78 through 120.  
 4 BY MR. REHWINKEL:  
 5 Q Do you recognize what this document is?  
 6 A I recognize it as a per diem document, but --  
 7 Q Oh, I apologize. Let's put 78 through 79  
 8 aside and I want to look at -- I mean, 81 is the page I  
 9 really want to turn to. I apologize. No, 82. Sorry.  
 10 Does this appear to be a summary of  
 11 timesheets, time reports for [REDACTED] employees?  
 12 A It's a summary of timesheets. I don't know if  
 13 it's [REDACTED] or not. There's nothing really to mark it.  
 14 Q Okay. Well, let's go, then -- let's look  
 15 at -- do you have page -- pages 1 through 3? I think I  
 16 might have made that an exhibit. I don't have it.  
 17 MS. YOUNG: You said 103?  
 18 MR. REHWINKEL: 1 through 3. Wait. Let me  
 19 stop. I'm looking for the invoice that [REDACTED] -  
 20 MR. SCHULTZ: Actually, it's in two different  
 21 places.  
 22 MR. REHWINKEL: You're right.  
 23 BY MR. REHWINKEL:  
 24 Q Let's go to 518 through 520. Do you know  
 25 whether -- and if you look at page 521 through 560, do

1 would be included in -- it should be shown on pages --  
 2 somewhere between pages 82 and 120?  
 3 A This doesn't look like it has any supervisors  
 4 on it.  
 5 Q Well, on page 82, can you tell me what the  
 6 designation in the Time Reporting CD -- I could give you  
 7 a copy of 82 if you want it.  
 8 A Sure.  
 9 MR. WAHLEN: It's up here on the screen.  
 10 THE WITNESS: And what was the question?  
 11 BY MR. REHWINKEL:  
 12 Q I'll just hand that to you there. Right there  
 13 in the middle, one of the columns, it says Time  
 14 Reporting.  
 15 A Okay.  
 16 Q And it says CD. I don't know what CD means.  
 17 Or is that code? What is -- so OTD is overtime double,  
 18 double time; is that right?  
 19 A I believe so.  
 20 Q And then OFF, what does that mean?  
 21 A It should be that they were off. I don't  
 22 know. Off -- off equipment, off [REDACTED] I'm not sure.  
 23 Q Well, should you be billed for that if they're  
 24 off; do you know?  
 25 A If they were present on our system, we should

1 you know whether these documents are supporting  
 2 timesheets for the [REDACTED] invoice that's on page 517 --  
 3 What documents -- would you agree that the  
 4 documents on page 82 and 521 are ones that support  
 5 invoices that [REDACTED] submitted to you?  
 6 A Yes, sir.  
 7 Q Okay. So which one of these, whether it's the  
 8 one on 521 or 82, is the one that is the final time  
 9 summary of AEP employees for the bill that you  
 10 ultimately paid and are asking for recovery for?  
 11 A I would have to check my files to see which is  
 12 which.  
 13 Q Okay. So on 521 at the top, the heading says  
 14 Tampa Electric - Hurricane Irma - September 2017 -  
 15 Preliminary Bill - September 2017 timesheets. And then  
 16 on page 82, at the top it says Tampa Electric -  
 17 Hurricane Irma - September 17 - Final timesheets.  
 18 A Those should have been with any adjustments or  
 19 whatever that was needed, any adjustments that were  
 20 needed.  
 21 Q When you say "those," you mean --  
 22 A The final.  
 23 Q Page 82 through 120?  
 24 A Yes, sir.  
 25 Q So if [REDACTED] did work for TECO, his time

1 be billed for those hours because they could be sick or  
 2 whatever but still on our system.  
 3 Q Okay. And OTE is extended overtime? Is that  
 4 like time and a half?  
 5 A I don't know.  
 6 Q Oh, you don't know. Okay.  
 7 Would REG -- I'm looking, like, under -- for  
 8 [REDACTED], and the names appear to be below -- they're  
 9 at the bottom of the total. So [REDACTED], he's got  
 10 REG, it looks like a half an hour, and OT of an hour,  
 11 and then OTD of 14 and a half. Do you see that? So is  
 12 that regular time, overtime and double time?  
 13 A It would appear to be.  
 14 Q Okay. And if I'm looking at these and I  
 15 see -- well, let's look at [REDACTED] Go down to -- you  
 16 see the date? It looks like the first day he worked was  
 17 on the 11th. He worked a half hour regular and an hour  
 18 of overtime and then he was double time after an hour  
 19 and a half.  
 20 A And starting on the 15th they started  
 21 subtracting out those hours is what the parentheses is.  
 22 Q Well, does that mean for -- like, if I look  
 23 at -- that's what I wanted to know. So if I look at the  
 24 15th, there's a line, it says 16, and then there's a  
 25 parentheses of 16. So it looks like he didn't work for

1 you-all that day.  
 2 A Correct.  
 3 Q And so all of these other days, from the 15th  
 4 down to the 22nd, they credited off his hours?  
 5 A Yes.  
 6 Q So you didn't get charged for them?  
 7 A Correct.  
 8 Q All right. Do you know why that occurred?  
 9 A Probably because he was working [REDACTED] that day.  
 10 Q So did somebody initially code him to TECO and  
 11 then have to go back and take it off?  
 12 A Usually what I've seen for most utilities is  
 13 that they use a consolidated timesheet and then as they  
 14 do their billing, they will either code it so that it  
 15 filters it out or they will subtract it out, as [REDACTED] has  
 16 done here, on a separate line.  
 17 Q Okay. But you're kind of dependent upon them  
 18 to do that? Because it looks like at least for TECO,  
 19 the default was "put them on TECO" and then somebody had  
 20 to go and pull them back off; is that right?  
 21 A Yes, sir.  
 22 Q Now, did you question any of these people on  
 23 pages 82 through 120 as far as whether the separation  
 24 between TECO and [REDACTED] was done correctly?  
 25 A No, sir.

1 A I can't tell. 33612.  
 2 Q Okay. So if that's a zip code, we could look  
 3 at that?  
 4 A That's a Tampa zip code.  
 5 Q Is it?  
 6 A Yes, sir.  
 7 Q Okay. That's what that -- where do you see  
 8 33612?  
 9 A Just below the line there. Yeah, it says  
 10 Tampa, Florida.  
 11 Q Okay. All right.  
 12 A 33612.  
 13 Q All right. So let's look at -- I want you to  
 14 hold this one and then look at page 237 and tell me,  
 15 does that look like the same crew, if the representation  
 16 of who was eating the meals is right?  
 17 A Yes, sir.  
 18 Q And who appears to be the crew chief there or  
 19 the supervisor?  
 20 A [REDACTED]  
 21 Q Okay. Now, can you tell from that page 237  
 22 that that appears to be in Adele (sic), Georgia at  
 23 2:00 p.m. on the 12th?  
 24 A Cordele, Georgia.  
 25 Q Cordele? Okay. So C-O-R-D-E-L-E?

1 Q Okay. So with this document, if we were able  
 2 to find [REDACTED]'s name on here -- and I don't know  
 3 if it's on here or not. There's a lot of people to look  
 4 at and it's not in alphabetical order.  
 5 If we found his name on here and he had  
 6 charged time to TECO on the 16th, let's say, when these  
 7 other documents say he was down in [REDACTED] or  
 8 [REDACTED] that wouldn't be right, would it?  
 9 A No, sir.  
 10 Q But I'm not -- just for the record, I'm not  
 11 saying that that's the case. I'd have to look at the  
 12 timesheet.  
 13 All right. Let's go -- I want to ask you to  
 14 look at page 238. And I'm going to hand this to you and  
 15 ask you if you can tell me, first of all, what that is  
 16 for.  
 17 A It looks like some type of meal receipt.  
 18 Q Do you know the date on this receipt?  
 19 A Something September.  
 20 Q Okay. It's kind of hard to read, isn't it?  
 21 A Yes, sir.  
 22 Q All right. Do you know where this crew was  
 23 that appears to be eating on this date?  
 24 A Again, I can't tell.  
 25 Q You have to speak up a little bit.

1 A Yes, sir.  
 2 Q Okay. And if you look at page 84, can you see  
 3 [REDACTED] time on the 12th?  
 4 A Yes, sir.  
 5 Q All right. So he has how many hours on the  
 6 12th?  
 7 A He has 18 hours.  
 8 Q And is that double time?  
 9 A Yes, sir.  
 10 Q All right. And you're looking at page 84.  
 11 How many hours did he work on the 13th and 14th?  
 12 A 13th was 14.5. 14th was 16.  
 13 Q All right. And let me ask you to look at  
 14 page 239. Can you tell me what that is?  
 15 A It was a receipt from IHOP, Tampa, Florida,  
 16 September 13th, [REDACTED].  
 17 Q And what's the date and the time?  
 18 A The time was 11:15.  
 19 Q Okay. So would it be fair to say he and his  
 20 crew looked to be finishing up a heavy breakfast at  
 21 about noon on the 13th, looking at that amount on the  
 22 IHOP bill?  
 23 A Yes, sir.  
 24 Q And after the 13th, how many more days did he  
 25 work for Tampa Electric?

1 A It looks like just the 14th.  
 2 Q And then did somebody credit off all his  
 3 time --  
 4 A Yes, sir.  
 5 Q -- between there and the 22nd?  
 6 A Yes, sir.  
 7 Q All right. So he was in Cordele, Georgia  
 8 on -- or he and his crew were in Cordele, Georgia on the  
 9 12th. They ate a big breakfast on the 13th, and gave  
 10 you a day maybe on the 14th and then they went to [REDACTED]  
 11 A Yes, sir.  
 12 Q Is that the expectation you have from a crew  
 13 like that?  
 14 A I don't, but --  
 15 Q Now, you're not aware of any adjustments of  
 16 [REDACTED] or his crew's time, are you?  
 17 A No, sir.  
 18 Q Okay. Nor for any of these meals?  
 19 A No, sir.  
 20 Q Would TECO have provided meals for him while  
 21 he was working?  
 22 (Mr. Moyle entered the deposition at this  
 23 time.)  
 24 A It depends on what time he arrived. You know,  
 25 if he was -- he was traveling on the 12th, I would have

1 MR. REHWINKEL: 82 through 120.  
 2 MR. WRIGHT: Thank you.  
 3 MR. WAHLEN: And that's --  
 4 MR. REHWINKEL: These are -- and the title  
 5 would be [REDACTED] Final Timesheets. I've got a bunch of  
 6 little stickers on here, but they're not necessary.  
 7 So that will be 20.  
 8 (Exhibit 20 was marked for identification.)  
 9 MR. MOYLE: Are these going to be shown on the  
 10 screen?  
 11 MR. WAHLEN: We've been showing them on the  
 12 screen, Jon, yes.  
 13 MR. REHWINKEL: But that's a 40-page document  
 14 and I looked at page -- I think we talked about  
 15 page 84 on there.  
 16 MR. MOYLE: Do I need to drive or will it be  
 17 driven remotely?  
 18 MR. WAHLEN: Well, going forward, as Charles  
 19 is asking about documents, they'll show up on the  
 20 screen.  
 21 MR. MOYLE: Thank you.  
 22 MR. WAHLEN: That's what's been going on while  
 23 you were gone.  
 24 MR. MOYLE: Okay. Thanks for clarification.  
 25 MR. WAHLEN: He just didn't mark them as an

1 to find out if he -- Cordele -- from Cordele to Tampa,  
 2 because Interstate I-75 was closed at least part of one  
 3 or so days because of flooding from the Santa Fe River.  
 4 I'd have to find out if they stayed in South Georgia,  
 5 North Florida somewhere and maybe didn't arrive to Tampa  
 6 until, you know, when they ate at IHOP and then went to  
 7 work.  
 8 BY MR. REHWINKEL:  
 9 Q Okay. Now, what you said, travel times, you  
 10 couldn't go on Google Maps and put in a place and a  
 11 place and get the travel time and assume that's how long  
 12 it took somebody to get somewhere in that time, right?  
 13 A No, sir.  
 14 MR. REHWINKEL: I want to make -- I forgot  
 15 what number we're on. Are we on 18?  
 16 MS. YOUNG: 19.  
 17 MR. REHWINKEL: 19. I'm going to put pages  
 18 237 through 239 as one exhibit, and we'll call this  
 19 [REDACTED].  
 20 (Exhibit 19 was marked for identification.)  
 21 MR. REHWINKEL: And I don't think I made pages  
 22 82 through 120 an exhibit, so I want to make those  
 23 documents an exhibit.  
 24 MR. WRIGHT: Please state the page numbers  
 25 again, Charles.

1 exhibit until you got back.  
 2 BY MR. REHWINKEL:  
 3 Q All right. I want to turn to page 266 through  
 4 282. Do you have those?  
 5 A Yes, sir.  
 6 Q Okay.  
 7 A I think.  
 8 Q All right. So this appears to be a summary --  
 9 the first page is a summary of [REDACTED] at the  
 10 Renaissance Hotel in Atlanta, Atlanta Waverly Hotel &  
 11 Convention Center. Do you see that?  
 12 A Yes, sir.  
 13 Q Okay. Are you familiar with this bill?  
 14 A Not totally, but go ahead.  
 15 Q All right. So it looks like there's a  
 16 handwritten notation of [REDACTED] and then there's a  
 17 separate one for [REDACTED]. And do you know what the  
 18 separation between those two numbers is? Is one for  
 19 meals and one for rooms, if you can tell?  
 20 A I have to find the receipt -- other receipts  
 21 to see, but it appeared to add up to [REDACTED].  
 22 Q Okay. Look on page 282. Do you see the  
 23 notation where it says 114 room nights?  
 24 A Okay.  
 25 Q And is the [REDACTED] an hour rate on the 11th in

1 Atlanta, is that a reasonable cost for mobilization?  
 2 A I'm sure that's what we had to agree to pay.  
 3 Q Is this type of rate something that was normal  
 4 for crews that came down and stayed in, say, the Georgia  
 5 area on the 10th and 11th?  
 6 A It just depends on where they could find rooms  
 7 and truck parking. And I remember Hurricane Jeanne we  
 8 put crews at Saddlebrook because that was the only rooms  
 9 available for them.  
 10 Q So can you tell me from this bill what the  
 11 checkout date for these hotel rooms was?  
 12 A This says through the 14th.  
 13 Q If this represents hotel stays in Atlanta  
 14 through the 14th, was that -- is that something -- and  
 15 I'm not trying to suggest that it is. It says that at  
 16 the top, but there are notations that indicate the 11th.  
 17 A Usually, you know, when I've dealt with  
 18 [REDACTED] before, if you reserve, that's your block dates,  
 19 but the actual dates that you pay for are -- can be  
 20 different. So it looks like they must have called ahead  
 21 or whatever to reserve the 11th through the 14th, but --  
 22 Q Okay. But if I look in here in the invoice  
 23 detail, it looks like the room night is the 11th and  
 24 they're out on the 12th. Is that right?  
 25 A Yes, sir.

1 would want to make sure that we had those people  
 2 eventually. But I'm just trying to think if there  
 3 were any contingents of [REDACTED] that traveled directly  
 4 to [REDACTED], and I don't remember any.  
 5 MR. REHWINKEL: Okay. Well, I think I  
 6 identified pages 266 through --  
 7 MR. WAHLEN: 282 is what you said.  
 8 MR. REHWINKEL: But what I really mean is 290.  
 9 That's the entire bill. It's a 25-page document,  
 10 and I want to give this -- are we at 21? 21. So  
 11 this will be Atlanta Renaissance Bill.  
 12 (Exhibit 21 was marked for identification.)  
 13 MR. WAHLEN: I think he's going to talk -- are  
 14 you done talking about that?  
 15 MR. REHWINKEL: I think so, yes.  
 16 BY MR. REHWINKEL:  
 17 Q I want to hand you page 295 and ask you to  
 18 take a look at that invoice. Can you tell me if this is  
 19 a receipt that was paid?  
 20 A I'm not sure, but if it was included in our  
 21 pack, we probably did.  
 22 Q Can you tell me what it's for?  
 23 A It looks to be for food at a restaurant.  
 24 Q Can you tell me what date and what restaurant  
 25 that food was eaten?

1 Q Okay. Now, do you know if all of these  
 2 employees in this, if there's 114 like the document  
 3 says, if they all work for TECO?  
 4 A They would have all been working for TECO.  
 5 Q Did somebody go through and verify that these  
 6 names corresponded with a roster?  
 7 A No, sir, most likely not.  
 8 Q All right. So if these names were not shown  
 9 on the [REDACTED] Final timesheets, this bill would not be  
 10 appropriate to pay to the extent they were not on the  
 11 roster?  
 12 A I'm not sure that they -- how we could say  
 13 that they wouldn't be -- have done work for Tampa  
 14 Electric on the 13th or whenever they finally got here.  
 15 Q Well, if the names weren't on the roster at  
 16 all --  
 17 A Right.  
 18 Q -- to the extent they were absent from the  
 19 roster, then they shouldn't be included in -- I mean,  
 20 their hotel rooms shouldn't be paid for; is that right?  
 21 A Right. But I don't --  
 22 MR. WAHLEN: He's not asking you if that  
 23 actually occurred. He's asking you conceptually  
 24 if --  
 25 THE WITNESS: Conceptually, yeah. I mean, we

1 A No, sir, I can't.  
 2 Q Should you have paid that bill?  
 3 A Most likely not.  
 4 Q Let's go down a little bit. Can you -- okay.  
 5 So this bill was paid because there's a credit card  
 6 number on it, right?  
 7 A Right.  
 8 Q But you don't know who paid it or where it was  
 9 eaten or when?  
 10 A I would think that [REDACTED] was the person  
 11 who paid it, but no. I mean, we would have required a  
 12 detailed invoice, credit card receipt.  
 13 MR. REHWINKEL: Let me see. I may have -- all  
 14 right. Well, okay. So let's look at -- I want to  
 15 make that 22, and this will be Unknown [REDACTED] Meal.  
 16 Is that fair? All right.  
 17 (Exhibit 22 was marked for identification.)  
 18 BY MR. REHWINKEL:  
 19 Q So page 296, let me hand this to you. Can you  
 20 tell me what that represents?  
 21 A It looks like meals at Texas Roadhouse,  
 22 Gainesville, Florida.  
 23 Q And what time?  
 24 A 9:45 p.m.  
 25 Q And that's on the 12th?

1 A Yes, sir.  
 2 Q And Archer Road is below where the Santa Fe  
 3 River crosses I-75, right?  
 4 A Yes, sir.  
 5 Q Okay. So -- all right. Let's see that.  
 6 And then I want to hand you page 297. And  
 7 actually, you can hold onto this and compare -- see if  
 8 -- is that the same crew eating in [REDACTED]  
 9 on the 11th?  
 10 A It appears to be [REDACTED]  
 11 Q And they're finishing lunch at Cracker Barrel  
 12 at 12:30 p.m.?  
 13 A Yes, sir.  
 14 Q All right. Do you know if this crew stayed at  
 15 the Waverly Resort in Atlanta?  
 16 A I have no idea.  
 17 Q Okay. Let's see. So they were in [REDACTED]  
 18 on the night of the 11th and in Gainesville at least at  
 19 lunchtime on the 12th; is that right?  
 20 A 9:45 p.m.  
 21 MR. WRIGHT: Lunch on the 11th.  
 22 BY MR. REHWINKEL:  
 23 Q Oh, I'm sorry. Gainesville at 9:45 --  
 24 A P.m.  
 25 Q -- p.m. on the 12th. So Gainesville's not in

1 BY MR. REHWINKEL:  
 2 Q So look on page 93 and 94. Well, let's  
 3 look -- yes. You see [REDACTED] he's at the top of 93.  
 4 That's a summary. And then it looks like on page 93,  
 5 they credited off his time from the 15th onward. So it  
 6 looks like he's got time here on the -- he's got double  
 7 overtime of 16 hours on the 14th and double overtime of  
 8 14 and a half hour on the 13th; is that right?  
 9 MS. YOUNG: What page?  
 10 MR. REHWINKEL: Page 93.  
 11 MS. YOUNG: It looks like it's line number 4.  
 12 MS. PONDER: Well, his time is above his name.  
 13 THE WITNESS: Okay.  
 14 BY MR. REHWINKEL:  
 15 Q Was that right?  
 16 A What?  
 17 Q That he worked the 13th and 14th and then  
 18 didn't work for TECO after the 14th?  
 19 A Yes, sir.  
 20 Q Okay. And it appears, based on an answer you  
 21 gave earlier, that given the way [REDACTED] did their  
 22 consolidated timesheets, that he ultimately worked for  
 23 another utility after you-all?  
 24 A Yes, sir.  
 25 Q So his crew put in two days?

1 TECO territory, right?  
 2 A No, sir. It's 31 hours difference between  
 3 [REDACTED] and Gainesville.  
 4 Q But it appears to be the same crew and they  
 5 made it as far as Gainesville?  
 6 A Correct.  
 7 Q All right. Let me give you page 298 and ask  
 8 you to take a look at that, and tell me what crew that  
 9 is and tell me when and where that meal was eaten.  
 10 A That was [REDACTED] and it does not provide a  
 11 location or date.  
 12 Q Okay. Was that paid?  
 13 A I'm sure it was.  
 14 Q Should it have been?  
 15 A No, sir.  
 16 Q And I want to hand you back page 20 -- I mean  
 17 Exhibit 20, which is the Final Timesheets, and ask you  
 18 to look on page 93 and 94. And you might want to  
 19 hold --  
 20 MR. REHWINKEL: Let's do this before I finish  
 21 asking you this question. Pages 296, 297 and 298  
 22 we're going to call [REDACTED] Invoices. And let  
 23 me hand that to you and ask you -- oh, let her make  
 24 a marking on it so she knows.  
 25 (Exhibit 23 was marked for identification.)

1 A Yes, sir.  
 2 Q Do you have any idea whether this crew was  
 3 asked to be here for TECO and had trouble getting down  
 4 here, or that they were really going to [REDACTED] and they  
 5 spent a few hours with you-all and then went on to [REDACTED]  
 6 A They would have been called for us.  
 7 Q Do you know why they got there so late?  
 8 A No, sir.  
 9 Q Let me ask you about page 294, if we could go  
 10 back to that.  
 11 A Okay.  
 12 Q Now, does it look like at 2:41 in the  
 13 afternoon at Millers Ale House, that [REDACTED] crew  
 14 is finishing up -- some people in [REDACTED] crew are  
 15 finishing up a meal?  
 16 A It looks that way.  
 17 Q Okay. Now, based on the timesheet we just  
 18 looked at, was that crew working for TECO on the 15th?  
 19 A It didn't look like it.  
 20 Q Okay. So was this receipt paid?  
 21 A It most likely was, but again, I'd have to see  
 22 when we released them.  
 23 Q Well, if he's got zero time on the 15th, he  
 24 wouldn't have been working for you, right, or he's  
 25 working for free?

1 A Well, he's working for free according to [REDACTED]  
 2 Q These guys don't work for free, do they?  
 3 A No, but accountants sometimes make things easy  
 4 on themselves.  
 5 Q I got you.  
 6 MR. REHWINKEL: So page 294, we'll call it  
 7 Millers Ale House Receipt, and we'll make that  
 8 whatever the next number is.  
 9 MR. WAHLEN: 24 is what I have.  
 10 MS. YOUNG: Is the timesheet 24?  
 11 MR. REHWINKEL: Is 20.  
 12 MR. WAHLEN: 20.  
 13 (Exhibit 24 was marked for identification.)  
 14 MR. WRIGHT: Is it just page 294 that's  
 15 Exhibit 24?  
 16 MR. REHWINKEL: Yes.  
 17 MR. WRIGHT: Thank you.  
 18 BY MR. REHWINKEL:  
 19 Q All right. I want to go to page 320. I  
 20 always thought of [REDACTED] as a country music singer,  
 21 not a lineman, but we'll move away from that.  
 22 All right. Do you have page 320?  
 23 MR. WAHLEN: It's up there on the screen for  
 24 you.  
 25

1 under challenge?  
 2 A No, sir.  
 3 Q Okay. Well, let me ask you a series of  
 4 questions about that. Do you have your own set there  
 5 or --  
 6 A I can get them.  
 7 Q Oh, no. Use that one. I can ask from this.  
 8 MR. WRIGHT: Excuse me, Charles. Are you  
 9 going to scroll through these?  
 10 MR. REHWINKEL: Yes.  
 11 MR. WRIGHT: Okay. Great. Thank you.  
 12 MR. WAHLEN: And did you identify these as 25?  
 13 MR. REHWINKEL: Yes, 25, and we called it the  
 14 [REDACTED] receipts or invoices, whatever we called  
 15 them.  
 16 BY MR. REHWINKEL:  
 17 Q Let's look -- before we get into the questions  
 18 about this, let's look at -- well, is there a man named  
 19 [REDACTED] -- let's go to page 20.  
 20 A 320?  
 21 Q I'm sorry. Exhibit 20. Exhibit 20. And  
 22 within Exhibit 20, let's go to page 105. And do you see  
 23 about two-thirds of the way down a [REDACTED]  
 24 A Yes, sir.  
 25 Q Now, she shows time on the 12th of 17 hours,

1 BY MR. REHWINKEL:  
 2 Q I'm going to hand you 320 through -- 320  
 3 through 334. We're going to call this the [REDACTED] I'm  
 4 just going to hand this to you. You can work off that.  
 5 MR. REHWINKEL: I want to make this 25, and it  
 6 will be called the [REDACTED] Invoices.  
 7 MR. WAHLEN: [REDACTED]  
 8 MR. REHWINKEL: Yes, [REDACTED] It's that name  
 9 up there.  
 10 (Exhibit 25 was marked for identification.)  
 11 BY MR. REHWINKEL:  
 12 Q Can you tell me whether this crew ever worked  
 13 for TECO in TECO's territory?  
 14 A May I see?  
 15 Q Oh, I'm sorry.  
 16 A Is this an [REDACTED] group?  
 17 Q Well, it's an [REDACTED] stack.  
 18 A The name doesn't ring a bell.  
 19 Q Okay. Well, all right. Do you know whether  
 20 the invoices that are in pages 320 through -- or the  
 21 receipts that are in 320 through 334 were paid?  
 22 A Yes. If they were part of the [REDACTED] invoice, we  
 23 would have paid them.  
 24 Q Do you recognize any of those invoices or  
 25 those names as being part of an adjustment that [REDACTED] made

1 on the 13th of 14 hours, on the 14th -- I mean on the  
 2 13th of 14 hours, on the 14th of 16 hours, and the 15th  
 3 at nine hours. Do you see that?  
 4 A Yes, sir.  
 5 Q And it has that off code. Do you see that?  
 6 A Yes, sir.  
 7 Q We don't know exactly what that means?  
 8 A No, sir.  
 9 Q All right. But there's no parentheses showing  
 10 that it's pulled out of the total charges, is there?  
 11 A No, sir.  
 12 Q All right. And let's see. You see up about a  
 13 quarter of the way down, there's a [REDACTED]  
 14 [REDACTED]  
 15 A Correct.  
 16 Q Okay. And [REDACTED] has time on the 13th,  
 17 14th, 15th, 16th and 17th, and 14 hours on the 17th; is  
 18 that right?  
 19 A Yes, sir.  
 20 Q All right. Look at pages 320 through 324 of  
 21 Exhibit 25 and tell me if these don't represent hotels  
 22 in [REDACTED] in on the 14th and out on the  
 23 15th.  
 24 MR. WAHLEN: Can we go off record for just a  
 25 second after he answers that?

1 MR. REHWINKEL: Yes, after he answers.  
 2 A Yes, sir. It looks like the 14th, out on the  
 3 15th.  
 4 MR. REHWINKEL: Okay. Now let's go off the  
 5 record.  
 6 (Discussion off the record.)  
 7 BY MR. REHWINKEL:  
 8 Q I think if you look on page 105 of Exhibit 20,  
 9 I think I directed you to the hours of [REDACTED],  
 10 [REDACTED], and not [REDACTED]. And [REDACTED] hours were  
 11 the same as [REDACTED]; is that correct?  
 12 A Yes, sir.  
 13 Q Okay. So it shows them -- well, nine hours on  
 14 the 15th. So we have them and we have hotel rooms in  
 15 [REDACTED] Do you know -- is there a notation on the  
 16 hotel rooms of who was staying in those hotel rooms on  
 17 the pages 320 through 324?  
 18 A It just appears they were all paid for by  
 19 [REDACTED].  
 20 Q Okay. And on -- do you see -- let me see  
 21 that. Let me see the document. I didn't put a page  
 22 number down.  
 23 Yeah, look at page 334, the last page in that  
 24 exhibit, and tell me if that's a receipt for a meal at  
 25 Cheddar's, and it says [REDACTED] and I submit to you that

1 Florida at a Cracker Barrel on the 13th at 11:33 a.m.  
 2 finishing up; is that right?  
 3 A Yes, sir.  
 4 Q Okay. So after that lunch in Cracker Barrel  
 5 in Gainesville that they -- well, I don't have any more  
 6 documentation about them or I didn't see any until  
 7 page 333 when it appears that they are in Perry, Georgia  
 8 on the 14th at 3:56 p.m. Do you see that? I think  
 9 they're --  
 10 A Yes, sir.  
 11 Q Okay. So would it be fair to say that  
 12 whatever work they did in territory for TECO would have  
 13 been traveling from Gainesville on the 13th around noon,  
 14 around lunchtime, and getting to TECO, doing whatever  
 15 they were doing, and then leaving the TECO area in time  
 16 to get to Perry, Georgia, which is I think somewhere in  
 17 the south central part of Georgia, in order to be  
 18 finishing a meal by 4:00 on the 14th? Does that look  
 19 like the chronology?  
 20 A Yes, sir.  
 21 Q Okay. So -- and I understand you are not the  
 22 person to explain what damage assessors did, but  
 23 whatever work they do for you in territory would have  
 24 been in that less-than-24-hour period?  
 25 A Yes, sir.

1 that identifying information is in [REDACTED], and  
 2 that's where there's a Cheddar's.  
 3 A Yes, sir.  
 4 Q And it lists the people in the crew on there.  
 5 A Correct.  
 6 Q [REDACTED] is one of those; is that right?  
 7 A Yes.  
 8 Q Okay. All right. And that was at noon on the  
 9 15th, right?  
 10 A Yes, sir.  
 11 Q All right. On page 325, if you could turn to  
 12 that, it appears that that crew is in a Cracker Barrel  
 13 in Adairsville, Georgia, which I'll represent to you is  
 14 almost halfway between Atlanta and the Tennessee line on  
 15 I-75. Do you accept that?  
 16 A Yes, sir.  
 17 Q Okay. And on page 329 through 331, they are  
 18 in Tifton, Georgia in a hotel from the 12th to the 13th,  
 19 I mean arriving on the 12th and leaving on the 13th.  
 20 Does that appear to be [REDACTED] crew?  
 21 A Yes, sir.  
 22 Q All right. And on page 326, they are in the  
 23 Tifton Walmart at 8:17 a.m. shopping for snacks, right?  
 24 A Yes, sir.  
 25 Q And then on page 327, they're in Gainesville,

1 Q Okay. Now, do you have a feeling for when  
 2 damage assessment is being done? Is it done as soon as  
 3 the storm passes and that's the value you get out of it  
 4 so you know where to deploy people and how many -- if  
 5 you need extra resources, where to get them and where to  
 6 send them?  
 7 A Yes, sir.  
 8 Q Would that damage -- if those damage  
 9 assessors -- do you know whether that would have been  
 10 timely enough to be of value to Duke -- I mean to TECO?  
 11 A That's not my area of expertise. I don't  
 12 know.  
 13 Q Fair enough.  
 14 MR. REHWINKEL: All right. Jeff, it's 2:30  
 15 and we've been at it for two hours. I can keep  
 16 going. We can take a break.  
 17 MR. WAHLEN: I could use a stretch. Our  
 18 witness and court reporter could probably use a  
 19 stretch.  
 20 MR. REHWINKEL: Yes. You-all have to tell me  
 21 because I can sit for eight hours and never get up.  
 22 MR. WRIGHT: Let's go off the record.  
 23 MR. REHWINKEL: Yes, we're off the record.  
 24 (Recess from 2:30 p.m. to 2:47 p.m.)  
 25



1 MR. REHWINKEL: All right. Back on the  
 2 record.  
 3 BY MR. REHWINKEL:  
 4 Q I handed you, what is it, page 335 and 336,  
 5 and I just wanted to ask you if you can tell me what  
 6 these invoices are for and were they paid.  
 7 A 335 looks like a Cracker Barrel receipt from  
 8 [REDACTED] on September 13th. So it would be  
 9 for a meal.  
 10 Q Can you tell the date, the time of that?  
 11 A 9:58 a.m. September 13.  
 12 Q All right.  
 13 A And then the 336 is 9/12, September 12 at  
 14 11:23, and that is in [REDACTED] It's a Walmart  
 15 receipt.  
 16 Q And 11 -- what time? Is that a.m. or p.m.?  
 17 A It looks to be 11:23 a.m.  
 18 Q All right. Who is -- is there a name written  
 19 on those pages?  
 20 A [REDACTED].  
 21 Q Is it [REDACTED] on both of them?  
 22 A Well, one just has [REDACTED] It just has last  
 23 names on one of them.  
 24 Q Okay. And do you know why this person was  
 25 doing traveling from [REDACTED]

1 A I'm looking for it. No, sir, I can't.  
 2 Q And this appears to be from a crew headed by  
 3 [REDACTED]  
 4 A Yes, sir.  
 5 Q And I want to hand you page 338. You can hold  
 6 onto 337, and tell me what 338 represents.  
 7 A It's either a restaurant receipt or a bar  
 8 receipt from Ken's Bar, Macon, Georgia, September 13th,  
 9 8:26 p.m.  
 10 Q What was the date on the page 337 receipt at  
 11 Glory's?  
 12 A I can't really tell what that is.  
 13 Q Did you earlier say it was the 12th or the  
 14 13th?  
 15 A I can't really tell.  
 16 Q All right. So --  
 17 A I guess -- yeah.  
 18 Q Well, if the Glory's was the 12th and the bar  
 19 in Macon was the 13th, well, that's -- that wouldn't be  
 20 helpful to TECO restoring service, would it, that crew?  
 21 A I can't understand why -- I couldn't  
 22 understand -- I would think the one from Glory Days  
 23 Grill would be much later than 13th.  
 24 Q Okay. But in any event, it's kind of hard to  
 25 tell when the Glory Days Grill bill was incurred; is

1 [REDACTED]  
 2 A No, sir.  
 3 Q Okay. Is that towards Florida?  
 4 A I -- without a map I wouldn't know.  
 5 Q All right. Would you agree that [REDACTED] is  
 6 over there in the [REDACTED] border  
 7 area?  
 8 A Again, without a map I wouldn't know.  
 9 Q All right. Do you know whether this [REDACTED]  
 10 worked for TECO?  
 11 A He would have been part of the [REDACTED] crew.  
 12 MR. REHWINKEL: All right. Okay. I'll take  
 13 that back. I'm going to make this an exhibit and  
 14 we'll call it whatever number --  
 15 MR. WAHLEN: 26.  
 16 MR. REHWINKEL: -- 26, and we'll call it  
 17 [REDACTED] Receipts.  
 18 (Exhibit 26 was marked for identification.)  
 19 BY MR. REHWINKEL:  
 20 Q All right. Now I want to ask you about  
 21 page 337 and ask you if you can tell me what that is a  
 22 receipt for.  
 23 A This appears to be a meal receipt from Glory  
 24 Days Grill, Lutz, Florida.  
 25 Q Can you tell the time?

1 that right?  
 2 A Yes, sir.  
 3 Q And now we have on the 13th this crew in a  
 4 bar. Do we have the time on the bar in Macon?  
 5 A Well, I think this is -- it says Ken's Bar,  
 6 but it looks like it's part of a -- some type of inn or  
 7 something.  
 8 Q What makes you say that?  
 9 A The second line.  
 10 Q What does that say?  
 11 A Inn.  
 12 Q Okay. And do you know the time?  
 13 A It's --  
 14 Q 8:26 p.m.?  
 15 A It looks like 8:26 p.m., but it looks like  
 16 something Inn Macon North.  
 17 Q Okay. Now -- all right. And the receipt  
 18 doesn't have the detail to show what was ordered or  
 19 whether it was a meal or something else?  
 20 A Right.  
 21 Q Okay. Were these two on pages 337 and 338  
 22 paid?  
 23 A Yes, sir, I'm sure they were.  
 24 Q Do you think they should have been paid?  
 25 A We should have asked for more detail.

1 MR. REHWINKEL: Okay. So this will be  
 2 whatever our next exhibit is, and it will be  
 3 [REDACTED] Receipts.  
 4 MR. WAHLEN: Both of them?  
 5 MR. REHWINKEL: Yes.  
 6 MR. WAHLEN: So it's 337 and 338?  
 7 MR. REHWINKEL: Yes.  
 8 (Exhibit 27 was marked for identification.)  
 9 BY MR. REHWINKEL:  
 10 Q I want to turn to pages 348 through 356. I'm  
 11 going to hand you these hotel receipts and ask you to  
 12 take a look at them and tell me, first of all, the  
 13 location and the date of those motel stays, if you can.  
 14 A It looks like [REDACTED]. It  
 15 looks like arriving 9/23, departing 9/24.  
 16 Q Okay. And what was the total amount of those?  
 17 Is that at a Baymont?  
 18 A It is.  
 19 Q In [REDACTED]  
 20 A Correct.  
 21 Q Do you know whether those hotel receipts were  
 22 paid?  
 23 A I would have to check the reconciliation, but  
 24 it's possible they were.  
 25 Q Should they have been paid?

1 MR. LARUSSA: That's 28.  
 2 MR. REHWINKEL: We'll call these [REDACTED]  
 3 Hotel Receipts.  
 4 (Exhibit 28 was marked for identification.)  
 5 MR. REHWINKEL: Jon, you're not on mute.  
 6 BY MR. REHWINKEL:  
 7 Q All right. I'm going to hand you invoices  
 8 from -- or receipts from page 339 to 347 at a Holiday  
 9 Inn in Macon and ask you if you can confirm that and  
 10 tell me the date of those.  
 11 A These are 9/13, 9/14.  
 12 Q And whose name is on that?  
 13 A [REDACTED]  
 14 Q Okay. So [REDACTED] was in Macon, Georgia  
 15 on the morning of the 14th, we know?  
 16 A Yes, sir.  
 17 Q And he reported time. Would it be logical  
 18 looking at page 105 that the most he could have  
 19 performed on the time that he reported would have  
 20 been -- in territory would have been the 15th, 16th,  
 21 17th, given where he was on the morning of the 14th?  
 22 A Yes, sir.  
 23 MR. REHWINKEL: Okay. So let's -- I want to  
 24 make that an exhibit, and that will be -- what's  
 25 our next number?

1 A No, sir.  
 2 Q All right. And who is the name associated  
 3 with that?  
 4 A [REDACTED].  
 5 Q All right. Well, if you look on page -- let  
 6 me hand you Exhibit 20 and look on page 105. You see  
 7 [REDACTED] And I had him wrong before. I mixed  
 8 him up with [REDACTED]. But [REDACTED].  
 9 worked -- or he reported time on the 13th through the  
 10 17th; is that right?  
 11 A Yes, sir.  
 12 Q So he would have been released after the 17th,  
 13 right?  
 14 A Yes, sir.  
 15 Q And given that he's in [REDACTED] on the 23rd,  
 16 it seems logical that he would have gone to work for  
 17 another utility after leaving you, right?  
 18 A Yes, sir.  
 19 Q All right. I mean, you don't have other  
 20 demobilization costs for him, do you?  
 21 A No, sir.  
 22 MR. REHWINKEL: All right. And I'm just going  
 23 to hand you --  
 24 And let's make that exhibit whatever the next  
 25 number is.

1 MR. LARUSSA: 29.  
 2 MR. REHWINKEL: 29. This will be [REDACTED]  
 3 Macon Hotel.  
 4 MR. WAHLEN: And what are the page numbers?  
 5 MR. REHWINKEL: The 13th, leaving the 14th.  
 6 MR. WAHLEN: I know, but what are the --  
 7 MS. PONDER: Page numbers.  
 8 MR. REHWINKEL: Oh, page numbers. I'm sorry,  
 9 339 through 347.  
 10 (Exhibit 29 was marked for identification.)  
 11 BY MR. REHWINKEL:  
 12 Q All right. Now, before I go to the trouble of  
 13 making this an exhibit, I wanted to ask you, you said  
 14 there were some [REDACTED] hotel receipts that had been  
 15 adjusted or you found that were not paid --  
 16 A Right.  
 17 Q -- because they were out of period.  
 18 Do you know -- I'm going to hand you these  
 19 that begin on page 357 and run through 388.  
 20 A Yes, these are the ones.  
 21 Q Those are the ones?  
 22 A Yes, sir.  
 23 Q These are Westin?  
 24 A About [REDACTED] worth.  
 25 Q Okay. This is the Westin down in [REDACTED]

1 A Yes, sir.  
 2 Q Now, do you know why that was submitted?  
 3 A It looked like they had just included it in  
 4 the total package.  
 5 Q That you determined that this [REDACTED] wasn't  
 6 included in what they submitted for --  
 7 A Right. And I would have to check those also.  
 8 Q When you say "those," you mean the  
 9 [REDACTED]  
 10 A Yes, sir.  
 11 Q -- receipts? Okay. Is there a way to do that  
 12 in any --  
 13 A Timely fashion?  
 14 Q Yes.  
 15 A We could possibly find the reconciliation  
 16 sheet that those were on and see if that amount was on  
 17 the reconciliation sheet.  
 18 Q Let me ask, would 30 -- if I do a late-filed  
 19 exhibit, I want to do a late-filed deposition exhibit  
 20 and ask for [REDACTED] hotel receipt reconciliation. And what  
 21 I want -- we'll give that the title, [REDACTED] Hotel Receipt  
 22 Reconciliation. But what I want to do is ask for any  
 23 reconciliations that you did or determinations that they  
 24 were never included in the invoice in the first place.  
 25 A Okay.

1 MS. PONDER: Yes.  
 2 MR. REHWINKEL: -- Lutz Hilton Garden Inn  
 3 Receipts.  
 4 (Exhibit 31 was marked for identification.)  
 5 THE WITNESS: What's your question about  
 6 these?  
 7 BY MR. REHWINKEL:  
 8 Q Okay. My question is were these receipts  
 9 paid?  
 10 A They were because we didn't have the rooms for  
 11 these crews that Tampa Electric paid for, so they  
 12 procured their own rooms.  
 13 Q Okay. So when I look on page 105, I see that  
 14 [REDACTED] worked a 14-hour day for TECO; is that  
 15 right?  
 16 A According to this.  
 17 MR. WRIGHT: On what date?  
 18 MR. REHWINKEL: On the 17th.  
 19 MR. WRIGHT: Thank you.  
 20 BY MR. REHWINKEL:  
 21 Q And so would you have paid for his hotel night  
 22 on the 17th?  
 23 A If we released them after 6:00, 6:00 p.m., we  
 24 would have most likely paid for that room until the next  
 25 morning.

1 Q Do you understand?  
 2 A Yes, sir.  
 3 MR. REHWINKEL: Okay. Jeff, does that make  
 4 sense?  
 5 MR. WAHLEN: Yes, sir.  
 6 BY MR. REHWINKEL:  
 7 Q Because -- and just for the record, if it was  
 8 never included, a reconciliation wouldn't show it up,  
 9 right?  
 10 A Right.  
 11 MR. WAHLEN: So, Charles, we'll either provide  
 12 you with a reconciliation or a statement that it  
 13 was not included in the exhibit.  
 14 MR. REHWINKEL: Yes.  
 15 (Exhibit 30 to be marked and produced as a  
 16 late-filed exhibit.)  
 17 BY MR. REHWINKEL:  
 18 Q All right. Let me give you some Hilton Garden  
 19 Inn receipts for -- on 389 through 407, and these are in  
 20 the Hilton Garden Inn in Lutz, Florida, starting on the  
 21 15th and checking out on the 18th, 389 through 407.  
 22 MR. WAHLEN: You're going to mark those as an  
 23 exhibit?  
 24 MR. REHWINKEL: Yes. We're going to make that  
 25 31, and it will be -- 31, right?

1 Q Okay. Is that the policy?  
 2 A Yes, sir.  
 3 Q Okay. All right. Turn to page 404 in that  
 4 Exhibit 31. Can you tell me the name of the person on  
 5 that hotel invoice?  
 6 A [REDACTED].  
 7 Q Do you know whether [REDACTED] was on the  
 8 roster for TECO?  
 9 A I have to go back to the original rosters  
 10 because I'm thinking that these aren't total time for  
 11 everybody.  
 12 Q When you say "these aren't total time," are  
 13 you talking about Exhibit 20?  
 14 A Yes, sir.  
 15 Q And you think that [REDACTED] billed you for more?  
 16 A They may not have billed us for some of the --  
 17 where it says "Off," I'm not sure what that meant. But  
 18 for some of them, it looks like we may be missing days.  
 19 MR. REHWINKEL: Okay. Well, let's go off the  
 20 record for a second.  
 21 (Discussion off the record.)  
 22 MR. REHWINKEL: Okay. Back on the record.  
 23 BY MR. REHWINKEL:  
 24 Q [REDACTED], I'd like to ask for a late-filed  
 25 exhibit that -- and I'm just going to call this a

1 Complete [REDACTED] Final Timesheet Summary. Does that work?  
 2 MR. WAHLEN: (Nods head.)  
 3 BY MR. REHWINKEL:  
 4 Q And what I'm looking for is a complete  
 5 document that shows the roster and timesheet summary of  
 6 [REDACTED] workers in searchable format if available. I mean,  
 7 if you've got it in Excel, you know, that's even better,  
 8 but a searchable PDF would be okay. An explanation of  
 9 the time codes in the final timesheet document like  
 10 Exhibit 20 as well as the status of [REDACTED] as a  
 11 TECO restoration worker.  
 12 Do you understand what I'm looking for?  
 13 A Yes.  
 14 Q Okay. Thanks.  
 15 MR. WAHLEN: That's number 32?  
 16 MR. REHWINKEL: 32, yes, late-filed number 32.  
 17 And we made this 31.  
 18 (Exhibit 32 to be marked and produced as a  
 19 late-filed exhibit.)  
 20 MR. REHWINKEL: I've only got five more  
 21 minutes before I turn it over.  
 22 BY MR. REHWINKEL:  
 23 Q Okay. I want to give you -- I want to hand  
 24 you page 410 and ask you, on the right-hand side,  
 25 whether that receipt for [REDACTED] on the 17th at 8:08 at

1 work for [REDACTED] at wherever their staging area is. What  
 2 do you pay from that point on until [REDACTED] starts paying?  
 3 A There was some horse trading that took  
 4 place --  
 5 Q Okay.  
 6 A -- during that time because -- especially, [REDACTED]  
 7 didn't have enough rooms for the people that night, the  
 8 night of the 17th. So they, you know, asked if they  
 9 could start -- you know, they could stay wherever they  
 10 were at, wherever we had them bill it to, until the next  
 11 day and start then.  
 12 Q Now, who paid for that?  
 13 A Probably Tampa Electric, I mean, but if  
 14 they -- if they -- I think most of the crews submitted  
 15 that time -- if it was not a Tampa Electric, you know,  
 16 lodging that we already had blocked, [REDACTED] picked up that.  
 17 Q Okay.  
 18 A And probably should have picked this up too.  
 19 Q And I think what I'm going to do, it's 3:15  
 20 and I told Mr. Moyle he could talk. I'm going to think  
 21 about that and I may want to come back and revisit, sort  
 22 of, that overlap because there's some logic to it, but I  
 23 want to understand what kind of demarcation there was  
 24 there. And I'm also going to want to ask you if there  
 25 was any sort of e-mail traffic or anything that explains

1 Glory Days Grill was paid and if it should have been  
 2 paid.  
 3 A It was probably paid and we should be asking  
 4 for more detail.  
 5 Q What kind of detail would you be looking for,  
 6 like what was eaten?  
 7 A Yes, sir.  
 8 Q Is there any concern about 8:00 on the 17th?  
 9 A There is. Well, I'm pretty sure that we would  
 10 have released crews, so they were probably returning to  
 11 that hotel and eating.  
 12 Q Is Glory Days a restaurant in a hotel?  
 13 A Well, it's near that Garden Inn. It's not too  
 14 far away.  
 15 Q Is your policy that if you release them after  
 16 6:00 on a day, then you'll pay their hotel? Do you pay  
 17 their meals too?  
 18 A Yes, sir, until they actually start to travel.  
 19 I mean, within -- they're not going to start travel  
 20 probably until that next morning.  
 21 Q Well, if they're going to work for [REDACTED]  
 22 the next day, what do you pay -- let me step back.  
 23 So hypothetically, you've got an [REDACTED]P crew  
 24 member and he's released at 6:00 p.m. and he's going to  
 25 spend the night and the next morning he's going to go to

1 that, or is this all on the phone?  
 2 A It was above me.  
 3 Q Okay.  
 4 A I was just the receiver of the information.  
 5 Q All right. Now, would you have taken that  
 6 into consideration in whether these bills were paid, or  
 7 do you think they sort of were below the radar screen in  
 8 that regard?  
 9 A Well, it would have probably been in the back  
 10 of our minds as we processed these.  
 11 Q Okay.  
 12 A And if it was, you know, we probably erred in  
 13 the area of, you know, get it paid.  
 14 MR. REHWINKEL: Well, let me do this. I'm  
 15 going to mark that as an exhibit. Are we on 33?  
 16 COURT REPORTER: Yes.  
 17 MR. REHWINKEL: Okay, 33, and we'll call this  
 18 Glory Days Grill Receipt.  
 19 (Exhibit 33 was marked for identification.)  
 20 MR. REHWINKEL: And Jon, are you on?  
 21 MR. MOYLE: I am, Charles.  
 22 MR. REHWINKEL: All right. Do you think you  
 23 can ask what you need to ask in 45 minutes?  
 24 MR. MOYLE: I can do my best.  
 25 MR. REHWINKEL: What about -- do you want an

1 hour?  
 2 MR. MOYLE: That would be good, but I'm happy  
 3 to let Schef go first if he wants to, you know,  
 4 jump in.  
 5 MR. WRIGHT: You go ahead, Jon. The only  
 6 questions I have are a few follow-ups to what  
 7 Charles is asking. They can wait until later or I  
 8 can just hand them to Charles.  
 9 MR. REHWINKEL: Okay. So go ahead, Jon.  
 10 MR. MOYLE: Okay. Thank you.  
 11 CROSS-EXAMINATION  
 12 BY MR. MOYLE:  
 13 Q Good afternoon. I'm Jon Moyle and I represent  
 14 the Florida Industrial Power Users Group and I have some  
 15 questions for you. If during the deposition you need a  
 16 break, just let us know. And I'm going to do a couple  
 17 of things. I have some documents that I want to ask you  
 18 about, and then I also have some questions that I want  
 19 to follow up on.  
 20 Can you hear me okay?  
 21 A Yes, sir.  
 22 Q Okay. Do you know the total number of dollars  
 23 that Tampa Electric is asking the Commission to award  
 24 for storm restoration efforts?  
 25 A No, sir. It's not in my purview.

1 invoices and make sure they're something that should be  
 2 paid?  
 3 A Yes, sir.  
 4 Q Okay. And then from your understanding and  
 5 knowledge, what, if anything, is done with respect to  
 6 invoices and information on the rosters or ID badges?  
 7 A I don't know that they're ever married  
 8 together at this point.  
 9 Q Okay. And as part of the data that you  
 10 gather, do you do any kind of analysis so that you  
 11 understand the cost that Tampa Electric incurs for storm  
 12 response efforts as it relates to the various cost  
 13 categories?  
 14 A I don't, no, sir.  
 15 Q Does anybody in the organization?  
 16 A I'm fairly certain someone does, but I don't.  
 17 Q And why do you say you're fairly certain that  
 18 someone does? Have you seen any information like that  
 19 or you're just thinking that's something that should be  
 20 done?  
 21 A It seems like we account for everything else.  
 22 So I'm pretty sure that someone has analyzed or done  
 23 analysis on that.  
 24 Q So if I was going to ask you this question to  
 25 say could you tell me, you know, roughly, not to the

1 Q All right. What's in your purview?  
 2 A Besides meter operations for Tampa Electric  
 3 for storms, it's to contact foreign crews, track them  
 4 coming in and gather documentation.  
 5 Q In terms of the documentation, are those  
 6 largely receipts that Mr. Rehwinkel has been discussing  
 7 with you?  
 8 A That's part of it. Before the storm, we  
 9 gathered personnel rosters, vehicle rosters, labor rate  
 10 sheets, vehicle rate sheets, travel, expected arrivals,  
 11 where crews are along their travel.  
 12 Q Okay. And I've been trying to follow this on  
 13 the phone. I'm sorry I'm not there in person. But did  
 14 I understand that you check rosters against people who  
 15 show up on the ground, or no?  
 16 A No, sir, I don't.  
 17 Q Do you know, does anybody do that on behalf of  
 18 Tampa Electric?  
 19 A Well, the rosters are given to our logistics  
 20 department and they're the ones that set up the lodging  
 21 and food and create an identification badge for the crew  
 22 members, and they would be checking that or compiling  
 23 the list.  
 24 Q Are you involved in reconciliation after the  
 25 fact, when invoices are submitted, to review the

1 exact percentage, but if I was going to ask you, could  
 2 you break down the storm cost as it relates to  
 3 mobilization, restoration and demobilization, how you  
 4 would do that?  
 5 A No, sir. I wouldn't have those costs.  
 6 Q I guess you could do that. You have all the  
 7 information to do it, but you're just not aware if it's  
 8 been done?  
 9 A I haven't done it.  
 10 Q Right. And you haven't seen any information  
 11 about that that has been done by anybody else?  
 12 A No, sir.  
 13 Q If that was done, would that be information  
 14 that you would expect to see given your position?  
 15 A No, sir. At a future storm preparation time,  
 16 I would probably expect to see, like, a per-hour cost  
 17 per man day or something cost so that we could evaluate  
 18 contractors to come in to help with restoration, but I  
 19 probably wouldn't expect to see that before then.  
 20 Q As part of the follow-up that you-all do, do  
 21 you evaluate the performance of third-party vendors that  
 22 come in and help with storm restoration efforts?  
 23 A Foreign crew coordination does not. I do not.  
 24 Q Does anybody that you know?  
 25 A That would be an energy delivery function, and

1 usually I only hear about things like that through the  
 2 grapevine.  
 3 Q And when you say "energy delivery function,"  
 4 is that a function that is performed by Tampa Electric  
 5 Company?  
 6 A As far as contractor evaluation?  
 7 Q Right.  
 8 MR. WAHLEN: Can we go off record for just a  
 9 second?  
 10 MR. MOYLE: Sure.  
 11 (Discussion off the record.)  
 12 BY MR. MOYLE:  
 13 Q So I was asking to understand whether there's  
 14 any evaluation done of the performance of your  
 15 third-party contractors, and do you know whether there  
 16 is or there isn't? Or if you don't know, you can just  
 17 say you don't know.  
 18 A I really don't know, sir.  
 19 Q Okay.  
 20 A If we have anything about a contractor, it's  
 21 usually word of mouth. I don't know of any formal  
 22 process, but there possibly could be.  
 23 Q Okay. You were shown a receipt from a bar.  
 24 Is there a policy -- do you-all pay bar receipts or no?  
 25 I would assume not, right?

1 A I believe they would have been part of the  
 2 reconciliation package, which was 14C.  
 3 MR. MOYLE: Okay. Jeff, do you know if  
 4 they've been produced or not?  
 5 MR. WAHLEN: Jon, I don't, but if you want to  
 6 ask for them as a late-filed exhibit, we can dig  
 7 them out and get them to you.  
 8 MR. MOYLE: That would be fine. Thank you.  
 9 BY MR. MOYLE:  
 10 Q And do they have a more formal name than  
 11 guidelines, if you know?  
 12 A No, sir. It's just like a seven-line or  
 13 eight-line memo.  
 14 Q Okay. And for example, I assume TECO also has  
 15 guidelines with respect to paying overtime and double  
 16 time and things like that, right?  
 17 A We pay what we have to on storm.  
 18 Q Okay. But you do have your own policy; is  
 19 that right?  
 20 A We have an internal policy. It's negotiated  
 21 with our union, the IBEW.  
 22 Q Okay. But you don't apply that policy in a  
 23 storm. You apply the policy that the third-party vendor  
 24 has in place; is that right?  
 25 A Yes, sir.

1 A We do not pay for alcohol, but it looked to me  
 2 like Ken's Bar was in a hotel or an Inn or something and  
 3 could have possibly been a restaurant also, so --  
 4 Q Right. So if somebody is getting a hamburger,  
 5 a hamburger at a place if it's a bar, you pay for the  
 6 hamburger, but you don't pay for the bourbon that goes  
 7 with it; is that right?  
 8 A Yes, sir. And this one -- this receipt did  
 9 not have enough detail. We would have required -- we  
 10 should have required more detail on the receipt.  
 11 Q Okay. And then how do you know whether you  
 12 paid for alcohol or not?  
 13 A Company policy is we don't.  
 14 Q And that's a TECO company policy?  
 15 A Yes, sir. At least, that's what I've been  
 16 told.  
 17 Q When you guys are processing receipts, do you  
 18 have a document that you're provided to say here is the  
 19 TECO guideline for reviewing receipts that come in from  
 20 third-party vendors, and you use that document to help  
 21 understand what you should pay and what you should not  
 22 pay?  
 23 A We have some guidelines, yes.  
 24 Q And have those guidelines been produced in  
 25 this case yet, do you know?

1 Q Just so I'm clear, the decision to commit  
 2 someone -- from Tampa Electric to commit to a  
 3 contractor, I mean, that's a significant decision  
 4 because from that point on they're on the clock; is that  
 5 right?  
 6 A At some point, yes, after that decision.  
 7 Q Okay. And then how is that done? Is that  
 8 done verbally? Is it done in writing? If it's done  
 9 verbally, is there a follow-up e-mail or a piece of  
 10 paper that reflects the commitment? Just explain the  
 11 commitment process to me briefly.  
 12 A Usually in Irma, resources were procured  
 13 through the regional mutual assistance groups called  
 14 RMAGs, and then we contacted the vendors either by phone  
 15 or by e-mail. If it was by phone, after the phone  
 16 conversation e-mail, we tried to send e-mails to request  
 17 documents, et cetera, and basically, at that point, sort  
 18 of formalized the commitment.  
 19 Q So do you think there's a piece of paper in  
 20 your file somewhere for every third-party vendor that  
 21 you committed to?  
 22 A I would say there's probably exceptions to  
 23 this, but yes.  
 24 Q Okay. I guess if there isn't a piece of  
 25 paper, there should have been a piece of paper, right?

1 A Yes, sir, at least electronic piece of paper.  
 2 Q And the primary regional group that you used,  
 3 it was the Southeastern group; is that right?  
 4 A Right, the Southeastern Electric Exchange.  
 5 Q Do you call them SEE for short, or what's  
 6 their nickname?  
 7 A SEE.  
 8 Q And do they in any way benefit from arranging  
 9 the provision of third-party contractors to respond to  
 10 storm relief, if you know?  
 11 A I don't -- I don't know, but I've never heard  
 12 that they get a commission or anything like that from  
 13 it. They're pretty much fully funded by the members.  
 14 Q If they were charging an administrative  
 15 processing fee, would that be something that Tampa  
 16 Electric would pay, or you'd have to think about it, or  
 17 what's the answer to that?  
 18 A I do not know, sir. It's not -- it's not in  
 19 my group that would do that.  
 20 Q Okay. And are you involved when Tampa  
 21 Electric provides crews to third parties?  
 22 A No, sir.  
 23 Q Okay. Is it fair to say that most of the time  
 24 when these third parties are coming down and providing  
 25 services, that Tampa Electric does not have a prior

1 Q Okay. And then in terms of the -- there was a  
 2 question about a document, a reconciliation document. I  
 3 think it was referenced to be 30 pages. But do you have  
 4 figures -- can you tell me, like, the total number of  
 5 bills that were questioned or challenged and what the  
 6 results of those challenges were and how much that  
 7 represented in the way of dollars?  
 8 A Off the top of my head, I don't remember how  
 9 many challenges we had.  
 10 Q I hear you flipping papers, so I assume  
 11 there's something you can look at to maybe get that  
 12 information?  
 13 A Well, I was looking at some e-mails that were  
 14 part of the reconciliation, that 14C, and I'm only  
 15 seeing [REDACTED], but I think there were possibly three that  
 16 we challenged.  
 17 Q And when you say "three," does that mean like  
 18 three particular charges or three invoices? What does  
 19 that mean?  
 20 A Three invoices and items on those invoices.  
 21 Q And do you know what the total dollar figure  
 22 represented by the challenged items was?  
 23 A No, sir, not off the top of my head.  
 24 Q But if somebody wanted to find that, they  
 25 would look in document 14C; is that right?

1 relationship with the vendors?  
 2 A In Irma that's a true statement. We had very  
 3 few contractors that we had prior relationships with or  
 4 had used before on our system.  
 5 Q And Public Counsel asked you a question about  
 6 fraud and if you had seen anything in any of the  
 7 invoices to suggest fraud, and you said that you had not  
 8 seen anything in Irma, and it caught my ear because you  
 9 specifically referenced Irma, and I was going to ask the  
 10 question a little more broadly.  
 11 Have you seen anything suggesting fraud in any  
 12 of the storm responses?  
 13 A We had -- I don't remember what storm it was,  
 14 but we had an invoice show up and apparently that  
 15 company had never submitted or never had workers on our  
 16 system. We could find no records of any of their  
 17 employees or that company at all.  
 18 Q And that led you to the conclusion that they  
 19 had an invoice for workers A, B, C and D and you didn't  
 20 have them on the ledger, that sent up a red flag that  
 21 you thought would suggest fraud; is that right?  
 22 A Yes, sir. I'm not sure how that was handled.  
 23 I don't remember.  
 24 Q I assume the bill was not paid, correct?  
 25 A No, sir. To my knowledge, it was not paid.

1 A Yes, sir.  
 2 Q Okay. Who is Brady Pope?  
 3 A Brandy Pope. She is a -- I'm not sure what  
 4 her day-to-day title is, but she works in line  
 5 clearance, vegetation management.  
 6 Q I saw her name on some invoices. What role  
 7 was she playing during the hurricane response?  
 8 A That would be for line clearance. I'm not  
 9 sure what she -- her role was.  
 10 Q But in terms of your operation, if she said  
 11 okay to pay, would that be good enough for you or would  
 12 you double-check it? I mean, just explain to me how  
 13 you're set up.  
 14 A That's a parallel. She's more a peer in the  
 15 process than anything. I'm not in that same process.  
 16 Q So she had responsibility for line clearance  
 17 charges; is that right?  
 18 A Yes, sir, tree trimming.  
 19 Q Okay. And then what were your areas of  
 20 responsibility?  
 21 A Our distribution line, line restoration,  
 22 providing the crews for that.  
 23 Q So tree trimming invoices. Would you have any  
 24 knowledge or information about tree trimming invoices?  
 25 A No, sir.

1 Q And that would be Brandy; is that right?  
 2 A Yes, sir, or somebody in that group.  
 3 Q Okay. Do you find that the utilities when a  
 4 storm is coming, that they are oftentimes competing for  
 5 third-party resources?  
 6 A It's appeared the last few storms that that is  
 7 more and more the case.  
 8 Q And tell me how that happens.  
 9 A There are only a certain number of companies  
 10 that do this work and they're pretty well-known. So if  
 11 an FPL or a Duke can secure those resources before us,  
 12 then we have to go further and further out to get  
 13 resources.  
 14 Q So do you-all call these companies  
 15 independently and just pick up the phone and call  
 16 Joe's -- you know, I don't know the name of the company,  
 17 but just call it Joe's Line Restoration Company and  
 18 they're a big company in the Midwest, and would you call  
 19 them directly?  
 20 A Sometimes. But the way we found it best to  
 21 handle is to go through the regional mutual assistance  
 22 groups and use them to offer up resources to say that,  
 23 you know, these companies have these number of people  
 24 available.  
 25 Q And how do you contact the regional group?

1 Q And what is the purpose of that call?  
 2 A It's to assess the need and see what assets  
 3 are available across the Southeastern Electric Exchange  
 4 member companies.  
 5 Q And do they do that by, kind of, running  
 6 through a list. You have 60 -- you know, 60 companies  
 7 and say, Company A, do you have resources, Company B, do  
 8 you have resources, is that how it's done, or how is the  
 9 information exchanged?  
 10 A Usually the call -- the executive director of  
 11 the SEE asks for the resources, and then the member  
 12 utilities post them to a bulletin board, basically a  
 13 spreadsheet.  
 14 Q And then is it first come, first serve? Like,  
 15 if everybody sees that bulletin board and you say, hey,  
 16 I need to pick up 200, and you contact and say, can I  
 17 get you? Or does the SEE take a leadership role and  
 18 say, okay, we're going to match these companies with  
 19 Tampa Electric, these companies with FPL? How does it  
 20 work?  
 21 A I'm not the expert on that, but my  
 22 understanding is is that once the total assets available  
 23 are determined, then each company is given a percentage  
 24 of assets dependent on their probability of damage.  
 25 Q And then the idea that, like, one utility can

1 Let's just use, for example, SEE.  
 2 A Well, we're members of the SEE. And so one of  
 3 the affected utilities would petition for a storm call  
 4 and then start the process of bringing about needs to  
 5 all the other utilities. But then our mutual assistance  
 6 coordinator, Lee Collins, could also go out to other  
 7 mutual assistance groups, regional mutual assistance  
 8 groups and petition for help, assistance.  
 9 Q And is Lee Collins a TECO employee?  
 10 A Yes, sir.  
 11 Q When you petition for a storm call, I guess  
 12 that's an e-mail that somebody sends and says, We'd like  
 13 to have a storm call with SEE; is that right?  
 14 A That's my understanding of the process. I'm  
 15 not the expert on that.  
 16 Q Have you ever been on such a call?  
 17 A I've been in listen mode on the call  
 18 calculation.  
 19 Q And I assume -- does that call go to -- are  
 20 the people on that call other utilities in the area that  
 21 may be affected?  
 22 A The affected utilities, but the Southeastern  
 23 Electric Exchange has 55 different member utilities. So  
 24 on a good call you may get 40 different utilities, at  
 25 least, on the call.

1 come in and Public Counsel used the word "poach" from  
 2 another, there is not a rule or a prohibition against  
 3 that through the SEE that you're aware of?  
 4 A As far as I know, that is highly frowned on by  
 5 the SEE. That appears to only happen outside of the  
 6 member companies.  
 7 Q Right. And you had said at least in this  
 8 situation here where we have one Florida utility that  
 9 had taken some assets from TECO; is that right?  
 10 A We had a contractor called ██████ that had  
 11 committed ██████ to us, but because we couldn't  
 12 start paying them at the same time another utility  
 13 could, they lost about ██████ to the other  
 14 utility. So by the time we were able to start paying  
 15 them, there were only ██████ assets available.  
 16 Q And were these assets third-party assets, do  
 17 you know?  
 18 A Yes, sir. ██████ is an independent group.  
 19 Q Okay.  
 20 A They pretty much contract among the co-ops and  
 21 municipals.  
 22 Q All right. And I think you had told Public  
 23 Counsel that utility was part of ██████ that  
 24 had grabbed those people; is that right?  
 25 A That's what we had heard, yes.



1 Q And I want to talk to you for a minute,  
2 shifting gears a little bit, about your objective of  
3 trying to procure people that are, I think you had said,  
4 a 12-hour drive? You'd like to get them to be within a  
5 12-hour drive of the impact area; is that right?

6 A We like to get them -- kind of our goal is to  
7 have them arrive within 12 hours after the storm clears.

8 Q Okay. And in terms of allocating these  
9 resources, SEE or others, do they try to prioritize in  
10 any way based on assets that are closer in geographic  
11 location to the affected area as compared to not?

12 A I can't answer that question. I don't know.

13 Q Okay. Mr. Rehwinkel asked you about an MUA.  
14 What is an MUA?

15 A I think he's using that as mutual agreement,  
16 mutual use agreement. I took it to mean the Mutual  
17 Assistance Group.

18 Q Okay. And is that -- that's a contract that  
19 you have with whom?

20 A Well, we have a mutual assistance agreement.  
21 When we became members of the Southeastern Electric  
22 Exchange, we agreed to their procedures and guidelines.  
23 And the other member utilities are expected to follow  
24 those also.

25 Q And has that document -- I guess, is it a

1 SAE, is there, that you're aware of?

2 A Not to my knowledge, no, sir.

3 Q Okay. Mr. Rehwinkel asked you about some  
4 questions about TECO's responsibility for repairing  
5 things like an axle on a truck that might be en route to  
6 assist Tampa Electric. Do you recall that?

7 A Yes, sir.

8 Q And is that done -- do you say, yes, we'll fix  
9 the axle on a truck, is that done because that's a TECO  
10 policy, or your understanding that that's something  
11 that's contained within the SEE arrangement, or what's  
12 the basis for that?

13 A I believe that's part of the SEE procedures  
14 and guidelines that the members when we -- when a member  
15 responds to an event, they would be responsible for any  
16 normal maintenance, normal wear and tear. But if  
17 something happened to a vehicle in response to an event,  
18 then the utility that was -- you know, that contractor  
19 or that utility was en route to you would be -- would  
20 pay for the -- or if they were on the system especially,  
21 pay for the repair.

22 Q So, for example, if there was a third-party  
23 vendor down there with a truck and the truck got in an  
24 accident, who would pay for the damages associated with  
25 a truck being damaged in an accident?

1 document that you sign and SEE signs?

2 A I'm not sure if it's a signed document or how  
3 that occurs or if it's just procedures and guidelines if  
4 you become a member of the group.

5 Q Are you familiar with the document?

6 A Just parts of it.

7 Q And has that document been produced in this  
8 case, do you know?

9 MR. WAHLEN: Jon, I think we've agreed to  
10 provide that as a late-filed exhibit.

11 MR. MOYLE: So I don't need to ask for another  
12 one, Jeff?

13 MR. WAHLEN: No. And just as an aside, I  
14 think Beth Young probably is a little more up to  
15 speed on the details of SEE and how that all works  
16 and what membership means than Wes, but you're  
17 welcome to continue asking the questions.

18 MR. MOYLE: No, that's -- I appreciate that,  
19 and he's --

20 MR. WAHLEN: He's doing good.

21 MR. MOYLE: If he doesn't know, he's telling  
22 me he doesn't know, so that's fine.

23 BY MR. MOYLE:

24 Q And I thought I heard an SAE agreement, but  
25 that may have been SEE agreement. There's not anything

1 A Third-party non-SEE members, that's -- it's a  
2 different animal. We'd probably have to address that  
3 individually.

4 Q And if it was a third-party SEE member, who  
5 would pay for it?

6 A It would -- I'm not sure on an accident.  
7 We're talking --

8 Q How about if a tree falls on a vehicle, the  
9 same answer?

10 A I believe so. We would have to talk about  
11 that to discuss that.

12 Q Okay. And I asked you about how people were,  
13 in effect, retained or hired. What's the right term to  
14 use when talking about when you commit to someone? Is  
15 "commit" the right word or is there another term that  
16 you guys use?

17 A I'd say commitment's a good term for it.

18 Q Okay. And then the term on the back end, what  
19 is that?

20 A Release.

21 Q Okay. And how do you release people?

22 A The procedure or, you know, how it flows?

23 Q Yes. Just tell me how -- you know, how it  
24 takes place.

25 A Well, usually asset management, resource

1 management would -- because they're in contact with the  
2 service areas, the managers, they know which crews,  
3 what's going to be continued for, you know, if  
4 restoration is -- when it's going to be complete, and  
5 they will tell us what crews to release, and then that  
6 could be done on cost. It could be done on perceived  
7 work.

8 But anyway, we're told -- the foreign crew  
9 coordination group is told to release ABC utility. And  
10 so we'll call whoever the contact is for that utility,  
11 tell them that they're going to be released and that to  
12 expect an e-mail with the official release. And if they  
13 are going to be released to another utility, we'll  
14 discuss that with them and then we'll get them an e-mail  
15 as quickly as possible with that detail in it.

16 Q Do you guys text?

17 A We haven't in the past, but, you know, that's  
18 becoming more and more prevalent.

19 Q And in response to that question, you said  
20 sometimes decisions may be made on cost; is that right?

21 A Yes, sir.

22 Q And I assume, based on that, that there is  
23 some information about how much respective utility  
24 partners or third-party partners are costing on a daily  
25 basis to Tampa Electric, so that information is

1 big square?

2 MR. REHWINKEL: Oh, the square one is 1.

3 THE WITNESS: If you have Exhibit 1 --

4 MR. MOYLE: Right.

5 THE WITNESS: I think it has the invoice cost  
6 and the man-hours. And so it's kind of simple math  
7 to do a per-man-hour cost from that sheet for each  
8 utility.

9 MR. WAHLEN: Jon, those are spreadsheets that  
10 were put up on the Webex during the morning and  
11 will be part of the transcript, and they were --

12 MR. MOYLE: All right. I'm on the page now  
13 and you guys have a driver on those documents. Is  
14 there any way to go back to that document?

15 MR. WAHLEN: Yeah.

16 MR. ALDAZABAL: Yes.

17 THE WITNESS: Contract, crew cost. There you  
18 are. And if you un-hide or scroll so that F  
19 through whatever.

20 Get the hours and divide that into the cost  
21 would give at least an approximate cost per  
22 man-hour.

23 BY MR. MOYLE:

24 Q So in Column T, that represents hours, and  
25 Column U is the invoice cost, and you would do the math

1 available?

2 A Right. We would -- up front we would ask for  
3 labor rates, vehicle rates. And so then the accounting,  
4 you know, component that advises resource management  
5 would develop, you know, daily cost per utility or per  
6 man or whatever to help them make those decisions.

7 Q All right. So have you seen those documents?

8 A No, sir.

9 Q Because that's not part of your scope of  
10 responsibilities, but there's another group that you  
11 think has those documents?

12 A Yes, sir. I stay busy enough with my  
13 day-to-day job.

14 MR. MOYLE: Right.

15 Do you know if any of those documents have  
16 been produced in this case, Jeff or anybody?

17 MR. WAHLEN: I don't know, Charles -- I mean  
18 Jon. We're in the thousands of documents. I  
19 haven't looked at all of them.

20 MR. MOYLE: Yeah. All right. Well, if it's  
21 okay, I'd like to make a late-filed request for any  
22 documents that reflect the relative cost of people  
23 responding to the storm as the witness described.

24 THE WITNESS: If you have the -- I think it  
25 was called Exhibit 2, or was this Exhibit 1, the

1 to get there; is that right?

2 A Yes, sir, on at least a gross basis.

3 Q And the invoice cost, is that the rolled-up  
4 invoice in terms of all expenses, travel and hotels and  
5 everything like that? Is that what that would  
6 represent?

7 A Correct. Yes, sir.

8 Q Okay. But I guess labor is the biggest  
9 component of that, correct?

10 A It is. But, you know, vehicles, all of that  
11 kind of rolls into the costs we're going to have to pay  
12 for each man-hour used. So that's the reason I was  
13 making the suggestion.

14 Q Okay. I want to follow up on a question -- a  
15 line of questions that Mr. Rehwinkel asked with respect  
16 to meals. Do you have responsibility or are comfortable  
17 answering some questions about meals?

18 A Yes, sir. I'll try.

19 Q Okay. Am I right that there's a per diem rate  
20 in a lot of these invoices for, like, [REDACTED] is  
21 that right?

22 A There may be. I'm not sure. I know that one  
23 [REDACTED]  
24 [REDACTED]

25 Q What's your understanding of what a per diem

1 is for?  
 2 A Per diem is for any offset from what you would  
 3 consume if you didn't travel.  
 4 Q Explain that, please.  
 5 A Usually -- you know, I was in the military for  
 6 20 years and per diem always to us was if we were at  
 7 home base our costs were pretty well fixed. But if we  
 8 went to Washington, D.C., then we're going to have to  
 9 pay for a hotel, and a hotel is more expensive than it  
 10 is in Tampa, Florida. So hotels and meals, the per diem  
 11 was to pay for that difference between sleeping at home  
 12 and sleeping in a hotel and paying for food.  
 13 Q Okay. And would you agree that if you are  
 14 getting paid a per diem rate, that you shouldn't then  
 15 necessarily get paid for your meals and your hotel on  
 16 top of a per diem rate?  
 17 A Each company -- you would have to do almost  
 18 line by line to negotiate that with the companies and  
 19 figure that out.  
 20 Q Do you-all engage in those kinds of  
 21 discussions with companies before committing to them?  
 22 A Not in storms. If it was day-to-day work,  
 23 yes, we would engage in all of that.  
 24 Q And in storms you don't; you just kind of say  
 25 go and then you'll deal with it later when they send an

1 makes a call. Who is Thad?  
 2 A Thad Lopez was the manager in resource  
 3 management during Storm Irma, Hurricane Irma.  
 4 Q Okay. And I saw on a document or two that  
 5 actually crews were coming from [REDACTED]; is that right?  
 6 A Yes, sir.  
 7 Q And is that something that's happened in prior  
 8 storms, or is this the first time you've had crews come  
 9 from [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 Q Right. So that evolved because somebody knew  
 15 some people in [REDACTED] and said, I think maybe we can get  
 16 these folks down, or did the SEE provide a lead to the  
 17 [REDACTED] third party? How did that come about?  
 18 A That's above me. I don't know. But I'm  
 19 pretty sure it wasn't through the SEE.  
 20 Q Okay. And have you ever seen any situation  
 21 where the hourly rate was reduced or not as high as the  
 22 hourly rate when somebody is actually working as  
 23 compared to traveling?  
 24 A I don't recall any. You know, like a travel  
 25 rate?

1 invoice?  
 2 A Yes, sir.  
 3 Q All right. So would you agree with me that if  
 4 monies were being paid for per diem and for meals that  
 5 were obtained at restaurants and for hotel beds that  
 6 were obtained at hotels during the same period of time,  
 7 that that would appear to be duplicative?  
 8 A It would appear to be, yes, not ethical.  
 9 Q Yeah.  
 10 A But --  
 11 Q And then also, you indicated, like, so for a  
 12 crew that's working in the area, not on their way down,  
 13 but if they're restoring services, that Tampa Electric  
 14 provides them three meals a day; is that right?  
 15 A That's normally our policy, yes.  
 16 Q And similarly, you would agree that if you're  
 17 paying a per diem, I mean, you shouldn't be able to get  
 18 a per diem and then also have the company pay for your  
 19 three meals, correct?  
 20 A Again, I don't know a specific situation or --  
 21 I mean, it doesn't sound ethical, but we pretty much  
 22 have to sort that out at some point.  
 23 Q Yeah. I'm going to walk you through a few  
 24 invoices, if I could. Just a couple of other questions.  
 25 You had said earlier that someone named Thad

1 Q Right.  
 2 A I don't recall any.  
 3 Q You would agree that travel is typically less  
 4 strenuous than clearing lines or repairing lines,  
 5 correct?  
 6 A Yes, sir, but that man still has that skill  
 7 set.  
 8 Q Yeah. So let's look at a few invoices here  
 9 and I'll walk through those and I'll try to wrap this  
 10 up. You know, Public Counsel has been gracious to give  
 11 me a little time.  
 12 And if I ask you questions about invoices  
 13 related to trees, you wouldn't have any information  
 14 about them?  
 15 A No, sir.  
 16 Q Can we go to -- it's a Bates stamp number  
 17 1255.  
 18 A 1255.  
 19 MR. ALDAZABAL: I've got it on the board.  
 20 MR. WAHLEN: Make sure it's the page at the  
 21 bottom.  
 22 THE WITNESS: Okay.  
 23 MR. MOYLE: Let's go off the record real  
 24 quick.  
 25 (Discussion off the record.)

1 BY MR. MOYLE:

2 Q Before you is a document that at the bottom  
3 says 1255, and at the right-hand side at the top it says  
4 OPC's First Request for Production of Documents filed  
5 April 9, 2018. Can you identify this document?

6 A No, sir.

7 Q You can't?

8 A No. The only --

9 Q Do you, as part of your job responsibilities,  
10 review invoices for hotels?

11 A If they're part of the package, yes, sir, I  
12 do.

13 Q And are they typically part of the packages  
14 that you review?

15 A Yes, sir.

16 Q Okay. So even though you can't review -- or  
17 you're not familiar with this document, you're familiar  
18 with this as being a hotel invoice, correct?

19 A Yes, sir.

20 Q Okay. Do you know, is there a standard  
21 operating procedure or anything in guidelines anywhere  
22 that suggest putting the names of the people who stayed  
23 in the room on the actual invoice?

24 A We don't have any guidelines. It's usually up  
25 to the companies. And I know when I travel with people

1 trimming group, [REDACTED] and I wouldn't have had  
2 anything to do with it.

3 Q Okay.

4 A To my knowledge, we only had one group of  
5 distribution people in a hotel in Tampa that would have  
6 charged us for that.

7 Q Okay. So let me take you to a document in  
8 front of me, 56B, as in boy.

9 A 56B.

10 Q I think it's a supplemental of June 19, 2018.

11 A What set are you in, sir?

12 Q It was on a separate disc. I think it was on  
13 the second disc, maybe the third disc.

14 MR. WAHLEN: Does it have a legend up in the  
15 right-hand corner, Jon?

16 MR. MOYLE: It does.

17 MR. WAHLEN: What does it say?

18 MR. MOYLE: OPC's First Request for Production  
19 of Documents filed April 9, 2018, and then  
20 underneath that it says Supplemental June 19, 2018.

21 MR. WAHLEN: Okay. Thank you. Hold on.

22 MR. MOYLE: This is an [REDACTED]. This is an [REDACTED]  
23 invoice.

24 MR. ALDAZABAL: What number was it, Jon?  
25 Supplemental what?

1 myself, because I'm usually the one with the company  
2 purchase card, most of the time the rooms wind up in my  
3 name. It may be -- we may write it -- I usually write  
4 it when I do the credit card reconciliation for our  
5 accounting department, but not every company has that  
6 requirement.

7 Q So on this document that I'm referencing you,  
8 I see the name of [REDACTED] and a  
9 number underneath that. I surmise that those were the  
10 two people who used that room. Would that be correct  
11 based on your understanding of having reviewed hotel  
12 invoices?

13 A Yes, sir.

14 Q And the number that is right under their name,  
15 would that be a badge number or a roster number or -- if  
16 you know, what would that number represent?

17 A I do not know.

18 Q And is there any way on this invoice to know  
19 what company this is for?

20 A No, sir.

21 Q Is there any way to know if this was paid or  
22 not?

23 A Not without looking at the complete invoice.  
24 Could you maybe scroll up and -- hold it, go back down.

25 Okay. I'll bet you that this is a tree

1 MR. MOYLE: The Supplemental up at the right  
2 says June 19, 2018, and the document is Bates  
3 stamped at the bottom 56B, as in boy.

4 MR. WAHLEN: It's the attachment.

5 MR. MOYLE: Off the record.

6 (Discussion off the record.)

7 MR. MOYLE: Back on the record.

8 BY MR. MOYLE:

9 Q I'm showing you an [REDACTED] invoice. If I ask you  
10 questions about this, will you be comfortable answering  
11 them?

12 A If it's for line distribution, but there's a  
13 good possibility it is. It has my name on it, but --  
14 Okay. Your questions?

15 Q Where is your name on this?

16 A Up at the top. It's in the Attention.  
17 Attention, Accounts Payable, Wes Caldwell.

18 Q Okay. Do you know if this invoice was paid?

19 A Yes, sir.

20 Q And was it?

21 A It was.

22 Q Okay. And what was this for?

23 A This was basically for the labor, the fringe,  
24 incidentals.

25 Q And how do you know that? Was there backup

1 that came along with this or no?  
 2 A There should have been backup with it, but the  
 3 description there -- the first line of description is  
 4 pretty much the summary for this invoice.  
 5 Q The first line of the description doesn't say  
 6 much, does it?  
 7 A Labor and fringes, outside services,  
 8 materials.  
 9 Q But I don't think those line items relate to  
 10 this invoice, do they?  
 11 A They actually relate to the [REDACTED] that  
 12 was paid February 9th.  
 13 Q And where do you get the information that that  
 14 amount was paid on February 9th?  
 15 A It's highlighted right now.  
 16 Q Okay. And then this is a re-bill of that sum  
 17 or a catch-up of that sum or not sure?  
 18 A Not sure, but an additional -- this looks like  
 19 the labor and fringes, outside services adders.  
 20 Q The labor and fringes is [REDACTED], right?  
 21 A Yeah, that was the labor. There must be more  
 22 to this.  
 23 MR. REHWINKEL: Can we go off record for a  
 24 second?  
 25 MR. WAHLEN: Sure. Jon, is that okay with

1 it would be paid?  
 2 A Usually we would want some other documentation  
 3 backup, et cetera. I would have to see that.  
 4 Q You have all the documents down there in Tampa  
 5 with you now. Can you or anybody in the room refer you  
 6 to any backup for this invoice?  
 7 MR. WAHLEN: Jon, we've got thousands of  
 8 documents here.  
 9 MR. ALDAZABAL: This one?  
 10 BY MR. MOYLE:  
 11 Q Well, let me ask you this. Did you authorize  
 12 the payment of this invoice?  
 13 A I would have sent it forward for payment.  
 14 Q And part of your duties and responsibilities  
 15 is to look and see, okay, should this be paid or you  
 16 need to have a favorable recommendation or ask questions  
 17 about certain things; is that right?  
 18 A Yes, sir.  
 19 Q And did you have any questions about the  
 20 invoice that I'm showing you dated 4/25/18, 56C, as in  
 21 cat?  
 22 A I don't recall any questions about  
 23 [REDACTED]  
 24 Q And that's, in part, because the distinction  
 25 you're drawing is invoices from other electric companies

1 you?  
 2 MR. REHWINKEL: Jon, do you mind?  
 3 MR. MOYLE: Sure.  
 4 (Discussion off the record.)  
 5 MR. MOYLE: Let's go back on the record.  
 6 BY MR. MOYLE:  
 7 Q The next document, it's 56C and that's from  
 8 [REDACTED] Have you seen this invoice before?  
 9 A Yes, sir.  
 10 Q And was this amount of money, a little over [REDACTED]  
 11 [REDACTED], paid?  
 12 A To my knowledge, yes, that's -- we paid about  
 13 [REDACTED]  
 14 Q And it says that the invoice is for  
 15 distribution and fleet expenses incurred during mutual  
 16 assistance in September 2017.  
 17 A Yes, sir.  
 18 Q I assume that there's more information for  
 19 this million dollars than what's found on page 56C; is  
 20 that right?  
 21 A I would hope so, but this -- [REDACTED]  
 22 [REDACTED] is a Southeastern Electric Exchange company. And  
 23 so they have different reporting requirements than a  
 24 third-party contractor.  
 25 Q So could they just send a bill like this and

1 typically don't have to have the level of detail that  
 2 has to accompany invoices from third parties; is that  
 3 right?  
 4 A Yes, sir.  
 5 Q Okay. And then the next invoice, this is 56D,  
 6 as in dog. Have you seen this invoice before? I think  
 7 it says Attention Mr. Caldwell.  
 8 A We're getting there. Okay. [REDACTED].  
 9 Q If you go down a little bit to where the  
 10 numbers are, have you seen this invoice before?  
 11 A Yes, sir.  
 12 Q And did you forward this for payment?  
 13 A Yes, sir.  
 14 Q And was it paid?  
 15 A To my knowledge, yes, sir.  
 16 Q Okay. And is this typical of the invoices  
 17 that you receive from electric company members of SEE  
 18 for payment for services rendered?  
 19 A I think there is more to this invoice than  
 20 just the pages that you have.  
 21 Q And why do you say that?  
 22 A Well, because we wouldn't have just sent this  
 23 forward with just the -- this is a summary page.  
 24 Q Are you able to show me or tell me where the  
 25 additional information might be?

1 A Additional information is in OPC's Fifth Set  
 2 of Interrogatories, pages 677 through 814. And then  
 3 OPC's Fifth Set of Interrogatories from July 17th, pages  
 4 5573-A through 553-FI.  
 5 Q Okay. Thank you.  
 6 I'll direct you --  
 7 MR. MOYLE: And I'm trying to wrap up here to  
 8 get within my hour. I don't know how I'm doing.  
 9 MR. REHWINKEL: You're over it, but don't  
 10 worry.  
 11 MR. MOYLE: Shocker. Sorry, Charles.  
 12 BY MR. MOYLE:  
 13 Q Document 5573-F, as in Frank.  
 14 MR. REHWINKEL: What does it say up in the  
 15 corner, Jon?  
 16 MR. MOYLE: It says OPC's Fifth Set of  
 17 Interrogatories, interrogatory number 76, and I'm  
 18 looking at page 6 of 1361.  
 19 THE WITNESS: May I have those documents back?  
 20 MR. REHWINKEL: (Presenting documents to  
 21 witness.)  
 22 MR. ALDAZABAL: Can you repeat that, Jon?  
 23 Sorry.  
 24 MR. MOYLE: Sure. Fifth Set of  
 25 Interrogatories, interrogatory number 76, page 6 of

1 Q Okay. Do you know if [REDACTED] had a default  
 2 hourly provision that people would get paid for a  
 3 certain number of hours regardless of whether they  
 4 worked those hours or not?  
 5 [REDACTED]  
 6 [REDACTED]  
 7 Q And which companies do you recall having it?  
 8 A I couldn't recall off the top of my head. I'd  
 9 have to go back through my notes, e-mails.  
 10 Q So, to go to the document itself, with respect  
 11 to the work that was done on September 10th through  
 12 September 15th, the document shows that the people were  
 13 [REDACTED]  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 [REDACTED]  
 22 [REDACTED]  
 23 [REDACTED]  
 24 [REDACTED]  
 25 [REDACTED]

1 1361.  
 2 MR. REHWINKEL: It's here.  
 3 MR. ALDAZABAL: You got it right there.  
 4 MR. REHWINKEL: Yes. It's the numbering at  
 5 the top, not the numbering at the bottom.  
 6 MR. MOYLE: The bottom number is 5573-F, as in  
 7 Frank.  
 8 MR. REHWINKEL: It's the last --  
 9 Jon, let's go off the record. Jeff had to  
 10 step out.  
 11 MR. MOYLE: Okay.  
 12 (Discussion off the record.)  
 13 BY MR. MOYLE:  
 14 Q I'm showing you a document that is page 6 of  
 15 1361, OPC's Fifth Set of Interrogatories, interrogatory  
 16 number 76. The document at the bottom is 5573-F, as in  
 17 Frank. And this appears to be backup information for an  
 18 invoice; is that correct?  
 19 A Yes, sir.  
 20 Q And can you tell me who the contractor or  
 21 third-party vendor was with this invoice?  
 22 A This would have been [REDACTED].  
 23 Q How do you know that?  
 24 A Page 1 is the [REDACTED] summary, and then the  
 25 rest of it is backup information for that, for [REDACTED].

1 [REDACTED]  
 2 [REDACTED]  
 3 [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 Q And none of the people with these hours are  
 15 linemen, correct?  
 16 A It doesn't look like it.  
 17 Q Do you know what an operating supervisor does?  
 18 A No, sir.  
 19 THE WITNESS: Would these have been damage  
 20 assessors?  
 21 MR. LARUSSA: I'd have to --  
 22 BY MR. MOYLE:  
 23 Q I'm sorry?  
 24 A I was just asking Matt Larussa if these were  
 25 possibly damage assessment personnel.

1 MR. LARUSSA: From [REDACTED]  
 2 THE WITNESS: From [REDACTED].  
 3 BY MR. MOYLE:  
 4 Q Well, we're about done with my part of the  
 5 depo. Let me just finish up so we have a clean record  
 6 on it. And obviously, their titles are set forth in the  
 7 document.  
 8 So I don't have -- well, I do have one further  
 9 question. Do you guys ever negotiate these rates, or  
 10 you just, kind of, pay what you get?  
 11 A For storms it's pretty much pay what you get.  
 12 Q Yeah.  
 13 A If we were -- again, if we were -- if this was  
 14 a blue sky, clear, no problems on the horizon, we  
 15 would -- our purchasing and contracts people would be  
 16 all over it.  
 17 Q Have there ever been discussions about while  
 18 the winds aren't blowing, trying to identify good  
 19 responders and put in place deals with them at  
 20 negotiated rates?  
 21 A We've tried that, but as soon as you do that,  
 22 they are -- another utility will pick them up before you  
 23 get there or whatever before you have the need, and so  
 24 you wind up going back out on the street.  
 25 Q Yeah, I guess, you know, you have good lawyers

1 REDIRECT EXAMINATION  
 2 BY MR. REHWINKEL:  
 3 Q I just want to ask you just as a follow-up to  
 4 Jon, if you could go to the top line of the document.  
 5 So we see -- is it [REDACTED] on the 11th, Monday  
 6 he's got 18 hours -- no, I'm sorry, the 10th -- 18  
 7 hours. Do you see that?  
 8 A Yes, sir.  
 9 Q And that says Field Hours. And then on the --  
 10 if you go to the bottom half of the document,  
 11 [REDACTED] on the 10th says eight hours.  
 12 A I think that was one that we questioned. I  
 13 don't -- I think there might be a revision to this that  
 14 took him out of that.  
 15 Q Okay. Now, this is in the supplemental  
 16 information. That will be a [REDACTED] that guy  
 17 worked, right?  
 18 A Right.  
 19 Q And that kind of was a red flag?  
 20 A Yes, sir.  
 21 Q So if we saw that same document in the  
 22 original information we got in the 5500, 73 pages, and  
 23 then we saw it again in the supplemental, would we  
 24 conclude they didn't adjust it?  
 25 MR. REHWINKEL: I think I gave the court

1 representing you, but in terms of paying them a retainer  
 2 and having damages, if they go somewhere else, has that  
 3 ever been part of anything considered by the company?  
 4 A I'm not sure. That's above my level.  
 5 MR. MOYLE: Okay. Thank you. Thank you for  
 6 your time.  
 7 And Charles, I appreciate you giving me a  
 8 crack at this in the middle of your questions.  
 9 MR. REHWINKEL: No problem.  
 10 Jon, do you mind if I make that last document  
 11 you asked about a late-filed exhibit -- I mean a  
 12 deposition exhibit?  
 13 MR. MOYLE: No, that's fine.  
 14 MR. WAHLEN: 35.  
 15 MR. REHWINKEL: Let's leave that up there and  
 16 mark that as 34, and we'll call it [REDACTED] Management  
 17 Labor Cost Summary.  
 18 THE WITNESS: That is --  
 19 MR. REHWINKEL: I mean [REDACTED] Management Labor  
 20 Cost Summary.  
 21 THE WITNESS: Correct.  
 22 MR. REHWINKEL: Okay. And that will be 34.  
 23 (Exhibit 34 was marked for identification.)  
 24  
 25

1 reporter 682 and 573, and what I'd like to do is  
 2 add to that page 6 of 1361, which is both of the  
 3 documents. And I believe it's the same document  
 4 with no change. Is that right?  
 5 THE WITNESS: It looks like it.  
 6 MR. REHWINKEL: Okay. So Jeff, I want to make  
 7 both of those documents part of Exhibit 34.  
 8 MR. WAHLEN: Okay.  
 9 MR. REHWINKEL: And then let's have an  
 10 Exhibit 35. That would be a late-filed that asks  
 11 if there's been any -- were there any  
 12 reconciliation adjustments for erroneous time  
 13 reports from [REDACTED].  
 14 (Exhibit 35 to be marked and produced as a  
 15 late-filed exhibit.)  
 16 BY MR. REHWINKEL:  
 17 Q And is that something you understand,  
 18 Mr. Caldwell?  
 19 A Yes.  
 20 Q Okay. So it would cover the example we showed  
 21 as well as anything else that you uncovered in that look  
 22 see. Alrighty.  
 23 MR. WRIGHT: Charles, can I just ask a  
 24 clarifying question? Are we speaking of [REDACTED]  
 [REDACTED]

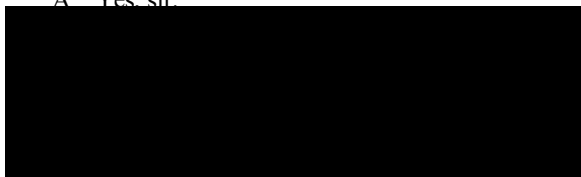
1 THE WITNESS: Yes, sir.  
 2 MR. WRIGHT: Okay. I noted that [REDACTED] is a  
 3 member of the SEE. [REDACTED] is not. I just wanted  
 4 to be clear. Thank you.

5 THE WITNESS: That's probably the reason we  
 6 have labor hours for them.

7 BY MR. REHWINKEL:

8 Q So [REDACTED], are they  
 9 affiliated?

10 A Yes, sir.



16 Q Okay. All right.

17 MR. WAHLEN: Before we change gears, it's a  
 18 quarter to five.

19 MR. REHWINKEL: Yes.

20 MR. WAHLEN: Schef hasn't asked any questions.  
 21 I wonder if it makes sense to, kind of, take stock  
 22 in where we are and what our plans are for the rest  
 23 of the day. I don't know if our court reporter  
 24 needs a break, but at least we ought to --

25 MR. REHWINKEL: Yes. Let's go off the record.

1 contractor required it, you know, said that they needed  
 2 it before they could travel or whatever, we basically  
 3 had a -- I think it might have been called a letter of  
 4 intent or whatever.

5 Q And I gather from that response that you  
 6 didn't -- you, Tampa Electric Company, did not require,  
 7 but you only did so if a vendor or a third-party  
 8 contractor required it. Is that accurate?

9 A Yes, sir.

10 Q Thank you.

11 I understood part of your earlier testimony to  
 12 be that you electronically sign some timesheets to  
 13 accommodate vendors and contractors. Is that accurate  
 14 so far?

15 A Yes, sir.

16 Q You personally could not practically have  
 17 verified any of the time reflected on those timesheets,  
 18 could you?

19 A No, sir.

20 Q So it was a courtesy and an accommodation to  
 21 the other folks in these circumstances, correct?

22 A Yes, sir.

23 Q Okay. In some discussion with Mr. Rehwinkel,  
 24 you were talking -- he asked you some questions about  
 25 whether you apply the same standards for vendors and

1 (Discussion off the record.)

2 MR. WAHLEN: We're back on the record.

3 CROSS-EXAMINATION

4 BY MR. WRIGHT:

5 Q Good afternoon, Mr. Caldwell. It's nice to  
 6 meet you earlier today. My name is Schef Wright. I  
 7 represent Florida Retail Federation. I've got just a  
 8 few questions for you, all of which follow on questions  
 9 that were asked by Mr. Rehwinkel or maybe a couple by  
 10 Mr. Moyle.

11 You may have answered this, but I just want to  
 12 be clear. Do you regard the arrangement that Tampa  
 13 Electric Company has with the other members of the  
 14 SEC -- SEE as being something like a contract in  
 15 day-to-day operations? That is, do you understand that  
 16 all the members consider themselves to be bound to  
 17 follow the agreement and the guidelines?

18 A I think they are -- it's my understanding,  
 19 yes, that we follow those procedures and guidelines.

20 Q Does Tampa Electric get any written agreement  
 21 with vendors or contractors, what we're calling  
 22 third-party vendors or third-party contractors, who are  
 23 not SEE members for storm restoration efforts as we've  
 24 been discussing today?

25 A We have and we did in this storm. If the

1 Tampa Electric employees for reimbursement. Do you  
 2 recall that line of conversation?

3 A Yes, sir.

4 Q Is that accurate? Do you apply the same  
 5 standards -- does Tampa Electric Company apply the same  
 6 standards and treatment for reimbursement requests by  
 7 vendors and contractors that you would apply to Tampa  
 8 Electric employees?

9 A We probably, as you've seen, hold our  
 10 employees to a higher standard. None of the -- most of  
 11 the receipts that Mr. Rehwinkel brought up we would have  
 12 disallowed on an expense voucher for an employee.

13 Q You talked about releasing crews to go work  
 14 for other utilities or to go home. Would the personnel  
 15 actually giving those release messages been yourself and  
 16 your other coordinators that you identified earlier on  
 17 in the deposition?

18 A Yes, sir.

19 Q Do you have records of where the crews go when  
 20 you release them? Like, if they're going to Duke, do  
 21 you know that? If they're doing to FPL, do you know  
 22 that?

23 A Usually we are told that [REDACTED] is going to  
 24 [REDACTED] or this [REDACTED] is going to [REDACTED]. You know,  
 25 we're told that because the mutual assistance



1 coordinator, Lee Collins, would have been given that on  
2 his storm call or SEE call.

3 One thing to add on that, sir, maybe two. But  
4 usually we would pass on the FPL or Duke Energy contact  
5 to those crews or we would have already passed the  
6 crew's contact information to FPL or Duke so that they  
7 could contact them as soon as we release them.

8 Q Thank you.

9 When the work is being done by another SEE  
10 member, [REDACTED] or whoever -- I went on the website and saw  
11 the list -- do they send you actual timesheets, or do  
12 they only send you timesheet summaries that look sort of  
13 like these and like the ones we saw for [REDACTED] this  
14 morning?

15 A Usually just like summaries.

16 Q In dealing with non-SEE-member third-party  
17 vendors or contractors, do you get actual timesheets or  
18 do you get summaries like these?

19 A We get both.

20 Q Do you think, then, that you would have actual  
21 timesheets for the [REDACTED] personnel?

22 A It doesn't appear that we do. It would have  
23 been probably part of that invoice package. And a lot  
24 of times, companies are now doing their time  
25 electronically. And so there aren't any daily activity

1 it's common for vendors to rent vehicles to provide  
2 service to you.

3 A It's not common, but it has been done before.  
4 It was done by [REDACTED].

5 Q Do you have any knowledge of why [REDACTED]  
6 rented vehicles?

7 A No, sir.

8 Q Do you know whether they -- the vehicles they  
9 rented were specialized for utility service or were they  
10 just, sort of, rental cars, SUVs?

11 A It looked like 4 x 4s and vans, box trucks.

12 Q Did you make any request of [REDACTED] that  
13 would -- or specialized that would require them to rent  
14 vehicles to serve you in a way that was different than  
15 normal?

16 A Not to my knowledge.

17 Q So were these invoices paid?

18 A Yes, sir.

19 Q Did any other utility rent vehicles on this to  
20 this degree?

21 A No, sir.

22 MR. REHWINKEL: I just want to -- this will be  
23 whatever the next exhibit is, 36, 37?

24 COURT REPORTER: 36.

25 MR. REHWINKEL: 36, and it will be Rental

1 reports or timesheets from individual employees.

2 Q Has Tampa Electric sent employees to work for  
3 other utilities in storm restoration pursuant to the SEE  
4 arrangement?

5 A Yes, sir. Beth Young would be more familiar  
6 with that. She's headed up those crews before.

7 Q My questions are does Tampa Electric invoice  
8 other SEC -- SEE -- I'm a Gator, sorry -- other SEE  
9 members in the same way that they invoice you, if you  
10 know?

11 A I don't know.

12 MR. WRIGHT: Okay. Thank you. That's all the  
13 questions I have for now.

14 Were we going to take a break?

15 MR. WAHLEN: I think so.

16 MR. REHWINKEL: We're off the record.

17 (Recess from 4:58 p.m. to 5:14 p.m.)

18 CONTINUED REDIRECT EXAMINATION

19 BY MR. REHWINKEL:

20 Q I want to just finish off real quick with [REDACTED].  
21 Actually, I'm through with [REDACTED]. That was an easy way to  
22 finish them off.

23 Let's talk about [REDACTED]. And on  
24 pages 643 to 653 -- and I'll hand you those documents.  
25 I'm sorry, 644 to 653. And I just wanted to ask you if

1 Invoices.

2 (Exhibit 36 was marked for identification.)

3 BY MR. REHWINKEL:

4 Q Let me go back to [REDACTED] I did have some [REDACTED]  
5 questions and let me just cover these real quick.

6 Can you look at page 120 and 520 of the [REDACTED]  
7 invoices?

8 MR. REHWINKEL: Do you have 120 there or if  
9 you can get it on the screen?

10 MR. ALDAZABAL: I got 120 on the screen.

11 THE WITNESS: The timesheet?

12 MR. REHWINKEL: Yes. Go all the way to the  
13 bottom of that. I guess it's in Exhibit 20. And  
14 then I want to say page 520 is part of an exhibit  
15 as well, because I don't have it with me.

16 MR. WAHLEN: Check Exhibit Number 18.

17 MR. REHWINKEL: 18? I don't think that's it.

18 I'm sorry. Here it is.

19 BY MR. REHWINKEL:

20 Q All right. So the total labor billed by -- or  
21 reflected there is [REDACTED]. Do you see that on  
22 120?

23 A Okay.

24 Q And then on 520, the total labor and fringes  
25 is [REDACTED]; is that right?

1 A Yes, sir.  
 2 Q Is there a document that breaks the difference  
 3 between these two numbers down in any detail?  
 4 A Not to my knowledge, there's not.  
 5 Q Do you know -- you're saying you don't think  
 6 one exists or --  
 7 A I don't recall any that breaks it down into --  
 8 any further.  
 9 Q Is there a document that just supports  
 10 whatever the difference between the [REDACTED] and the  
 11 [REDACTED] is?  
 12 A I would have thought it would be this document  
 13 that gives the fringe rates, the G&A.  
 14 Q G&A?  
 15 A Right.  
 16 Q Is there a difference in the -- is there more  
 17 than just line distribution men and the [REDACTED]  
 18 that I asked you?  
 19 A I would have to go back to the documents and  
 20 see if there are damage assessors or other personnel.  
 21 Q Is it possible that's part of the difference?  
 22 MR. REHWINKEL: Let's stay on that.  
 23 MR. ALDAZABAL: You want to stay on that?  
 24 MR. REHWINKEL: Yes.  
 25

1 costs are?  
 2 A I would have believed that those would be the  
 3 vehicle charges.  
 4 MR. WRIGHT: Charles, there was a summary  
 5 sheet that -- it was an update that had 13 and a  
 6 [REDACTED] on it that it had that block  
 7 of information with components in it that you were  
 8 looking at earlier. I remember it was on the  
 9 screen. And it had labor and it was like three  
 10 lines of material, but it all added up to the  
 11 [REDACTED] number. I just wondered if you could find  
 12 that if that might help.  
 13 MR. REHWINKEL: I don't think that had the  
 14 level of detail we're looking for there.  
 15 BY MR. REHWINKEL:  
 16 Q Are there transportation costs in Exhibit 20  
 17 that you're looking --  
 18 A That's what I was looking for.  
 19 Q Because the title of that document is Final  
 20 Timesheets. I was assuming it's all just labor.  
 21 A Just timesheets, labor.  
 22 MR. WAHLEN: Charles, if it's okay with you,  
 23 in the interest of time, if you want to see about a  
 24 late-filed exhibit, we'll dig around and find it.  
 25 MR. REHWINKEL: Yes. Let me finish this

1 BY MR. REHWINKEL:  
 2 Q Is it possible?  
 3 A Yes, sir. I mean, it's possible because I  
 4 can't explain it otherwise.  
 5 Q All right. And I think you said something  
 6 about G&A being in there, but G&A is in a separate --  
 7 the [REDACTED], that's where the G&A is, right?  
 8 A Yes, sir.  
 9 Q So that's not -- the G&A isn't in the  
 10 difference I asked you about, is it?  
 11 A It doesn't appear to be.  
 12 Q Okay. So what would you have to go back and  
 13 look at to see whether the [REDACTED] was with or  
 14 without damage assessors and tree trimming?  
 15 A The individual rosters identify the damage  
 16 assessors tree personnel on them to see if they're in  
 17 here.  
 18 Q And in here, meaning in the Exhibit 20?  
 19 A Yes, sir.  
 20 Q So let's look at -- stay on page 520, and do  
 21 you see a total transportation charge amount of  
 22 [REDACTED]  
 23 A Yes, sir.  
 24 Q Is there a document that details, that we've  
 25 been provided that's available, that shows what these

1 series of questions and we'll come back and get one  
 2 of those if we need it.  
 3 BY MR. REHWINKEL:  
 4 Q Let me give you page 81 and ask you to take a  
 5 look at that. And this appears to be a summary of per  
 6 diem costs; is that right?  
 7 A It looks that way.  
 8 Q And do you know where the per diem costs are  
 9 reflected on page 520?  
 10 A No, sir.  
 11 Q Okay. So let me hand you page 121 and ask you  
 12 [REDACTED]  
 13 [REDACTED]  
 14 A This says Outside Services. Is this from part  
 15 of an invoice or -- because Outside Services, to me,  
 16 would have been part of the logistics for incident bases  
 17 or, like, the Strawberry Festival grounds.  
 18 Q Well, look at Exhibit 20, the timesheet  
 19 summary. The last page of that is 120. So this would  
 20 be the page after that, 121. So this is part of the [REDACTED]  
 21 support information.  
 22 So the question is does that roll up somehow  
 23 or is it contained in page 520? And if so, where would  
 24 it be included?  
 25 Let me ask you about page 143 and ask you to

1 look at the [REDACTED] for employee expenses and ask  
 2 you, can you explain to me how this is reflected on  
 3 page 520?  
 4 MR. REHWINKEL: For the folks in Tallahassee,  
 5 if you want to put up 143.  
 6 A We have to go back to look, but it appears to  
 7 me that this all rolls into the bottom line work  
 8 W002961504.  
 9 BY MR. REHWINKEL:  
 10 Q On what page?  
 11 A On page 520. But I'm not sure if they added  
 12 this into the labor or exactly where they put it into  
 13 that.  
 14 Q Now, the work order you referenced ended in  
 15 what, 504?  
 16 A Yes, sir.  
 17 Q Okay. But that's --  
 18 A They have that work order -- or that work  
 19 order listed for [REDACTED], and then this total  
 20 employee expense is a summary of all those expense  
 21 lines.  
 22 Q And does it appear that those are the  
 23 expenses -- those are summarized on page 120 to 143,  
 24 when you say that some to the 120, page 125 through 143?  
 25 A Well, 125 looks like work order W0029557804,

1 A That was actually from Exhibit 2.  
 2 Q Was it 1 or 2? The big square one or --  
 3 A Yes, sir.  
 4 Q Okay. Exhibit 1. And you said you could go  
 5 to the -- there was hours and then costs.  
 6 A Correct.  
 7 Q Are those the two columns you referred to?  
 8 A Yes, sir.  
 9 Q Okay. Now, the costs -- just for clarity, the  
 10 costs that are included in the column called Costs is  
 11 invoice cost, that's more than just labor?  
 12 A Correct.  
 13 Q So you would be getting a per hour cost rate,  
 14 not a per hour labor rate?  
 15 A Right.  
 16 Q Okay.  
 17 A But if you're going to evaluate this person or  
 18 this company for future use, you'd kind of want those  
 19 weighted costs.  
 20 Q You haven't determined on a per hour basis  
 21 what the just labor rate is; is that right?  
 22 A No, sir.  
 23 Q Because the economic determination you would  
 24 make is what's cost per hour?  
 25 A For this company to come work for us.

1 which would be the first work order line of page 520.  
 2 MR. REHWINKEL: Let's go off the record for a  
 3 second.  
 4 (Discussion off the record.)  
 5 BY MR. REHWINKEL:  
 6 Q So Mr. Caldwell, I'm going to ask you for a  
 7 late-filed deposition exhibit that reconciles the  
 8 difference between the [REDACTED] and the  
 9 [REDACTED] and that includes an explanation of where  
 10 the [REDACTED] 8 are included in page 520.  
 11 Do you understand that request?  
 12 MR. WAHLEN: What are the document numbers  
 13 with all those numbers on them? Just so we have  
 14 them.  
 15 MR. REHWINKEL: Okay. So let's call this --  
 16 and for a short title we'll call it Reconciliation  
 17 of Pages 520, 120, 81, 121 and 143.  
 18 MR. WAHLEN: Okay.  
 19 (Exhibit 37 to be marked and produced as a  
 20 late-filed exhibit.)  
 21 BY MR. REHWINKEL:  
 22 Q Okay. I think -- let me turn to Exhibit 2 for  
 23 a second. I think when -- I think it was Mr. Moyle  
 24 asking you questions and you said -- he was trying to  
 25 get a per hour labor rate?

1 Q Okay. Because the company that is a base  
 2 further away and might do the exact same amount of work  
 3 as someone that's a lot closer, they would have a higher  
 4 cost rate just because it takes longer with the  
 5 mobilization cost?  
 6 A Correct.  
 7 Q Generally speaking, right?  
 8 A Yes, sir.  
 9 Q All right. Let's go to [REDACTED] at  
 10 page 609. Now, [REDACTED] was one of the companies that  
 11 you were responsible for reviewing invoices for, you or  
 12 your team?  
 13 A Yes, sir.  
 14 MR. WAHLEN: Here's page 121.  
 15 BY MR. REHWINKEL:  
 16 Q Did I say 699? I may have said 609, but I  
 17 meant 699. Do you have -- let me hand you that page,  
 18 699. Okay.  
 19 Let me ask you to take a look at that and tell  
 20 me what this is a receipt for.  
 21 A I do not know. It's for [REDACTED] purchased on  
 22 September 12th at Spring Foods. Since it has no state  
 23 sales tax or county sales tax -- oh, it's a prepay fuel  
 24 receipt. That's what it's for.  
 25 Q Okay. So if someone wrote on there "Snacks

1 for road, fuel," do you know what the check and the A  
2 means or the slash and the A means?

3 A No, sir.

4 Q That's something that the vendor would have  
5 put on the receipt?

6 A They would have put it on the receipt, but  
7 most companies won't allow you to -- you know, what you  
8 normally have to do, especially if you're using a debit  
9 card, is prepay inside for an amount of fuel.

10 Q Is that a debit card?

11 A No, sir. It's a MasterCard, but it appears to  
12 me to be the same procedure.

13 Q Well, when someone gets a receipt for prepay  
14 and fuel, does that mean that's how much fuel they --  
15 how much they pumped?

16 A Yes, sir.

17 Q When they prepay?

18 A Well, I guess they could have used prepay,  
19 pumped [REDACTED] and got [REDACTED] back.

20 Q Okay. Have you ever seen that happen?

21 A I haven't, but --

22 Q Okay.

23 A -- I'm sure it does, if I can think about it.

24 Q All right. So you can't tell whether fuel was  
25 actually pumped?

1 A No, sir.

2 Q Does it say there two people ate this meal?

3 A Yes.

4 Q And it's for September 13th at 1:45 p.m.?

5 A Yes, sir.

6 Q Okay. So if this is in the [REDACTED] package,  
7 you would assume that this is a [REDACTED] employee that is  
8 getting reimbursed for a meal at the Pelagia?

9 A Yes, sir.

10 Q And at 1:45 p.m. on September 13th was there  
11 restoration work going on?

12 A Yes, sir.

13 Q And would you accept subject -- my  
14 representation that Pelagia is a Florida-trend Golden  
15 Spoon restaurant in the Renaissance Hotel on  
16 Westshore --

17 A I've never been there.

18 Q Okay -- that describes itself as a lavishly  
19 decorated high-end Italian eatery located inside the  
20 Renaissance Hotel? Would you accept my representation  
21 that's what that hotel is -- that restaurant is?

22 A Yes, sir.

23 Q Okay. And you paid this receipt without  
24 knowing who this worker is and what work they were  
25 performing?

1 A No, sir.

2 Q Okay.

3 A Not from that receipt.

4 Q And you didn't ask for any more detail?

5 A (Shakes head.)

6 Q All right. So let's go to page 705.

7 MR. REHWINKEL: Actually, let's make 699 -- I  
8 want to make that an exhibit, and we'll make that  
9 whatever number we're at. Thirty what?

10 MR. WAHLEN: I've got 38 is next.

11 MR. REHWINKEL: 38, and we'll call it [REDACTED]  
12 Prepay.

13 (Exhibit 38 was marked for identification.)

14 BY MR. REHWINKEL:

15 Q All right. Page 705. And just before I ask  
16 you about 705, page 699, that [REDACTED] you paid?

17 A Yes, sir.

18 Q All right. 699, [REDACTED] at RH Tampa  
19 International Pelagia, that's the Renaissance Hotel, is  
20 it not?

21 A I don't know, sir.

22 Q Okay. Is this a receipt that you paid?

23 A Yes, sir, if it was included in the invoices.

24 Q All right. Do you know who this receipt was  
25 for?

1 A Yes, sir.

2 Q But obviously, they weren't out restoring  
3 service at this time during the day, were they?

4 A Apparently not.

5 Q And it says it was two people, does it not?

6 A Yes, sir.

7 Q Okay. Let me get you to look at page 7 --

8 MR. REHWINKEL: Oh, and I want to make this a  
9 late-filed -- I mean a Deposition Exhibit 39, and  
10 it will be Pelagia [REDACTED].

11 MS. PONDER: [REDACTED] you said?

12 MR. REHWINKEL: Yes.

13 (Exhibit 39 was marked for identification.)

14 BY MR. REHWINKEL:

15 Q And I want to hand you page 704. And can you  
16 tell me why on this 13th of September at 7:54 p.m., two  
17 guests were eating a [REDACTED] meal at the Pelagia on the  
18 13th?

19 A I have no idea, sir.

20 Q Was this receipt paid?

21 A Yes, sir.

22 Q Okay. Was this person restoring service for  
23 whatever length of time it takes to eat a meal in the  
24 lavishly decorated Golden Spoon restaurant?

25 MR. WAHLEN: I object to the form of the

1 question.  
 2 MR. WRIGHT: Good job, Jeff.  
 3 MR. WAHLEN: Finally got me to object.  
 4 MR. REHWINKEL: I pushed your buttons.  
 5 BY MR. REHWINKEL:  
 6 Q This person wasn't restoring service at this  
 7 time?  
 8 A No, sir.  
 9 MR. REHWINKEL: All right. So this will be  
 10 Number 40, and it will be Pelagia [REDACTED].  
 11 (Exhibit 40 was marked for identification.)  
 12 BY MR. REHWINKEL:  
 13 Q Page 706, let me ask you to take a look at  
 14 this invoice and this receipt. And was this receipt  
 15 paid?  
 16 A Yes, sir, it probably was.  
 17 MR. REHWINKEL: Okay. Scroll down a little  
 18 bit, if you would.  
 19 BY MR. REHWINKEL:  
 20 Q Do you know who [REDACTED] is?  
 21 A No, sir.  
 22 MR. REHWINKEL: Can you scroll up a little  
 23 bit?  
 24 BY MR. REHWINKEL:  
 25 Q And do you know what [REDACTED] was doing in

1 Q Should this receipt have been paid?  
 2 A We should have asked for more detail on it.  
 3 Q Okay. You don't know whether it was a meal or  
 4 what. You would assume it was, right?  
 5 A Yes, sir.  
 6 Q But it was on the 14th in [REDACTED] kind  
 7 of in the middle of your restoration activities, right?  
 8 A I would have to look to see when [REDACTED]  
 9 actually got to us, if they were traveling. They would  
 10 have been traveling.  
 11 Q Okay. If you want to take a look at that,  
 12 that's --  
 13 A [REDACTED]  
 14 Q You don't know what direction this person was  
 15 going, do you?  
 16 A Coming down or going up.  
 17 Q Well, if you would take a look at 41.  
 18 MR. REHWINKEL: And I'm going to make that 42,  
 19 the [REDACTED] receipt. We'll let her mark it. And  
 20 we'll call this [REDACTED] Receipt.  
 21 (Exhibit 42 was marked for identification.)  
 22 BY MR. REHWINKEL:  
 23 Q See if you can compare the signatures on  
 24 there, if that appears to be [REDACTED] signature.  
 25 A It's possible.

1 [REDACTED] on September 14th at 9:00 p.m.?  
 2 A No, sir.  
 3 Q He wasn't restoring service for TECO at that  
 4 time, was he?  
 5 A He should have been probably.  
 6 Q [REDACTED]  
 7 A [REDACTED]  
 8 Q [REDACTED]  
 9 A [REDACTED]  
 10 MR. MOYLE: He wasn't giving big tips either.  
 11 MR. REHWINKEL: He was looking out for the  
 12 customers, Jon.  
 13 MR. WRIGHT: He might have decided to leave a  
 14 cash tip and not seek reimbursement.  
 15 MR. REHWINKEL: There you go.  
 16 All right. In all seriousness, this will be  
 17 41 and it will be [REDACTED].  
 18 (Exhibit 41 was marked for identification.)  
 19 BY MR. REHWINKEL:  
 20 Q All right. So page 707. Can you tell me if  
 21 this [REDACTED] receipt was paid?  
 22 A Most likely it was.  
 23 Q And do you know who was in [REDACTED],  
 24 [REDACTED] on September 14th at 1:00 p.m.?  
 25 A No, sir.

1 Q Okay. And he's in Jacksonville what time?  
 2 A 9:01 p.m.  
 3 Q On what day?  
 4 A September 14th.  
 5 Q Okay. He's in Florence, South Carolina?  
 6 A September 14th at 1:00 p.m.  
 7 Q Okay. So he's traveling south?  
 8 A Yes, sir.  
 9 Q All right. So if he's in Jacksonville at  
 10 9:00 p.m., the earliest he could work for TECO would be  
 11 on the 15th?  
 12 A Yes, sir.  
 13 Q All right. Can you determine from that sheet  
 14 when the Con Ed folks were supposed to be in town -- I'm  
 15 sorry -- supposed to be in Tampa Electric territory?  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 Q So if they left -- were they in [REDACTED]  
 22 A On the 10th.  
 23 Q You would kind of expect them --  
 24 A Or 11th.  
 25 Q -- to be in TECO territory before the 15th?

1 A 13th or 14th, yes, sir.  
 2 Q Okay. Page 710, do you know who is getting a  
 3 BurgerFi burger in [REDACTED] at 8:00 p.m.?  
 4 A No, sir.  
 5 Q And that receipt was paid?  
 6 A I'm sure it was.  
 7 MR. WAHLEN: You want to mark that, Charles?  
 8 MR. REHWINKEL: Yes. That will be 42.  
 9 MS. PONDER: 43.  
 10 MR. REHWINKEL: 43, BurgerFi Receipt.  
 11 (Exhibit 43 was marked for identification.)  
 12 BY MR. REHWINKEL:  
 13 Q All right. Let me hand you page 713 and ask  
 14 you if you know who at 8:52 p.m. on the 14th was eating  
 15 a [REDACTED] meal at Bonefish Grill?  
 16 A No, sir.  
 17 Q Okay. Do you know when [REDACTED]  
 18 crews ended their workday on the 14th?  
 19 A No, sir.  
 20 Q 8:00 p.m. is a little early to be knocking it  
 21 off, isn't it?  
 22 A Yes, sir.  
 23 Q And certainly -- well, 9:00 p.m. 8:52 is when  
 24 you pay your bill, so you've probably been there an hour  
 25 or two, right?

1 on the 15th.  
 2 Q Was there anything about [REDACTED] agreement  
 3 with you that said that they're not going to take your  
 4 meals, they go out and eat during work hours?  
 5 A No, sir.  
 6 MR. REHWINKEL: Okay. This is 45, and we'll  
 7 call that the Cafe Breeze Receipt.  
 8 (Exhibit 45 was marked for identification.)  
 9 BY MR. REHWINKEL:  
 10 Q Let me ask you to look at page 718 and ask you  
 11 if that receipt was paid.  
 12 A Most likely, it was, yes.  
 13 Q Is that a receipt or is that a bill?  
 14 A It looks like a bill.  
 15 Q All right. And tell me the time and date of  
 16 that bill.  
 17 A September 16th at 9:05 p.m.  
 18 Q Okay. Now, did [REDACTED] employees leave you on  
 19 the 17th and go to work for [REDACTED]  
 20 A To my knowledge, yes, sir.  
 21 Q Okay. Do you know whether [REDACTED] gave you the  
 22 bill and [REDACTED] the receipt --  
 23 A No, sir.  
 24 Q -- as they were transitioning?  
 25 A I don't know.

1 A Yes, sir.  
 2 Q If you're going to eat a meal at that kind of  
 3 restaurant? Is that right?  
 4 A Yes, sir.  
 5 Q And it's a duplicate copy. Again, you think  
 6 that means that that's just the customer's copy?  
 7 A Yes, sir.  
 8 MR. REHWINKEL: Okay. Let's make this 44, and  
 9 we'll call it Bonefish Receipt.  
 10 (Exhibit 44 was marked for identification.)  
 11 BY MR. REHWINKEL:  
 12 Q And that receipt, 44, was paid, right?  
 13 A Yes, sir.  
 14 Q Let's look at page 716. And this is -- I'll  
 15 hand you that, page 716. And that's -- do you know --  
 16 it says two guests at Cafe Breeze on Lois Avenue in  
 17 Tampa, [REDACTED].  
 18 Do you know who was ending a meal on the 15th  
 19 at 9:16 p.m. at Cafe Breeze, two [REDACTED] average meals?  
 20 A No, sir.  
 21 Q Was that paid?  
 22 A Yes, sir.  
 23 Q Do you think that receipt should have been  
 24 paid?  
 25 A We would have provided meals, I would think,

1 Q Okay. Have you ever seen anything like that  
 2 happen?  
 3 A No, sir.  
 4 MR. REHWINKEL: All right. This will be 146,  
 5 and we'll call this the --  
 6 MS. PONDER: Well, just 46.  
 7 MR. REHWINKEL: I'm sorry.  
 8 MR. WAHLEN: TGI Friday's.  
 9 MR. REHWINKEL: Okay, 46, and it's TGI  
 10 Friday's Receipt.  
 11 (Exhibit 46 was marked for identification.)  
 12 BY MR. REHWINKEL:  
 13 Q All right. Let's look at page 720. I'm going  
 14 to give you pages 720 and 721 together, but we'll look  
 15 at 720 first. There's that. And can you tell me --  
 16 First of all, were these two pages of  
 17 documents, they represent costs that were reimbursed by  
 18 TECO, [REDACTED] on the --  
 19 A I'm sure they were reimbursed by us if they  
 20 were part of the invoice.  
 21 Q And [REDACTED].  
 22 So on the first invoice, September 16th at  
 23 12:56 p.m. in Orlando, do you know who was working for  
 24 TECO in Orlando on that day?  
 25 A No, sir.

1 Q And on the next page, on the 16th at 12:44,  
 2 those two appear to be in Orlando at around noon on that  
 3 day, right?  
 4 A Yes, sir.  
 5 Q And that's not in your territory?  
 6 A No, sir. I would have to look at the map, but  
 7 we do have Winter Haven which butts up against Orlando.  
 8 Q But Orange Avenue is kind of up in Orlando  
 9 proper, isn't it?  
 10 A I would again have to look at a map and see  
 11 exactly where this is located.  
 12 Q Okay. But assuming -- well, even if they were  
 13 working in Winter Haven, should they have been at the  
 14 Dancing Pigs Deli for lunch that day?  
 15 A If they -- it's armchair quarterbacking. I  
 16 can, you know, say, you know, if we didn't get them  
 17 meals and they went out to find -- and that's the  
 18 closest place they found to eat --  
 19 Q Yeah.  
 20 A -- you know. But if they purposely left jobs  
 21 and went there, then that's bad.  
 22 Q Okay. Well, if they were hungry, they could  
 23 have gone to the nearest Burger King or something like  
 24 that, right? I mean --  
 25 A Right, if they had power.

1 BY MR. REHWINKEL:  
 2 Q And here's page 724.  
 3 MR. WRIGHT: This is 724?  
 4 MR. REHWINKEL: Yes.  
 5 MR. WRIGHT: Thank you.  
 6 BY MR. REHWINKEL:  
 7 Q And this is at La Teresita in Tampa, right, on  
 8 the 16th --  
 9 A Yes, sir.  
 10 Q -- at 8:42 p.m. and [REDACTED].  
 11 Do you know who ate this meal, how many people  
 12 ate it, what it was for?  
 13 A No, sir.  
 14 Q Okay. Had you released crews by 8:00 on the  
 15 16th, or 8:42 on the 16th?  
 16 A I don't know.  
 17 Q Okay. This would have been paid or reimbursed  
 18 to [REDACTED]  
 19 A Yes, sir.  
 20 Q Okay. Do you know whether it should have been  
 21 paid?  
 22 A We should have asked for more detail at least.  
 23 MR. REHWINKEL: Okay. So this would be 48,  
 24 La Teresita Invoice.  
 25 (Exhibit 48 was marked for identification.)

1 Q You would expect on the 16th they could have  
 2 power out there, right?  
 3 A Yes, sir.  
 4 Q All right. And -- okay.  
 5 MR. WAHLEN: Is your question whether any  
 6 utility lineman should ever go to a deli named  
 7 Dancing Pigs Deli or --  
 8 MR. REHWINKEL: That's embedded in the  
 9 question.  
 10 MR. WAHLEN: Just --  
 11 MR. REHWINKEL: So this is 47.  
 12 THE WITNESS: He's from [REDACTED] What can  
 13 you expect?  
 14 MR. REHWINKEL: Back on the record.  
 15 This is 47, and we'll call it Dancing Pigs  
 16 Receipt.  
 17 (Exhibit 47 was marked for identification.)  
 18 MR. WRIGHT: Charles, don't you want to call  
 19 it Dancing Pigs Bill?  
 20 MR. REHWINKEL: Well, it looks like it was  
 21 paid. There's a MasterCard number --  
 22 MR. WRIGHT: Okay.  
 23 MR. REHWINKEL: -- on it. So I'm going to  
 24 accept that it was paid.  
 25

1 BY MR. REHWINKEL:  
 2 Q All right. I think we can move out of the  
 3 food realm and go to fuel.  
 4 So page 760, this is a [REDACTED] pre-authorized  
 5 receipt in Valdosta, Georgia. I'm sure the date's on  
 6 there somewhere. Do you see the date on there?  
 7 A 9/12.  
 8 Q Okay. And it's for [REDACTED] Do you know how much  
 9 fuel this person -- do you know whether anybody bought  
 10 fuel with this?  
 11 A No, sir.  
 12 Q Okay. Is it your policy to pay for a bill --  
 13 a document like this?  
 14 A Not normally, no, we wouldn't.  
 15 Q You would really want to see a receipt that  
 16 reflected that someone actually bought fuel of a certain  
 17 amount, right?  
 18 A Yes, sir.  
 19 Q If a TECO employee submitted a receipt for  
 20 reimbursement that looked like this, it would be kicked  
 21 back and they would be asked to show what they bought  
 22 fuel-wise and --  
 23 A Yes, sir.  
 24 Q Okay.  
 25 A Explain.

1 MR. REHWINKEL: I think what I'm going to do  
 2 to try to speed things up is to hold these and do a  
 3 batch.  
 4 MR. WAHLEN: Okay.  
 5 MR. REHWINKEL: Actually, it's probably just  
 6 easier just to go ahead and call this a [REDACTED] prepay.  
 7 And are we at number 49?  
 8 MS. PONDER: 49?  
 9 MR. WAHLEN: Who just joined?  
 10 MR. MOYLE: It's Jon Moyle. I'm getting off  
 11 my office phone and putting on a cell.  
 12 MR. REHWINKEL: 49. Let's call it Valdosta,  
 13 [REDACTED] Prepay.  
 14 MS. PONDER: [REDACTED].  
 15 MR. REHWINKEL: [REDACTED] Prepay.  
 16 (Exhibit 49 was marked for identification.)  
 17 BY MR. REHWINKEL:  
 18 Q Page 761 at Ridge Manor, Florida. Do you know  
 19 where that is? It's in the TECO area, right?  
 20 A Actually, it's in the Lacooshee area.  
 21 Q But it's north of here?  
 22 A Yes.  
 23 Q And this is a receipt for [REDACTED]. It says a  
 24 prepay pump. Do you see that?  
 25 A Yes, sir.

1 MR. REHWINKEL: All right. So we'll call it  
 2 [REDACTED] Receipt, Number 51.  
 3 (Exhibit 51 was marked for identification.)  
 4 THE WITNESS: Now, what day was that, the  
 5 12th?  
 6 BY MR. REHWINKEL:  
 7 Q Yes.  
 8 A They actually could have been traveling to us  
 9 on that day because we had to divert crews off of I-75  
 10 traveling down here.  
 11 Q Okay. Because of the Santa Fe River?  
 12 A Yes.  
 13 Q All right. So that aside, I understand that  
 14 the level of detail is not what you would expect.  
 15 A Right.  
 16 Q All right.  
 17 A But them being out of our service territory on  
 18 that day could have been a normal circumstance --  
 19 Q Understand.  
 20 A -- in an unusual situation.  
 21 Q Understand.  
 22 All right. 763. I want to ask you to take a  
 23 look at that invoice and tell me if it was paid.  
 24 A It was probably paid.  
 25 Q All right. And does that have a number that's

1 Q Is this a sufficient level of detail to  
 2 substantiate this payment?  
 3 A No, sir.  
 4 Q And it would have been paid, right?  
 5 A Yes, sir.  
 6 MR. REHWINKEL: All right. So we'll call it  
 7 Ridge Manor [REDACTED] Prepay, and that's Number 50? All  
 8 right.  
 9 MS. PONDER: That's Number 50, yes.  
 10 (Exhibit 50 was marked for identification.)  
 11 BY MR. REHWINKEL:  
 12 Q All right. 762. This says fuel in [REDACTED]  
 13 [REDACTED]  
 14 A Yes, sir.  
 15 Q In [REDACTED] It's not your territory,  
 16 is it?  
 17 A It's [REDACTED] territory.  
 18 Q All right. And is this fuel? How much do you  
 19 tip [REDACTED] of gas? This is not a fuel receipt, is it?  
 20 A It doesn't appear to be a fuel receipt.  
 21 Q Okay. And it doesn't say what it's for, who  
 22 it's for? This shouldn't have been paid, should it?  
 23 A No, sir.  
 24 Q Okay. But it was?  
 25 A Yes, sir.

1 circled at the bottom on the right-hand side in red?  
 2 A Yes, sir.  
 3 Q Is that a reference to a summary document  
 4 somewhere else?  
 5 A I have no idea.  
 6 Q Okay. Hand me that back and I want to staple  
 7 this to page 764, and I want to ask you to take a look  
 8 at --  
 9 MR. REHWINKEL: And I'm going to identify this  
 10 as 52, and it will be called Sunoco [REDACTED]  
 11 (Exhibit 52 was marked for identification.)  
 12 BY MR. REHWINKEL:  
 13 Q And I want you to take a look at both of those  
 14 documents and tell me if they were each paid.  
 15 A I would have to look at the reconciliation  
 16 sheet for it, but yeah, one looks like the final receipt  
 17 for the other.  
 18 Q Okay. So, just so we understand what's going  
 19 on here, there's a prepay of [REDACTED] and then a final  
 20 receipt of [REDACTED] So if you paid them both, you would  
 21 have paid [REDACTED] of fuel; is that right?  
 22 A Yes, sir.  
 23 Q All right. And if we look at all the  
 24 documents that lead up to this, they have consecutive  
 25 numbers. Wouldn't it be reasonable to assume that these



1 numbers are references to a summary of fuel  
 2 expenditures?  
 3 A Yes, sir.  
 4 Q So let me ask you to look at page 684.  
 5 MR. WAHLEN: Did you mark 763 and 764?  
 6 MR. REHWINKEL: Yes. that's 52.  
 7 MR. WAHLEN: Okay.  
 8 MR. REHWINKEL: It's the Sunoco [REDACTED]  
 9 MR. WAHLEN: Right.  
 10 BY MR. REHWINKEL:  
 11 Q So 684 through 6 -- I forget the last number  
 12 of that -- 687, I want to call that -- I'm going to have  
 13 that marked as 53, and that will be the [REDACTED] Fuel  
 14 Summary, and ask you to look at references 47 and 48 on  
 15 the left-hand side.  
 16 (Exhibit 53 was marked for identification.)  
 17 A Can I see those documents?  
 18 BY MR. REHWINKEL:  
 19 Q Yes.  
 20 A Yeah, I can see there would be a bit of  
 21 confusion. One is clearly marked Sunoco and the other  
 22 one is marked APlus.  
 23 Q But the invoice number and the authorization  
 24 number and the --  
 25 A Yeah.

1 BY MR. REHWINKEL:  
 2 Q I want to ask you to take a look at page 775,  
 3 and tell me if this is a [REDACTED] -- a document to support  
 4 payment for a [REDACTED] prepay.  
 5 A It looks like it.  
 6 Q Okay. And based on the summary document, this  
 7 has a reference of 59?  
 8 A Yes, sir.  
 9 Q Was there a [REDACTED] reimbursement for that?  
 10 A Yes, sir.  
 11 Q Okay. Now I want to hand you -- actually, let  
 12 me see 7 -- I'm going to staple these together and ask  
 13 you to look at reference 50 -- reference 60, which is  
 14 page 776. And I'd ask you to look at the ticket number,  
 15 the authorization number and the invoice number and the  
 16 pump number and tell me if those two documents don't  
 17 represent 14 -- [REDACTED] of reimbursement for a [REDACTED] fuel.  
 18 A Yes, sir, it appears that.  
 19 MR. REHWINKEL: Okay. Now, rather than -- so  
 20 this will be --  
 21 MS. PONDER: 55.  
 22 MR. REHWINKEL: -- 55, and it will be \$1,084  
 23 Fuel Invoices.  
 24 (Exhibit 55 was marked for identification.)  
 25

1 Q -- those are all the same, right?  
 2 A Right.  
 3 Q So there's no doubt at this point in time that  
 4 those -- that's [REDACTED] of fuel,  
 5 unless there was some other adjustment made?  
 6 A Right.  
 7 Q All right. You might want to hold onto 53  
 8 because we have some other invoices.  
 9 I want to turn next to page 770, and this  
 10 is -- I'm going to hand you this invoice, this document.  
 11 Now, can you tell me whether this [REDACTED] cost  
 12 was reimbursed?  
 13 A It was probably paid.  
 14 Q All right. Now, was this a prepay?  
 15 A It doesn't look like it.  
 16 Q Well, how much gas was bought here?  
 17 A It doesn't say. Well, the price per gallon  
 18 was \$2.93, one gallon. Well, okay.  
 19 Q Yeah. Would TECO have reimbursed an employee  
 20 who submitted a claim for payment with this support?  
 21 A No, sir.  
 22 MR. REHWINKEL: All right. So we're going to  
 23 make that 54 and call it [REDACTED] Prepay.  
 24 (Exhibit 54 was marked for identification.)  
 25

1 BY MR. REHWINKEL:  
 2 Q I'm going to hand you pages 777 and 778 and  
 3 ask you if the same thing didn't happen there for [REDACTED]  
 4 and [REDACTED].  
 5 A Yes, sir.  
 6 Q So [REDACTED] submitted two invoices for  
 7 [REDACTED] worth of gas or fuel, diesel fuel?  
 8 A Yes, sir.  
 9 MR. REHWINKEL: Okay. And this will be 56,  
 10 and it will be [REDACTED] invoice.  
 11 MS. PONDER: [REDACTED] Fuel Invoice?  
 12 MR. REHWINKEL: Fuel Invoice.  
 13 (Exhibit 56 was marked for identification.)  
 14 BY MR. REHWINKEL:  
 15 Q All right. These prepay and then final  
 16 receipt documents, these examples that we've gone  
 17 through, those should not have been paid in that manner;  
 18 is that right?  
 19 A Yes, sir.  
 20 Q All right. Do you have an opinion about the  
 21 way [REDACTED] submitted these costs to you, whether  
 22 they clearly numbered them as different transactions?  
 23 A It's pretty misleading, especially since they  
 24 summarized them on the sheet.  
 25 Q All right. I want to go to page 781 and I

1 want to ask you to take a look at this receipt.  
 2 Now, this appears to be a receipt for the  
 3 actual purchase of fuel, right, for [REDACTED]?  
 4 A Yes, sir.  
 5 Q Can you tell me the location and the date of  
 6 this?  
 7 A It looks like [REDACTED] on the 14th of  
 8 September.  
 9 Q All right. [REDACTED] is about a  
 10 ten-hour drive, wouldn't you say, from TECO territory  
 11 under ideal conditions?  
 12 A Yes, sir.  
 13 Q Okay. So whoever was in this vehicle wasn't  
 14 really in a position to help TECO restore service, were  
 15 they?  
 16 A No, sir, not on the 14th.  
 17 Q Let me ask you to look at the two invoices  
 18 that are Exhibit 55 and 56 and ask you to -- I know  
 19 we've, sort of, established that there was overpayment  
 20 there or an over-claim for reimbursement, but what were  
 21 the times and locations of those invoices, dates, times  
 22 and location?  
 23 A 55 is September 14th at -- I just thought I  
 24 saw a time.  
 25 MR. REHWINKEL: Can you scroll down to the

1 Q Well, I don't know. I'm just asking.  
 2 Do you know -- and where was the other one? I  
 3 asked you -- what are the dates and the times again of  
 4 these?  
 5 A Both of them are September 14th.  
 6 Q And where are the locations?  
 7 A One is [REDACTED].  
 8 Q Which is what number?  
 9 A That is 55. And 56 is in Richmond Hill,  
 10 Georgia.  
 11 Q Do you know where those places are?  
 12 A I know where [REDACTED] is.  
 13 Q That's a good way from Tampa Electric, right?  
 14 A Yes, sir.  
 15 Q Now, if they were there at 6:00 a.m., it would  
 16 be a lot different than if they were there at 8:00 p.m.,  
 17 right?  
 18 A Yes, sir.  
 19 Q It would be almost a full workday difference.  
 20 And the same with Richmond Hill. That's not  
 21 in South Georgia, is it?  
 22 A I don't know where Richmond is.  
 23 Q All right. I want to show you page 790 and  
 24 ask you the location and time of that fuel receipt.  
 25 First of all, was this paid?

1 bottom of that page? Okay.  
 2 THE WITNESS: Maybe there's no time.  
 3 BY MR. REHWINKEL:  
 4 Q All right. You see the little fold of paper  
 5 there at the bottom on the copy on 778?  
 6 A Okay.  
 7 Q Does it look like somebody covered up the  
 8 time?  
 9 A I couldn't say.  
 10 Q Okay.  
 11 A Because it doesn't have it one way or the  
 12 other in the other receipts.  
 13 Q Do you think if we -- in all the gas receipts  
 14 that we have, if we found a Love's receipt, we'd find  
 15 out where they put the time?  
 16 A Yes, sir.  
 17 Q All right. If the time was obscured on these  
 18 as well, would that be further indication of an effort  
 19 to mislead you, you meaning TECO?  
 20 A You're almost talking like corporate  
 21 conspiracy now.  
 22 Q Well --  
 23 A Because this would not only be the people at  
 24 the pump, but also the accounting people who compiled  
 25 the invoices.

1 A It was part of the invoice. It was paid.  
 2 Q All right. And what's the date?  
 3 A September 15th.  
 4 Q And where is the location?  
 5 A St. Augustine, Florida.  
 6 Q And can you tell me what time this fuel was  
 7 purchased?  
 8 A I don't see a time on it.  
 9 Q Okay. Do you know whether this is an original  
 10 receipt or not?  
 11 A No, sir.  
 12 Q Let me hand you page 757 and ask you to take a  
 13 look at that. That's a Flying J receipt, right?  
 14 A Yes.  
 15 Q You see at the bottom, does Flying J put their  
 16 time stamps at the bottom of their receipt?  
 17 A This one does.  
 18 Q Okay. Should someone who is billing time and  
 19 expenses to TECO be in St. Augustine, Florida on the  
 20 15th?  
 21 A Not to my knowledge.  
 22 Q Do you know whether document page 690 should  
 23 have been paid or not?  
 24 A It doesn't appear that it should have been.  
 25 MR. REHWINKEL: Okay. Let's make page 790 an

1 exhibit, and that will be 57?  
 2 MS. PONDER: 57?  
 3 MR. WAHLEN: 58?  
 4 MS. PONDER: I have 57 as --  
 5 MR. WAHLEN: You didn't mark 781 as 57?  
 6 MR. REHWINKEL: Oh.  
 7 MR. WRIGHT: You may have meant that.  
 8 MR. REHWINKEL: 781, we'll call that Emporia  
 9 Receipt and make that 57.  
 10 (Exhibit 57 was marked for identification.)  
 11 MR. REHWINKEL: And then page 790, we'll call  
 12 that 58 and make it St. Augustine Receipt.  
 13 MR. WRIGHT: Before we go on, Carlos, would  
 14 you please scroll to 557. That's the one he  
 15 referred to as having a time signature on it, and I  
 16 wanted to see that.  
 17 That's fine, Charles. Thank you.  
 18 (Exhibit 58 was marked for identification.)  
 19 BY MR. REHWINKEL:  
 20 Q Let me hand you page 791 and ask you -- I'm  
 21 going to actually give you 791, 792, 793, and tell me if  
 22 you can tell me the dates and times of those purchases.  
 23 A The date is September 15th. Apparently, you  
 24 can't see the time.  
 25 Q On any of them?

1 A No, sir.  
 2 Q All right. Just -- and let me hand you 795  
 3 and ask you, is the time on that one readable on that  
 4 one?  
 5 A Yes, sir.  
 6 Q All right.  
 7 A The time is 8:44 a.m.  
 8 MR. REHWINKEL: Let's do this. Let's make  
 9 page 790 through 794 one exhibit and we'll call it  
 10 St. Augustine Receipts.  
 11 BY MR. REHWINKEL:  
 12 Q If we assumed that all the receipts in  
 13 Exhibit 58 were --  
 14 MR. WRIGHT: You mean 59, Charles?  
 15 MR. REHWINKEL: Are we calling this 59?  
 16 MS. PONDER: No. It's 58. He just amended it  
 17 to include more pages.  
 18 MR. WRIGHT: You added 790. I got it.  
 19 MR. REHWINKEL: I added 790 -- I just don't  
 20 know how to staple here.  
 21 BY MR. REHWINKEL:  
 22 Q If we assume those were all purchased at  
 23 8:49 -- 8:44 in the morning on the 15th, would that have  
 24 made a difference in whether they should have been paid  
 25 or not with respect to whoever was in these vehicles

1 provided service to Tampa Electric?  
 2 A Yes, sir.  
 3 Q It would have made a difference?  
 4 A It should have, yes, sir.  
 5 Q I mean, would that have been enough time for  
 6 them to get in your territory and do some work for you?  
 7 A About three and a half hours away.  
 8 Q Okay.  
 9 A They could have probably worked the afternoon,  
 10 evening.  
 11 Q But what we don't know is whether page 790  
 12 through 793, what time these people got gas?  
 13 A No, sir.  
 14 Q Let me ask you about page 793 in Exhibit 58,  
 15 and I want to ask you how much fuel this person bought.  
 16 A It says [REDACTED], but it's a prepay.  
 17 Q Right. Would you pay this -- would your  
 18 company reimburse an employee who submitted this  
 19 documentation?  
 20 A No, sir.  
 21 Q Should this have been paid?  
 22 A No, sir.  
 23 Q At least not without more documentation?  
 24 A Correct.  
 25 Q And maybe some more information about whether

1 they were working for TECO or not?  
 2 A Correct.  
 3 Q All right. Is there a time -- on the prepay,  
 4 we don't know a time on that one. That's one that  
 5 doesn't have time on it, the [REDACTED]  
 6 A Yes, sir.  
 7 Q All right. Let's look at the [REDACTED] invoice in  
 8 that package. Isn't it true that the [REDACTED] invoice is  
 9 the same transaction as the [REDACTED] one, if you compare  
 10 transaction number, authorization number and invoice  
 11 number --  
 12 A Yes, sir.  
 13 Q -- and pump?  
 14 So this is [REDACTED] of fuel, and  
 15 they were both paid, right?  
 16 A Yes, sir, 76 and 77.  
 17 Q Now, on both of these invoices, the time was  
 18 not shown in what was submitted to you; is that right?  
 19 A Right. But, see, this is marked 77, but on  
 20 the summary sheet -- my eyes may be crossing -- I don't  
 21 see the 181. I see it on 74.  
 22 Q Right. It's the same amount, [REDACTED] for 74.  
 23 A Okay. I guess that's a four instead of a six.  
 24 Q Yes.  
 25 A All right.

1 Q So these are also not consecutively submitted.  
 2 They were sort of spaced between these in the  
 3 documentation, right?  
 4 A Yes.  
 5 Q The time was obliterated?  
 6 A Yes, sir.  
 7 Q And at a minimum, these were misleading in the  
 8 sense of they had only represented [REDACTED] worth of fuel  
 9 that the company bought, right?  
 10 A Yes, sir.  
 11 Q Not your company, but --  
 12 A [REDACTED].  
 13 Q -- [REDACTED].  
 14 All right. Is it fair to say that these  
 15 things that we've talked about here today your team  
 16 didn't catch in reviewing these documents?  
 17 A Yes, sir.  
 18 Q If you would have seen this level of detail  
 19 and noticed these, you would have questioned them, I  
 20 would assume?  
 21 A Yes, sir. I'm just surprised. But, you know,  
 22 I have good people, but we have other jobs, and so --  
 23 Q I understand, and there's a lot of  
 24 documentation here.  
 25 A So they probably relied on these summaries and

1 of November -- of September at 3:44 p.m., right?  
 2 A Yes, sir.  
 3 Q And it's a prepay for [REDACTED] right?  
 4 A Yes, sir.  
 5 Q And it's in Orlando; is that right?  
 6 A (Nods head.)  
 7 Q And it's somewhere -- 9968 Orange Avenue,  
 8 Orlando, Florida?  
 9 A 88.  
 10 Q 88?  
 11 A It's probably near the Dancing Pig.  
 12 Q Okay. I was going to ask you that.  
 13 MR. WRIGHT: I knew it was 6800 something, but  
 14 I bet you're right.  
 15 BY MR. REHWINKEL:  
 16 Q So should this invoice have been paid?  
 17 A No, sir.  
 18 Q All right. On at least two counts. It looks  
 19 like this person is not working for TECO at this time,  
 20 and there's no evidence of the fuel that was purchased;  
 21 is that right?  
 22 A Correct.  
 23 MR. REHWINKEL: Okay. So this will be 60, and  
 24 it will be Orlando [REDACTED] Prepay.  
 25 (Exhibit 60 was marked for identification.)

1 not on the receipts themselves. They should have, most  
 2 likely, done it by the receipts.  
 3 Q All right. Let me hand you back page 58 and  
 4 then ask you again to look at 757 as an examplar.  
 5 Another piece of information that is obscured, whether  
 6 intentionally or not, is whether the receipt is original  
 7 or not; is that right?  
 8 A It looks that way, yes.  
 9 Q And there's nothing that would prevent someone  
 10 from providing a duplicate receipt of these transactions  
 11 to two different utilities that they worked for; is that  
 12 right?  
 13 A No, sir. If you're going to be that  
 14 dubious --  
 15 Q Or devious you mean?  
 16 A Devious, dubious.  
 17 MR. REHWINKEL: Okay. Let's go ahead and make  
 18 757 an exhibit since we've talked about it, and  
 19 this will be 59, and let's call that Lake Park  
 20 Invoice.  
 21 (Exhibit 59 was marked for identification.)  
 22 BY MR. REHWINKEL:  
 23 Q 799 -- we're almost done here. I want to hand  
 24 you 799 and ask you some questions about it.  
 25 This is an invoice at a Circle K on the 16th

1 MR. REHWINKEL: Okay. Jeff, that's all I have  
 2 for [REDACTED], I think. Let me just double-check  
 3 here. I've got a big section to start on after  
 4 this.  
 5 MR. WAHLEN: This is a good time to take a  
 6 break?  
 7 MR. REHWINKEL: This is a good time to just  
 8 shut down a little bit early.  
 9 MR. WAHLEN: Okay. That's fine.  
 10 MR. REHWINKEL: All right. We're going to  
 11 take a break until 8:30 tomorrow morning and we'll  
 12 re-adjournd and --  
 13 MR. WAHLEN: Perfect.  
 14 MR. REHWINKEL: You'll be under oath again  
 15 when you come back tomorrow.  
 16 We can go off the record.  
 17 (The deposition adjourned at 6:42 p.m.)  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

1 CERTIFICATE OF OATH  
2 STATE OF FLORIDA )  
3 COUNTY OF HILLSBOROUGH )  
4

5  
6 I, the undersigned authority, certify that  
7 WESLEY WILLIAM CALDWELL personally appeared before me  
8 and was duly sworn.

9 WITNESS my hand and official seal this 14th  
10 day of August, 2018.  
11

12  
13  
14  
15  
16 \_\_\_\_\_  
ANN S. BEILSTEIN, RPR  
Notary Public  
State of Florida  
17 My Commission Expires 10/31/2020  
Commission No. GG 037843  
18  
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25

1 PLEASE ATTACH TO THE DEPOSITION OF WESLEY WILLIAM  
2 CALDWELL, TAKEN ON AUGUST 8, 2018, IN RE: Petition for  
3 recovery of costs associated with named tropical systems  
4 during the 2015, 2016, and 2017 hurricane seasons and  
5 replenishment of storm reserve subject to final true-up,  
6 Tampa Electric Company

7 PAGE LINE CORRECTION AND REASON THEREFOR  
8  
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12  
13  
14  
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19 I HAVE READ THE FOREGOING PAGES AND, EXCEPT FOR ANY  
20 CORRECTIONS OR AMENDMENTS INDICATED ABOVE, I HEREBY  
21 SUBSCRIBE TO THE ACCURACY OF THIS TRANSCRIPT.

22 \_\_\_\_\_  
WESLEY WILLIAM CALDWELL DATE

23 \_\_\_\_\_  
WITNESS TO SIGNATURE DATE  
24  
25

1 CERTIFICATE OF REPORTER  
2 STATE OF FLORIDA )  
3 COUNTY OF HILLSBOROUGH )  
4

5  
6 I, Ann S. Beilstein, Registered Professional  
7 Reporter, certify that I was authorized to and did  
8 stenographically report the foregoing deposition; that  
9 a review of the transcript was reserved; and that the  
10 transcript is a true record of the testimony given by  
11 the witness.

12 I further certify that I am not a relative,  
13 employee, attorney, or counsel of any of the parties,  
14 nor am I a relative or employee of any of the parties'  
15 attorneys or counsel connected with the action, nor am  
16 I financially interested in the action.

17 Dated this 14th day of August, 2018.  
18  
19  
20

21 \_\_\_\_\_  
Ann S. Beilstein, RPR  
22  
23  
24  
25

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Re: Petition for recovery of : DOCKET NO. 20170271-EI
costs associated with named :
tropical systems during the : FILED: August 2, 2018
2015, 2016, and 2017 hurricane :
seasons and replenishment of :
storm reserve subject to final :
true-up, Tampa Electric Company.:

CONFIDENTIAL DEPOSITION DUCES TECUM
VOLUME II

CONTINUED
DEPOSITION OF: WESLEY WILLIAM CALDWELL

DATE: August 9, 2018
TIME: 8:40 a.m. to 11:40 a.m.

PLACE: TECO Plaza
702 North Franklin Street
6th Floor Regulatory Conference Room
Tampa, FL 33602
REPORTED BY: ANN S. BEILSTEIN, RPR
Notary Public
State of Florida at Large

Pages 272 - 385

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7 MARK ROCHE
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10 JOHANA NIEVES
11 BART FLETCHER
12 CURT MOURING

13 INDEX

14 PAGE

15 CONTINUED REDIRECT EXAMINATION BY MR. REHWINKEL..... 276
16 CROSS-EXAMINATION BY MR. SCHRADER..... 379
17 CROSS-EXAMINATION BY MR. WHALEN..... 380
18 CERTIFICATE OF OATH..... 383
19 CERTIFICATE OF REPORTER..... 384
20 ERRATA SHEET..... 385

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1 EXHIBITS
2 DESCRIPTION

3 FOR THE OFFICE OF PUBLIC COUNSEL: PAGE
4 61 - Late-Filed - Mutual Assistance Agreement
5 with TECO..... 281
6 62 - Cash Prepay..... 285
7 63 - Page 1006..... 287
8 64 - Page 1014..... 288
9 65 - Page 1015..... 289
10 66 - Page 1018..... 291
11 67 - Page 1021..... 293
12 68 - Composite Fuel Receipts.... 300
13 69 - J Documentation..... 303
14 70 - Page 998..... 304
15 71 - Page 1032..... 307
16 72 - Receipts..... 312
17 73 - Fuel Receipt..... 313
18 74 - Late-Filed - 1353-1354 Reconciliation
19 to Invoice..... 316
20 75 - Late-Filed - Supporting
21 Documentation..... 319
22 76 - Late-Filed - Miscellaneous Equipment.. 321
23 77 - Provisioning Invoice..... 326
24 78 - Identify Exhibit 77 invoice, which company
25 that's for:
26 ..... 326
27 79 - Late-Filed - Did work for ..... 329
28 80 - Timesheets..... 330
29 81 - Timesheets..... 336
30 82 - Wiper Blades..... 337
31 83 - O'Reilly Auto Parts..... 339
32 84 - Invoices..... 342
33 85 - Crew Documentation..... 347
34 86 - Miscellaneous Expense Summary for ..... 347
35 87 - Crew..... 355
36 88 - Miscellaneous Expenses..... 369
37 89 - Late-Filed - Management Labor
38 Cost Summary..... 375
39 90 - Timesheet..... 376

1 MR. REHWINKEL: We'll go on the record.  
 2 Those in the office in Tallahassee, identify  
 3 yourself, please.  
 4 MR. BEASLEY: This is Jim Beasley, along with  
 5 Kurt Schrader, Johana Nieves, Bart Fletcher and  
 6 Curt Mouring, all of those with the Public Service  
 7 Commission here in Tallahassee.  
 8 MR. REHWINKEL: Good morning.  
 9 MR. MOYLE: Good morning. Jon Moyle in  
 10 Tallahassee as well.  
 11 MS. CHRISTENSEN: Patty Christensen with OPC.  
 12 MR. REHWINKEL: Is anyone else on? Okay.  
 13 The same people are here today, except  
 14 Beth Young is out of the room for now.  
 15 Jeff Chronister is in the room and Mark Roche is in  
 16 the room as well.  
 17 All right. Are we ready to go?  
 18 WESLEY WILLIAM CALDWELL,  
 19 the witness herein, being previously duly sworn on oath,  
 20 continued to be examined and deposed as follows:  
 21 CONTINUED REDIRECT EXAMINATION  
 22 BY MR. REHWINKEL:  
 23 Q Good morning, Mr. Caldwell.  
 24 A Good morning, sir.  
 25 Q And I think, for the record, you're still

1 Q When you say "those documents," you mean --  
 2 A That invoice.  
 3 Q The [REDACTED] invoice?  
 4 A Right. I would have to -- I know that we  
 5 forwarded it, but I'm not sure the level of detail that  
 6 we received it.  
 7 Q Okay. Well, I'm going to ask you some  
 8 questions about it today and see if you can answer them.  
 9 A Okay.  
 10 Q Okay. Do you know from your work on the storm  
 11 Irma whether [REDACTED] billed on the same basis or provided  
 12 services under the general SEE mutual assistance?  
 13 A No, sir.  
 14 Q You don't know if they did or --  
 15 A Well --  
 16 Q -- they didn't?  
 17 A They're technically not a member of it. Only  
 18 Tampa Electric is.  
 19 Q Okay.  
 20 A So they wouldn't have been bound by those  
 21 guidelines.  
 22 Q Okay. Did anyone on your team review [REDACTED]  
 23 fuel receipts?  
 24 A Can we possibly go off line and let me check a  
 25 file?

1 under oath --  
 2 A Yes, sir.  
 3 Q -- from yesterday.  
 4 I want to ask you about some invoices and  
 5 receipts from [REDACTED]a. Did you review those?  
 6 A Someone on my team did.  
 7 Q Okay. So the first -- let me just ask you a  
 8 couple of questions. [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 Q Okay. So the companies that provided  
 12 assistance in the storm were [REDACTED]  
 13 A Yes, sir.  
 14 Q [REDACTED]  
 15 A Yes, sir.  
 16 Q And some contractors and subcontractors of  
 17 those entities?  
 18 A Yes, sir.  
 19 Q Okay. But is it the case that any [REDACTED]  
 20 services or contractor or subcontractor services were  
 21 all billed under a single [REDACTED] invoice?  
 22 A I'm -- you know, I don't recall ever seeing  
 23 that, so I'm not sure that we actually reviewed those  
 24 documents. I would have to go back and check a file to  
 25 see.

1 Q Yes, that's acceptable.  
 2 MR. REHWINKEL: We're off the record.  
 3 (Pause in proceedings.)  
 4 MR. REHWINKEL: Okay. So back on the record.  
 5 BY MR. REHWINKEL:  
 6 Q I think the question I asked you is if anyone  
 7 on your team reviewed [REDACTED] fuel receipts.  
 8 A Which one of those three companies are you  
 9 asking about?  
 10 Q Well, I would ask about [REDACTED],  
 11 [REDACTED]  
 12 A We only received receipts from what was called  
 13 the [REDACTED] --  
 14 Q [REDACTED]  
 15 A -- [REDACTED].  
 16 Q Okay.  
 17 A We only received summaries from [REDACTED]  
 18 and [REDACTED]. We didn't have any receipts that  
 19 was supposedly done by someone else.  
 20 Q Someone else in [REDACTED]  
 21 A I'm not sure. [REDACTED] or Tampa Electric.  
 22 Q Okay. Well, I want to take you through some  
 23 receipts that I have that were provided and see if those  
 24 are the ones that you-all --  
 25 So the first -- well, before we do that, let

1 me ask you a couple of follow-up questions.  
 2 [REDACTED] is not a member of SEE, are they?  
 3 A No, sir.  
 4 Q Are they a member of any mutual assistance  
 5 group?  
 6 A I do not know.  
 7 Q Okay. Do you know whether they have  
 8 guidelines that they follow?  
 9 A I do not know.  
 10 Q Okay. Were you given any standards or  
 11 guidelines with which to review any [REDACTED] invoices for  
 12 storm work?  
 13 A No, sir.  
 14 Q Okay. Do you know whether there's an  
 15 [REDACTED]  
 16 [REDACTED]  
 17 A I don't know.  
 18 MR. REHWINKEL: Okay. Can we go off the  
 19 record for a second, and I would like to talk to  
 20 Jeff and Carlos outside the room.  
 21 (Discussion off the record.)  
 22 MR. REHWINKEL: What I would like to do as a  
 23 late-filed exhibit, after making sure I was  
 24 following a protocol that I had agreed to a while  
 25 back, is to ask you for a late-filed deposition

1 invoice.  
 2 A I would have to check the file, but yes, it  
 3 looks like it is.  
 4 Q All right. Would this receipt have been paid?  
 5 A Yes, sir.  
 6 Q And was there any reason that the fact that  
 7 it's a cash receipt for fuel, was there any issue with  
 8 that?  
 9 A No, sir.  
 10 Q Do you know why a utility would pay cash for  
 11 fuel?  
 12 A If they were -- since this was a contractor,  
 13 if they were possibly afraid that a credit card wouldn't  
 14 be accepted in the United States, they could have  
 15 brought cash.  
 16 Q Okay.  
 17 A And we travel with cash sometimes.  
 18 Q All right. Does Tampa Electric reimburse its  
 19 employees when they provide cash receipts for fuel?  
 20 A Yes, sir.  
 21 Q All right. Let me ask you about 1005. Would  
 22 these receipts have been paid?  
 23 A Most likely, yes, sir.  
 24 Q Okay. Now, there's a [REDACTED] receipt on the  
 25 left-hand side and it says it's a cash receipt in

1 exhibit -- and what number are we on?  
 2 MS. PONDER: 61.  
 3 MR. REHWINKEL: [REDACTED]  
 4 [REDACTED]  
 5 [REDACTED]  
 6 [REDACTED]  
 7 [REDACTED]  
 8 BY MR. REHWINKEL:  
 9 Q Do you understand what I'm asking?  
 10 A Yes, sir.  
 11 MR. REHWINKEL: Okay. And we'll just give it  
 12 a short title of [REDACTED]  
 13 [REDACTED]. And to the extent such a thing exists,  
 14 that's what I'm asking for.  
 15 (Exhibit 61 to be marked and produced as a  
 16 late-filed exhibit.)  
 17 BY MR. REHWINKEL:  
 18 Q Okay. So the first thing I want to ask you to  
 19 turn to is document 1002 in the 76 original.  
 20 MR. TOCHE: What is the number, Charles?  
 21 MR. REHWINKEL: 1002.  
 22 MR. WAHLEN: In the original.  
 23 BY MR. REHWINKEL:  
 24 Q I want to hand you this document, which is the  
 25 one on the screen, and ask you if that's an [REDACTED] fuel

1 [REDACTED] Do you see that?  
 2 A Yes, sir.  
 3 Q And it says it's prepaid.  
 4 A Right.  
 5 Q Would the fact that it's cash and a prepay  
 6 cause you concern?  
 7 A I would have liked to have seen a final  
 8 receipt.  
 9 Q Can you tell how much fuel was pumped?  
 10 A No, sir.  
 11 Q Okay. What would have prevented the person  
 12 that received this receipt from going in, giving the  
 13 clerk [REDACTED] for a prepayment and going out and pumping [REDACTED]  
 14 and coming back in and getting [REDACTED] back, hypothetically?  
 15 A Hypothetically, only their own personal  
 16 ethics.  
 17 Q Okay. Let's look at the next receipt there in  
 18 [REDACTED] It's a prepaid. The  
 19 same question: That would have been -- both of these  
 20 would have been paid, right?  
 21 A Yes, sir.  
 22 Q Do you think they should have been paid with  
 23 this documentation?  
 24 A No, sir.  
 25 Q Okay. And by the time someone from



1 [REDACTED],  
 2 [REDACTED], they're pretty far into the trip, right?  
 3 A Yes, sir.  
 4 Q And you wouldn't have received any  
 5 documentation that said there was a problem with credit  
 6 cards with [REDACTED]?  
 7 A No, sir.  
 8 Q Let's scroll up a little bit and look at  
 9 the -- I mean down. Sorry. And look at the third --  
 10 okay. We see another [REDACTED] receipt on the 12th in  
 11 Altamonte Springs for [REDACTED]. It's a prepay. Should that  
 12 have been paid?  
 13 A No, sir. It should have been a final receipt.  
 14 Q Now, the fourth receipt on this page is [REDACTED]  
 15 fuel sale that shows gallons and price. Do you see  
 16 that?  
 17 A Yes, sir.  
 18 Q And this is a proper receipt in that it shows  
 19 a complete transaction and it's paid, right?  
 20 A Yes, sir.  
 21 Q And it's with a credit card, right?  
 22 A Yes, sir.  
 23 MR. REHWINKEL: Okay. I would like to make  
 24 this an Exhibit 62.  
 25 MS. PONDER: Yes, 62.

1 Q Okay. Now, is there a -- when I say "this  
 2 receipt," there's a [REDACTED] receipt and it looks like  
 3 truck 31093 and it says prepaid receipt, cash [REDACTED]  
 4 total [REDACTED], change [REDACTED]. Do you see that?  
 5 A The 31093?  
 6 Q Yes, sir?  
 7 A That was a prepaid cash.  
 8 Q Yes. But it shows a net transaction of [REDACTED]?  
 9 A Right.  
 10 Q And is [REDACTED] what would have been paid there?  
 11 A Yes, sir.  
 12 Q Okay. So let's look at the other two receipts  
 13 there. So in [REDACTED] there's a [REDACTED] prepaid receipt  
 14 with no other information about sale on there, is that  
 15 right, in [REDACTED]?  
 16 A Yes, sir.  
 17 Q [REDACTED]?  
 18 A Right.  
 19 Q And this is at -- on September 8th at  
 20 21:21:51, which looks like -- what's that, 9:51?  
 21 A Yes.  
 22 Q 9:21 p.m.?  
 23 A Yes, sir.  
 24 Q Let me see it for a second. And should that  
 25 [REDACTED] prepaid receipt have been reimbursed?

1 MR. REHWINKEL: This is 1005, and it will be  
 2 [REDACTED] Cash Prepay.  
 3 (Exhibit 62 was marked for identification.)  
 4 BY MR. REHWINKEL:  
 5 Q For the receipts on Exhibit 62, you do not see  
 6 any evidence that fuel was received for the [REDACTED] that  
 7 was reimbursed, do you?  
 8 A No, sir.  
 9 Q And for the purchase in Altamonte Springs, is  
 10 there any indication of what truck received the fuel?  
 11 A No, sir.  
 12 Q If you look at the two receipts, the one in  
 13 [REDACTED] and [REDACTED], is there a  
 14 truck number indicated on those?  
 15 A I don't see one.  
 16 Q So the handwritten notations up there?  
 17 A Oh, 52014 and 41017.  
 18 Q Okay. And there are no such notations on the  
 19 cash receipt in Altamonte Springs?  
 20 A No, sir.  
 21 Q Okay. All right. Let's look at page 1006,  
 22 and let me hand you that and ask you if this receipt  
 23 would have been paid for [REDACTED].  
 24 A It was, most likely, paid, but it's not a  
 25 final receipt.

1 A No, sir. We should have made sure it was a  
 2 final receipt.  
 3 MR. REHWINKEL: Okay. So this will be 63, and  
 4 it will be -- I'm just going to call it Page 1006.  
 5 (Exhibit 63 was marked for identification.)  
 6 BY MR. REHWINKEL:  
 7 Q All right. 1014. 1014. All right. Let me  
 8 hand you page 1014 and I want to ask you about a [REDACTED]  
 9 prepay receipt there. This is in [REDACTED]  
 10 [REDACTED], correct?  
 11 A Yes, sir.  
 12 Q And on September 11th. And it's for -- it's  
 13 at pump 20 and it's for [REDACTED], and it doesn't show how  
 14 much gas was purchased, does it?  
 15 A No, sir.  
 16 Q Was this receipt paid?  
 17 A Yes, sir, I'm sure it was.  
 18 Q And should it have been?  
 19 A We would have -- should have received a final  
 20 receipt for it.  
 21 Q Okay. Can you tell what time that was on the  
 22 11th?  
 23 A 15:27. That would have been 3:27 in the  
 24 afternoon.  
 25 Q Okay. So on this receipt the time was not

1 blocked?  
 2 A No, sir.  
 3 MR. REHWINKEL: Okay. This will be 64 and it  
 4 will -- we'll just call it Page 1014.  
 5 (Exhibit 64 was marked for identification.)  
 6 BY MR. REHWINKEL:  
 7 Q Now, I want to go to page 1015. And I'm going  
 8 to hand you these two receipts and I want to ask you  
 9 about this transaction.  
 10 On the left is a [REDACTED] purchase of fuel for --  
 11 and it's -- this is a completed transaction, right, at  
 12 pump 19, [REDACTED] gallons at [REDACTED] cents a gallon?  
 13 A Yes, sir.  
 14 Q And it's on September 11th, [REDACTED],  
 15 [REDACTED] Flying J, right?  
 16 A Yes, sir.  
 17 Q And you see the MasterCard, the last four  
 18 digits, 5660, right where it says "swiped" --  
 19 A Yes, sir.  
 20 Q -- above the bar code?  
 21 If you look at Exhibit 64, do you see the  
 22 [REDACTED] receipt there that has the same last four  
 23 digits on the MasterCard?  
 24 A Yes, sir.  
 25 Q Okay. So you would assume this is the same --

1 A Yes, sir.  
 2 Q And if we look at the last four of the credit  
 3 card, it's 1264 on each, right?  
 4 A Yes, sir.  
 5 Q The authorization number is 073556 on both,  
 6 right?  
 7 A Yes, sir.  
 8 Q And the invoice number is 218197 on both,  
 9 right?  
 10 A Yes, sir.  
 11 Q Does this appear to be a [REDACTED] transaction  
 12 for [REDACTED] worth of gas?  
 13 A It appears, but the one on the right is marked  
 14 pre something and the one on the left has a truck  
 15 number. So I would have to go back to the summary  
 16 invoice to make sure that this was actually on the  
 17 invoice.  
 18 Q Okay. Do you have that with you?  
 19 A We have it somewhere here, but --  
 20 Q Okay. I didn't see a summary for the [REDACTED]  
 21 [REDACTED] fuel in what was provided to us. So  
 22 that's why I'm asking if you have something.  
 23 A It would be in the file.  
 24 Q All right.  
 25 A I have to look, but I think you should have

1 the person with this particular credit card, right?  
 2 A Yes, sir.  
 3 Q Now, let's look at the next transaction. It's  
 4 at pump 20 and it's for [REDACTED] and it's a completed  
 5 transaction, but it's a debit card.  
 6 Is there anything about that that that would be of  
 7 concern to you? It looks like it's at a different pump.  
 8 They're ten seconds apart. Is it just --  
 9 A I see two vehicles fueling at the same time.  
 10 Q All right. So should the -- and so both of  
 11 these receipts were paid, and there's nothing indicating  
 12 on the face that they shouldn't have been paid, right?  
 13 A No, sir.  
 14 MR. REHWINKEL: Okay. We'll make this 65, and  
 15 it will be -- we'll just call it Page 1015.  
 16 (Exhibit 65 was marked for identification.)  
 17 BY MR. REHWINKEL:  
 18 Q All right. 1018. I'll hand you that receipt  
 19 or that page. On the right -- this is a transaction in  
 20 [REDACTED]; is that right?  
 21 A Yes, sir.  
 22 Q On the right we see a pre-authorized receipt  
 23 for [REDACTED] at -- it says Prepay CR number 4, and then on  
 24 the left it says Unleaded CR 4 -- 04 and it's for  
 25 [REDACTED]; is that right?

1 been provided everything. So we may not have that  
 2 either.  
 3 Q Well --  
 4 A In that case, we would have probably paid  
 5 [REDACTED].  
 6 Q For [REDACTED] in fuel?  
 7 A Yes.  
 8 MR. REHWINKEL: This will be 66, and it will  
 9 be 1018.  
 10 (Exhibit 66 was marked for identification.)  
 11 BY MR. REHWINKEL:  
 12 Q All right. Let's look at 1021, please. I'll  
 13 hand you this. Turn to 1021.  
 14 All right. I want to see if we can get the  
 15 truck numbers and as much of the receipt as possible.  
 16 So on this page, we see a transaction with a 200 on the  
 17 left, a [REDACTED] prepay, and on the right a [REDACTED] final  
 18 receipt; is that right?  
 19 A Yes, sir.  
 20 Q And they're both at the Pilot station in  
 21 [REDACTED]; is that right?  
 22 A Yes, sir.  
 23 Q Now, what we see on the left side is  
 24 transaction number 1688767, and on the right,  
 25 transaction number 1688767. Those are the same numbers,

1 right?  
 2 A Yes, sir.  
 3 Q And we look at the last four, 1264 and 1264  
 4 are the credit card, right?  
 5 A Yes, sir.  
 6 Q And authorization numbers are identical,  
 7 130633?  
 8 A Yes, sir.  
 9 Q And we see a signature, [REDACTED]  
 10 [REDACTED]?  
 11 A Yes, sir.  
 12 MR. REHWINKEL: Okay. Can you scroll up so we  
 13 can look on the screen?  
 14 BY MR. REHWINKEL:  
 15 Q All right. Is there a time on this screen?  
 16 A No, sir.  
 17 Q Look at the -- on the left-hand side under the  
 18 bar code, do you see a little line under the 6 and the  
 19 1?  
 20 A Yes, sir.  
 21 Q Does it look like somebody might have blocked  
 22 off the time on this one?  
 23 A It's possible.  
 24 Q And that's the same 1264 last four that we saw  
 25 on Exhibit 66; is that right?

1 you look at the bottom, the prepay receipt is an  
 2 original and the final receipt is a copy; is that right?  
 3 Is that --  
 4 A Yes, sir.  
 5 Q Does that cause concern to you?  
 6 A I don't know the procedures for these.  
 7 Q Okay. Let's look at Exhibit 65.  
 8 A It says "original" --  
 9 Q That's Flying J, though, and this is Pilot,  
 10 but they have "original" on both the prepay and the  
 11 final, right?  
 12 A Yes, sir.  
 13 Q Okay. I want to look at page 1024. This  
 14 is -- okay. On the left we see a Pilot receipt in  
 15 [REDACTED]. 168770 is the transaction  
 16 number. Do you see that?  
 17 A Yes, sir.  
 18 Q And it's for [REDACTED] and it's signed by  
 19 somebody. I'm going to represent to you that that's  
 20 [REDACTED], but we'll be able to look at that later.  
 21 But there's a signature on there, right?  
 22 A Yes, sir.  
 23 Q And we scroll a little bit further down. It  
 24 says it's a copy of a prepay and there's no time on it;  
 25 is that right?

1 A Yes, sir, the credit card number.  
 2 Q Okay. Thank you.  
 3 Does this look like a transaction that the  
 4 company TECO paid [REDACTED] for  
 5 [REDACTED] worth of fuel?  
 6 A Apparently, yes, sir.  
 7 MR. REHWINKEL: Okay. This will be 67, and  
 8 we'll call it --  
 9 BY MR. REHWINKEL:  
 10 Q Oh, one other question about this one. Let's  
 11 go back up on the screen to -- so it looks like someone  
 12 has said for the [REDACTED] prepay that truck 41018 and truck  
 13 51034 got that fuel, and other than the right truck  
 14 51020 got the [REDACTED] in fuel, right?  
 15 A Yes, sir, it does.  
 16 Q Now, if it's true that the prepay was just a  
 17 hold and the 112 is the actual purchase, whoever put  
 18 those truck numbers and associated them with [REDACTED] worth  
 19 of fuel is, pretty much, lying, aren't they?  
 20 A Yes, sir.  
 21 MR. REHWINKEL: Okay. So this will be 67, and  
 22 it will be called 1021, Page 1021.  
 23 (Exhibit 67 was marked for identification.)  
 24 BY MR. REHWINKEL:  
 25 Q Let me ask you one more question about 67. If

1 A There's no time, but this receipt I don't see  
 2 prepay on.  
 3 Q I'm sorry. It's a copy. I apologize. So  
 4 this is just -- this is a final receipt.  
 5 Now, on the right we have -- in a different  
 6 town. This is in [REDACTED] prepay and  
 7 it's on -- what's the date on that one?  
 8 A September 9th.  
 9 Q And it has the time on it?  
 10 A Yes, sir.  
 11 Q Now, the last four on these two cards is the  
 12 same, 1288; is that right?  
 13 A Yes, sir.  
 14 Q All right. I'm going to set this aside for a  
 15 second. I want to ask you to go to page 1025. Take a  
 16 look at that.  
 17 Now, here we see in [REDACTED] on  
 18 the left a [REDACTED] purchase. 1288 is the card. And that  
 19 is a transaction that would have been paid, and that's,  
 20 it looks like, a final transaction, right?  
 21 A Yes, sir.  
 22 MR. REHWINKEL: Can you scroll down a little  
 23 bit on that?  
 24 BY MR. REHWINKEL:  
 25 Q Okay. All right. Now, let's go look at the

1 other side of the page at the Pilot in [REDACTED]  
 2 [REDACTED] This is a prepay, right, for [REDACTED]?  
 3 A Yes, sir.  
 4 Q Now, we see that same signature there that I'm  
 5 representing is [REDACTED]. It looks  
 6 like it could be [REDACTED], right? But it's something  
 7 like that, right?  
 8 A Yes, sir.  
 9 Q All right. Now, this is a [REDACTED] prepay. This  
 10 would have been paid, right, at [REDACTED]?  
 11 A Yes, sir.  
 12 Q It shouldn't have been paid, right?  
 13 A No, sir. It should have been a final receipt.  
 14 Q Okay. Now, let's look at the transaction  
 15 number. What is that, 1688757?  
 16 A Yes, sir.  
 17 Q Let me show you -- let me see this for a  
 18 second.  
 19 I'm going to hand you page 1026 and ask you to  
 20 take a look at that. On the right we see a prepay of  
 21 [REDACTED]. The last four is 1288 at [REDACTED].  
 22 And what is the date on that one?  
 23 A September 9th.  
 24 Q Okay. And then on the left, we see a prepay  
 25 of [REDACTED] -- I mean a final receipt of [REDACTED] at the

1 Q Okay. So what we see there is payment -- and  
 2 both of those receipts would have been paid, right?  
 3 A Yes, sir.  
 4 Q They were submitted several receipts apart in  
 5 the documentation, right?  
 6 A Yes, sir.  
 7 Q [REDACTED] paid for [REDACTED] of fuel?  
 8 A Yes, sir.  
 9 Q The same credit card number 1288?  
 10 A Yes, sir.  
 11 Q All right. Let me show you page 1024. We can  
 12 set those aside for a second. I think I'm going to  
 13 combine all of these in one big exhibit.  
 14 Page 1024, you see receipt of prepay for [REDACTED]?  
 15 A Yes, sir.  
 16 Q The last four is 1288?  
 17 A Yes, sir.  
 18 Q Now, let's look at 1033. Let me hand you  
 19 that. You see a receipt for [REDACTED]?  
 20 A Yes, sir.  
 21 Q The last four is 1288?  
 22 A Yes, sir.  
 23 Q Authorization is 92735?  
 24 A Yes, sir.  
 25 Q All right. And when we go back and look at

1 same station in [REDACTED]; is that right?  
 2 A Yes, sir.  
 3 Q The last four are 1288?  
 4 A Yes, sir.  
 5 Q All right.  
 6 A These look like different transactions.  
 7 Q Yes. I want to -- give me one second here.  
 8 Let's look at page 1028. I'll hand you that.  
 9 And keep with you -- do you have 1026 with you?  
 10 A Yes, sir.  
 11 Q Okay. Let's look at 1028. So on the left we  
 12 see in [REDACTED], a [REDACTED]  
 13 prepay on pump 1. Do you see that?  
 14 A Yes, sir.  
 15 Q The last four is 1288?  
 16 A Yes, sir.  
 17 Q Authorization number 092706?  
 18 A Yes, sir.  
 19 Q Invoice 169278?  
 20 A I see that on the 1028.  
 21 Q 1028? You mean 1288? Oh, page 1 -- all  
 22 right. So look at, on page 1026, the [REDACTED] receipt.  
 23 A Yes, sir.  
 24 Q Isn't that same information on that one?  
 25 A Yes, sir.

1 the -- on page 1024, the [REDACTED] prepay, we see the same  
 2 identifying markers on that, right?  
 3 A Yes, sir.  
 4 Q And we see the same signature associated with  
 5 card 1288 on there?  
 6 A Yes, sir.  
 7 Q All right. Now, let's look again at 1025. We  
 8 can set those two pages aside for a second here.  
 9 Page 1025, do you see a [REDACTED] receipt?  
 10 A Yes, sir.  
 11 Q The last four is 1288?  
 12 A Yes, sir.  
 13 Q Authorization is 92803?  
 14 A Yes, sir.  
 15 Q And let's look at page 1026. Do you see a  
 16 receipt for [REDACTED] prepay?  
 17 A Yes, sir.  
 18 Q The last four is 1288?  
 19 A Yes, sir.  
 20 Q 92803 is the --  
 21 A Authorization.  
 22 Q Authorization?  
 23 A Yes, sir.  
 24 Q All right. Let me do this. I want to --  
 25 A These are marked with different vehicle

1 numbers.  
 2 Q Yes, sir. But the pump information is the  
 3 same?  
 4 A Yes, sir.  
 5 Q Let's take a second. I want to make these all  
 6 in one exhibit and then ask you some final questions  
 7 about this series.  
 8 MR. WAHLEN: That was what, 1021?  
 9 MR. REHWINKEL: We're going to put -- what I'm  
 10 going to do -- let me see. I'm going to make an  
 11 exhibit with 1024, 1025, 1026, 1028 and 1033  
 12 together.  
 13 MR. WAHLEN: What about 1021, Charles?  
 14 MS. PONDER: That was 67.  
 15 MR. REHWINKEL: All right. So this will be 68  
 16 and --  
 17 MR. WAHLEN: And that's 1024 through 1026,  
 18 1028 and 1033?  
 19 MR. REHWINKEL: That's right. All right. And  
 20 these -- we'll call it a composite, [REDACTED]  
 21 [REDACTED] Fuel Receipts. We'll just -- I'm sorry.  
 22 That will just be a composite, [REDACTED] Fuel  
 23 Receipts.  
 24 (Exhibit 68 was marked for identification.)  
 25

1 A No, sir.  
 2 Q All right. I want to ask you to take a look  
 3 at page 1027. Do you see the receipt in the upper  
 4 right-hand corner, and it says card name [REDACTED]  
 5 and it has the 1288 last four on it?  
 6 A Yes, sir.  
 7 Q Okay. Do you know who [REDACTED] is?  
 8 A No, sir.  
 9 Q I want to hand you 1344. And I can give you  
 10 documents in front of that if you need for context, but  
 11 it says [REDACTED]. It's a hotel bill,  
 12 right?  
 13 A Yes, sir.  
 14 Q Do you see the first -- the first name?  
 15 A Yes, sir.  
 16 Q What does it say there? Can you read that?  
 17 A Routed from [REDACTED] (Fleet Superintendent)  
 18 [REDACTED] of Room Number 2 something.  
 19 Q Does that seem to indicate that [REDACTED]  
 20 is a fleet superintendent for [REDACTED]?  
 21 A Or some subcontractor to them.  
 22 Q Okay. But he's a superintendent of some kind  
 23 of fleet, right?  
 24 A Yes, sir.  
 25 Q That would imply that this person has some

1 BY MR. REHWINKEL:  
 2 Q Okay. So what it looks like to me is that  
 3 somebody with card 1288 has submitted three [REDACTED] prepays  
 4 for reimbursement and purchased fuel in the amount that  
 5 totals [REDACTED]. Does that look like  
 6 it to you?  
 7 A Yes, sir.  
 8 Q There looks like kind of a pattern here,  
 9 doesn't there?  
 10 A Yes, sir.  
 11 Q The prepay amount is [REDACTED] and then something  
 12 just a little bit below [REDACTED] is the actual transaction.  
 13 A Yes, sir.  
 14 Q And in some cases, they assign trucks to what  
 15 I'll call the phantom receipt of the prepay. Would you  
 16 agree with that?  
 17 A Yes, sir.  
 18 Q All right. Now, if these are credit card  
 19 transactions, at least at some level, the difference  
 20 between the phantom reimbursement and the actual charge  
 21 is -- it goes somewhere, and assumingly it would be a  
 22 credit back on the credit card inside the store, right?  
 23 A Yes, sir.  
 24 Q But we don't know how that credit was  
 25 provided, right?

1 supervision or management oversight of the vehicle fleet  
 2 of some crews, right?  
 3 A Yes, sir.  
 4 Q And this person also has documentation  
 5 connecting him with receipts that do not appear to be  
 6 honest; is that right?  
 7 A It appears that way, yes, sir.  
 8 Q Okay. Would that concern you?  
 9 A Yes, sir.  
 10 MR. REHWINKEL: I'm going to put 1027 and 1344  
 11 together as an Exhibit 69, and we'll just call it  
 12 [REDACTED] Documentation.  
 13 (Exhibit 69 was marked for identification.)  
 14 BY MR. REHWINKEL:  
 15 Q Let's look at 1028, which is in Exhibit 68.  
 16 Actually, strike that question.  
 17 I want to go back and look at page 998, if we  
 18 can. I'm going to hand you this and let me ask you if  
 19 these two receipts totaling [REDACTED] were paid.  
 20 A Yes, sir, most likely they were.  
 21 Q So on the left we see a pre-authorized receipt  
 22 in the amount of [REDACTED] at pump 5. Do you see that?  
 23 A Yes, sir.  
 24 Q And on the right, a final transaction of [REDACTED]  
 25 on pump 5. Do you see that?

1 A Yes, sir.  
 2 Q When we look at the last four of the  
 3 MasterCard, it's 2356 on both, right?  
 4 A Yes, sir.  
 5 Q Authorization code 102604 are the same?  
 6 A Yes, sir.  
 7 Q As is the -- whatever the Stan is, right?  
 8 A Yes, sir.  
 9 Q No, wait, those are different. I apologize.  
 10 The invoice numbers are different -- are the same.  
 11 725713 is the same on both?  
 12 A Yes, sir.  
 13 Q Does that appear to be [REDACTED] for [REDACTED] worth of  
 14 fuel?  
 15 A Yes, sir, it does.  
 16 Q Okay. Only the [REDACTED] would have been  
 17 reimbursable, right?  
 18 A Yes, sir.  
 19 MR. REHWINKEL: Okay. We'll make this  
 20 Exhibit 69.  
 21 MS. PONDER: 70.  
 22 MR. REHWINKEL: Oh, 70. I apologize.  
 23 MR. WRIGHT: Charles, the page is?  
 24 MR. REHWINKEL: 998.  
 25 (Exhibit 70 was marked for identification.)

1 A Yes, sir.  
 2 Q Final receipt. And it's got 10288 on it. The  
 3 transaction number is 1638757, right?  
 4 A Yes, sir.  
 5 Q All right. So I want to give you 68 and ask  
 6 you to look at page 1025 and ask you if there's a \$ [REDACTED]  
 7 prepay there with the same information that's on the  
 8 [REDACTED] final purchase.  
 9 A Yes, sir.  
 10 Q So we see, assumingly, [REDACTED], 1288.  
 11 1688757 is the transaction number. Authorization is  
 12 130010?  
 13 A Yes, sir.  
 14 Q It's [REDACTED] in gas, right?  
 15 A Yes, right.  
 16 Q Or diesel?  
 17 A Yes, sir.  
 18 Q So that transaction doesn't look right, does  
 19 it?  
 20 A No, sir.  
 21 Q Now, look at the -- we just talked about the  
 22 [REDACTED] prepay on 1032 with the transaction number of  
 23 1688770.  
 24 A Yes, sir.  
 25 Q And then if we look at page 1024, we see a

1 BY MR. REHWINKEL:  
 2 Q 1032 is what I want to look at now. Let me  
 3 hand you 1032. Would these receipts have been paid?  
 4 A Yes, sir, most likely they would have.  
 5 Q Okay. Now, hold that and let me hand you  
 6 1033. I've already done 1033.  
 7 MR. WAHLEN: It's part of 68.  
 8 MR. REHWINKEL: Yeah.  
 9 BY MR. REHWINKEL:  
 10 Q I apologize. Let me -- I've got my numbers  
 11 mixed up here. Hold on to 1032, but I want to ask you  
 12 to look at 1025.  
 13 So on 1032, do we see -- actually, let's look  
 14 at 1025. We see in [REDACTED] --  
 15 A Prepay.  
 16 Q -- prepay, card number 1288?  
 17 A Yes, sir.  
 18 Q And then on 1032, a [REDACTED] final transaction?  
 19 A [REDACTED] was a prepay also.  
 20 Q A prepay. Okay. Wait, I got my numbers mixed  
 21 up here. I apologize. Let me -- you have 1032 in your  
 22 hand?  
 23 A Yes, sir.  
 24 Q Okay. There's a [REDACTED] final bill here,  
 25 right?

1 [REDACTED] transaction with the same identifying markers on  
 2 it, right? 1688770, transaction number 1288, last four?  
 3 A Yes, sir.  
 4 Q The same authorization, same signature --  
 5 A Yes, sir.  
 6 Q -- P. Jakeman?  
 7 Okay. So that's [REDACTED] worth of  
 8 fuel, right?  
 9 A Yes, sir.  
 10 Q All right. Thank you.  
 11 MR. REHWINKEL: So 1032, we'll make that --  
 12 MS. PONDER: 71.  
 13 MR. REHWINKEL: -- 71. I should probably have  
 14 added that to the big one, but --  
 15 (Exhibit 71 was marked for identification.)  
 16 BY MR. REHWINKEL:  
 17 Q Look at 1022. This is the first page of 68.  
 18 Let's look at page 1022 and I want to ask you about  
 19 these two transactions. They don't have the same  
 20 markers on them, but is there anything about them that  
 21 you think is unusual?  
 22 A They're both copies of receipts, are both  
 23 receipt copies. Neither has the time indicated on it.  
 24 Q Do you see a little line under the 6?  
 25 A Yes, sir.

1 Q On the bottom of the [REDACTED] receipt, it's got  
2 the same signature, [REDACTED]?

3 A Yes, sir.

4 Q All right. Same last four, but otherwise  
5 different markers and it appears to be a completed  
6 receipt?

7 A Yes, sir.

8 Q Based on what you've seen in the others and,  
9 sort of, the relationship of the numbers, would there be  
10 some level of wanting to know a little more about this  
11 transaction? It's two different pumps.

12 A Yes, it's possible, but it's not uncommon when  
13 crews travel that one card is used to fill up multiple  
14 trucks.

15 Q Okay. All right. I want to go to 1059 and I  
16 want to ask you to take a look at this.

17 Are you familiar with the -- first of all,  
18 these are two receipts, but I want to ask you about the  
19 one on the right. It's a -- well, tell me about this.  
20 Does this look like a receipt that should have been  
21 paid, the [REDACTED] one?

22 A No, sir.

23 Q It's just [REDACTED]. It doesn't say it's a prepay.  
24 It says "store copy" on it, and someone wrote in the  
25 gallon agenda and the fuel. Is there anything about

1 BY MR. REHWINKEL:

2 Q 1063, let's look at that one. Let me hand you  
3 this. I want to ask you about the receipt from  
4 [REDACTED] for [REDACTED]. And this is a prepay,  
5 right? [REDACTED].

6 A Yes, sir.

7 Q It's a prepay and it has truck 35, truck 38,  
8 truck 21 and truck 6 written around the word "Pilot"  
9 there, right?

10 A Yes, sir.

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 A Yes, sir.

15 Q All right. And it's signed by, it looks like,  
16 [REDACTED] or something like that, right?

17 A Yes, sir.

18 Q And it's on September 8th at 3:36 in the  
19 afternoon, right?

20 A Yes, sir.

21 Q This was paid, right?

22 A Yes, sir, I'm pretty sure it would have been.

23 Q Let's look at page 1064. I'll hand you this  
24 one and ask you if the -- look at the [REDACTED]  
25 receipt from [REDACTED].

1 this?

2 Now, let me ask you this: Is it possible that  
3 the person took the wrong receipt and didn't have the  
4 one with the detail on it and filled it in?

5 A Yes, sir.

6 Q Okay. But it's one of those [REDACTED] receipts?

7 A Yes, sir.

8 Q Okay. All right. One other question: The  
9 [REDACTED]3 with the dollar sign after the 3 and circle, does  
10 that represent [REDACTED]  
11 [REDACTED]s?

12 A I'm not sure what that represents.

13 Q Would you agree with me, subject to check,  
14 that [REDACTED]?

15 A Yes, sir.

16 [REDACTED]  
17 [REDACTED]

18 A Yes, sir.

19 Q Okay. So we don't need to make that one.  
20 Let's see.

21 All right. 1063?

22 MR. WAHLEN: Is that going to be an exhibit,  
23 Charles?

24 MR. REHWINKEL: I don't know that I am, Jeff.  
25 I don't think so.

1 A Yes, sir.

2 Q The same signature, same last four, 3019?

3 A Yes, sir.

4 Q The same transaction number, 2967837?

5 A Yes, sir.

6 Q So here you have an instance of, on two  
7 different pages, separated two receipts for [REDACTED]  
8 reimbursed for [REDACTED] of fuel?

9 A Yes, sir.

10 Q Okay. That [REDACTED] on the first [REDACTED] receipt  
11 shouldn't have been paid, right?

12 A No, sir, it's prepay.

13 Q And both of these have [REDACTED]  
14 [REDACTED] circled on them, don't they?

15 A Yes, sir.

16 Q All right.

17 A That's what it appears.

18 Q Yes. One other question about the [REDACTED]  
19 receipt on page 1064. It's got a truck number written  
20 by it, doesn't it?

21 A Yes, sir.

22 Q 42?

23 A Yes, sir.

24 Q And 42 isn't in the group that's on the other  
25 page --

1 A No, sir.  
 2 Q -- associated with the [REDACTED] right?  
 3 A No, sir.  
 4 Q So there looks to be some level of intent to  
 5 deceive there, doesn't there?  
 6 A Yes, sir.  
 7 MR. REHWINKEL: This will be -- are we 70?  
 8 MS. PONDER: 72.  
 9 MR. REHWINKEL: 72. I want to call these  
 10 [REDACTED] Receipts.  
 11 And just for the record, Jeff, there's some  
 12 light circling in pencil on here. Those are mine.  
 13 I shouldn't have done that, but I adulterated the  
 14 document.  
 15 MR. WAHLEN: We're not going to tease you for  
 16 that. That's 1063 and 1064?  
 17 MR. REHWINKEL: Yes, sir.  
 18 (Exhibit 72 was marked for identification.)  
 19 BY MR. REHWINKEL:  
 20 Q I want you to hold onto 72 and I want to hand  
 21 you page 1065 and ask you if -- yeah. This is a receipt  
 22 in [REDACTED] for [REDACTED]. It's prepaid?  
 23 A Yes, sir.  
 24 Q And it appears to have been paid, right?  
 25 A Yes, sir.

1 A Yes.  
 2 Q Yes. All right. I want to go to pages 1296  
 3 and 1298. I mean 1296 through 1298. I think I've  
 4 written down the wrong number.  
 5 MR. REHWINKEL: Let's go off the record for a  
 6 second.  
 7 (Discussion off the record.)  
 8 MR. WAHLEN: Do you want to take a break?  
 9 MR. REHWINKEL: Let's take a break. Let's  
 10 come back in ten minutes. Everybody take a break.  
 11 (Recess from 9:50 a.m. to 10:07 a.m.)  
 12 BY MR. REHWINKEL:  
 13 Q Well, I would hand you 1354 and 13 -- 1353 and  
 14 54, but the documents I got are sort of cut off, but I  
 15 think on the screen, that might be reduced.  
 16 MR. WAHLEN: Do you want us to reprint those?  
 17 MR. REHWINKEL: Well, if he could use it, it's  
 18 fine, if he could use that.  
 19 MR. WAHLEN: Okay.  
 20 MR. REHWINKEL: Because I don't have the full  
 21 documents there.  
 22 BY MR. REHWINKEL:  
 23 Q All right. So if you can look at 1353 and  
 24 1354, can you tell me what this is a summary of?  
 25 A This looks like a summary of work hours for

1 Q It has the same last four as we saw in that  
 2 [REDACTED] transaction, 3019?  
 3 A Yes, sir.  
 4 Q Based on what you've seen in [REDACTED], had you  
 5 seen this at the time it was presented, would you have  
 6 paid this [REDACTED] receipt?  
 7 A No, sir. We would have wanted a final  
 8 receipt.  
 9 Q Okay. And you might have had some concern  
 10 about the card associated with it?  
 11 A Yes, sir.  
 12 MR. REHWINKEL: Okay. So this will be 73, and  
 13 we'll call it [REDACTED] Fuel Receipt.  
 14 (Exhibit 73 was marked for identification.)  
 15 BY MR. REHWINKEL:  
 16 Q On the receipts that show [REDACTED]  
 17 [REDACTED], if that's what that is, the payment would have  
 18 been the outlay that the customer wouldn't be  
 19 responsible for. It would have been [REDACTED]  
 20 [REDACTED] on all those transactions, right?  
 21 A Yes, sir. I'd have to ensure that with the  
 22 invoice to make sure that somebody didn't mistakenly  
 23 draft the [REDACTED], but that would have been our  
 24 intent would be pay [REDACTED] on those.  
 25 Q Right. [REDACTED]?

1 two-man crews.  
 2 Q Do you know what company this document would  
 3 relate to?  
 4 A This would be the [REDACTED].  
 5 Q Okay. So this wouldn't be [REDACTED] or  
 6 [REDACTED]?  
 7 A No, sir.  
 8 MR. MOYLE: On my screen I see 1352. Are you  
 9 looking at 1352 or 1353?  
 10 MR. REHWINKEL: 53. Look on the right. The  
 11 number's one off for how they find this on screen.  
 12 MR. WRIGHT: John, it's page 1352 of the  
 13 5,572, but it's Bates numbered 1353.  
 14 MR. MOYLE: Okay. Thank you.  
 15 MR. WRIGHT: You're welcome.  
 16 MR. REHWINKEL: Let's get a late-filed, if we  
 17 can, Jeff, of 1353-1354 reconciliation to invoice  
 18 because we're having trouble tying it to the  
 19 billing that it supports.  
 20 MR. WAHLEN: Okay.  
 21 MR. REHWINKEL: Okay.  
 22 BY MR. REHWINKEL:  
 23 Q Does that make sense to you?  
 24 A Sure.  
 25 MR. WAHLEN: Do you understand that, Wes?



1 THE WITNESS: Yes, as long as you have a note  
 2 that I can read later.  
 3 MR. WAHLEN: I have a note and it's typed, so  
 4 we have a chance.  
 5 (Exhibit 74 to be marked and produced as a  
 6 late-filed exhibit.)  
 7 BY MR. REHWINKEL:  
 8 Q Let's look at 1505. I'm going to hand you  
 9 1505. Based on what you said about 1353 and 1354, it  
 10 should tie into the number that's on that invoice. Is  
 11 that right, the [REDACTED]?  
 12 A Yes, sir.  
 13 Q And that's an invoice just for [REDACTED]  
 14 [REDACTED], right?  
 15 A Yes, sir.  
 16 One note: I would need to determine if this  
 17 [REDACTED].  
 18 Q Okay.  
 19 A Since it's not indicated.  
 20 Q We think that the [REDACTED] is what was paid  
 21 in U.S. dollars.  
 22 A So this would have been reduced by [REDACTED].  
 23 MR. REHWINKEL: But as part of the  
 24 reconciliation, you can verify that or give an  
 25 answer to that, Jeff. Is that --

1 MR. REHWINKEL: Okay. Let's go off the record  
 2 for a second.  
 3 (Discussion off the record.)  
 4 MR. REHWINKEL: Back on the record.  
 5 BY MR. REHWINKEL:  
 6 Q I had asked you about this document and you  
 7 said it appeared that it would be related to [REDACTED], right?  
 8 A Yes, sir.  
 9 Q And the reason you thought that was because it  
 10 had a level of detail that you didn't have for the two  
 11 [REDACTED]?  
 12 A Yes, sir.  
 13 Q In the off-the-record conversation, it appears  
 14 that this may be in the [REDACTED] documents but related to  
 15 [REDACTED].  
 16 A Yes, sir.  
 17 MR. REHWINKEL: All right. Jeff, can we get a  
 18 late-filed exhibit that would provide whatever  
 19 level of supporting invoice detail you have for  
 20 [REDACTED]  
 21 [REDACTED] that we don't already have?  
 22 MR. WAHLEN: Yes.  
 23 MR. REHWINKEL: All right. So this would  
 24 be -- we'll give it a short title of [REDACTED]  
 25 Supporting Documentation.

1 MR. WAHLEN: That's fine.  
 2 MR. REHWINKEL: Let's put 1506 on the screen.  
 3 BY MR. REHWINKEL:  
 4 Q And I'll hand you 1549. Does 1506 tie to  
 5 1549?  
 6 A I don't believe so.  
 7 Q What would that --  
 8 A This is [REDACTED].  
 9 Q 1549 is? And what is 1506?  
 10 A I'm sorry.  
 11 Q That's okay.  
 12 A Yes, sir.  
 13 Q So 1506 is a component of the invoice that's  
 14 on 1549?  
 15 A Yes, sir.  
 16 Q Now let's look at 1553 through 1558. I'll  
 17 hand you those.  
 18 MR. WAHLEN: Your numbers are 1553 through  
 19 1558?  
 20 MR. REHWINKEL: Yes, sir.  
 21 BY MR. REHWINKEL:  
 22 Q Do you know what [REDACTED] invoice this supports,  
 23 this meaning 1558?  
 24 A This looks like it would have supported the  
 25 [REDACTED] invoice.

1 MR. WAHLEN: Very well. And that's number 75?  
 2 MR. REHWINKEL: Yes.  
 3 (Exhibit 75 to be marked and produced as a  
 4 late-filed exhibit.)  
 5 BY MR. REHWINKEL:  
 6 Q Let me hand you just a couple of loose ends  
 7 here, 1378 -- actually, I'm going to give you 1378 and  
 8 1359, and let's look at 1378 first.  
 9 Does this look like a timesheet for [REDACTED]  
 10 [REDACTED]  
 11 A Yes, sir.  
 12 Q And that's a name we saw on some of the fuel  
 13 receipts, right?  
 14 A Yes, sir.  
 15 Q And I may have said [REDACTED], but it's  
 16 [REDACTED], right?  
 17 A Yes, sir.  
 18 Q Now let's go down to, what was that, 1359?  
 19 A Yes, sir.  
 20 Q And let me ask you if that's a timesheet for  
 21 [REDACTED].  
 22 A Yes, sir.  
 23 Q All right. And it's under the [REDACTED]  
 24 [REDACTED] heading, right?  
 25 A Yes, sir.

1 Q Okay. Would you assume that those two  
2 individuals are [REDACTED] employees rather  
3 than contractors?

4 A Yes, sir.

5 Q All right. Thank you. I don't think I need  
6 to put these in the record as exhibits.

7 All right. I want to hand you a series of  
8 receipts in pages 1347 through 1352 and ask you to take  
9 a look at the first one, 1347. And I'm also going to  
10 give you a document with some pictures on it. We'll put  
11 that in the record and send that down.

12 On 1347, this is a receipt for a company  
13 called [REDACTED] and it's a [REDACTED] receipt and it has  
14 something called WLSN SLEEK CEL, [REDACTED], and then some  
15 gas cans for [REDACTED] and some diesel cans for [REDACTED].  
16 Do you see that?

17 A Yes, sir.

18 Q Do you know what the first item is?

19 A I believe it's a cell phone repeater  
20 amplifier.

21 Q Okay. Is that something that is normally paid  
22 for in storm work?

23 A Yes and no. I mean, we've seen them. We've  
24 seen GPSs charged because they were required by the  
25 utility for the trip down, but --

1 September 7th, right? And it's for an electric cooler?

2 A Yes, sir.

3 Q Now, that cooler was challenged when [REDACTED]  
4 bought one and sought reimbursement, right?

5 A Yes, sir.

6 Q Okay. So should it have been challenged with  
7 [REDACTED]

8 A Yes, sir.

9 Q All right. And there's a picture of -- is  
10 this what that looks like? Let me hand you -- on here  
11 it's a 45 liter 12-volt cooler. Does that look  
12 something like that?

13 A I would imagine.

14 Q Okay.

15 A I can't match up numbers or anything.

16 Q All right. We won't put that in. We'll  
17 just -- so let's go to the next page.

18 All right. Cabela's, that's an Outfitter, and  
19 we see receipts for Outfitter Quad Packs, [REDACTED], one,  
20 two, three, four of them, and two receipts, right?

21 A Yes, sir.

22 Q Do you know what those are?

23 A No, sir.

24 Q Can you look at the pictures in the back and  
25 see if you see -- does that look like [REDACTED] Midland

1 Q Okay. Is there something wrong with the cell  
2 service down in Florida?

3 A No, sir.

4 Q All right. So if you look at the document  
5 I've handed out there on your -- to your left, is that a  
6 Wilson Sleek Cell?

7 A Yes, sir.

8 Q Okay. So it's something that looks like that?

9 MR. WAHLEN: Are you going to mark this  
10 picture?

11 MR. REHWINKEL: Yes. I think what I'm going  
12 to do is let's take -- let me see these invoices  
13 and these pictures. I'm going to -- we'll call  
14 this Miscellaneous [REDACTED] Equipment, and it will  
15 be the next exhibit, and it will be those 1347  
16 through 1352, and then photographs of electronics.

17 MR. WRIGHT: All as one exhibit, Charles?

18 MR. REHWINKEL: Yes.

19 (Exhibit 76 to be marked and produced as a  
20 late-filed exhibit.)

21 BY MR. REHWINKEL:

22 Q All right. Let's look at the next page, 1348.  
23 Actually, let's skip 1348 and go to 1349 and look at the  
24 next -- this is a [REDACTED] receipt on [REDACTED]  
25 [REDACTED], probably in a place called [REDACTED], on

1 Outfitter Quad Packs?

2 A Yes, sir.

3 Q And these are walkie-talkie sets, right?

4 A Right.

5 Q Is that something that you would expect a  
6 company to come equipped with?

7 A It would be up to the company.

8 Q Okay. Is that something that should be  
9 reimbursed?

10 A It should be challenged.

11 Q Okay. And what is a 15 watt -- is that 8 MRS  
12 15 watt? Does that look -- GMRS radio?

13 A Yes, sir.

14 Q GMRS, is that a truck radio?

15 A It could be a walkie-talkie usually.

16 Q Is that -- let me show you something from  
17 Cabela's and ask you if that's --

18 So do you expect people to need to put radios  
19 in their trucks to come down to work on the storm?

20 A No, sir.

21 Q They should already have that, right?

22 A Yes, sir.

23 Q So that shouldn't have been -- at least should  
24 have been challenged, probably not paid, right?

25 A Yes, sir.

1 Q All right. Let's go to the next page. We can  
 2 skip that. All right. Stop here.  
 3 [REDACTED] on 15 -- what's that  
 4 page number?  
 5 A 1352.  
 6 Q 1352. This is -- I can't see the bottom. Go  
 7 down. Okay. [REDACTED] for signage?  
 8 A Yes, sir.  
 9 Q All right. This says "Construction Ahead" and  
 10 "Utility Truck." Are these the kind of things that you  
 11 expect to have to pay for for storm work?  
 12 A No, sir.  
 13 Q All right. So this was probably a receipt, if  
 14 it's bought [REDACTED] and it would  
 15 have been reimbursed?  
 16 A Yes, sir.  
 17 [REDACTED]  
 18 [REDACTED] --  
 19 A I'm not sure.  
 20 Q Okay. All right. And we can put that exhibit  
 21 aside.  
 22 Do you know if [REDACTED] billed  
 23 TECO for helmets and rain gear and clothing?  
 24 A I do not know, sir.  
 25 Q Okay. Let me ask you to look on page 1544.

1 Q -- in the mutual assistance world, right?  
 2 A No, sir.  
 3 MR. REHWINKEL: Okay. I'm just going to make  
 4 this 1544 as [REDACTED] Provisioning Invoice, and it  
 5 will be just this one page.  
 6 (Exhibit 77 was marked for identification.)  
 7 BY MR. REHWINKEL:  
 8 Q Let's look at [REDACTED]. Let's do a  
 9 late-filed of 78, and what I'd like to ask is for you to  
 10 identify whether the Exhibit 77 invoice, which company  
 11 that's for, whether it's [REDACTED]  
 12 [REDACTED].  
 13 A Okay.  
 14 Q Okay. Unless you know for certain.  
 15 A I never saw any real detail for [REDACTED] or  
 16 [REDACTED].  
 17 Q Okay.  
 18 A So --  
 19 Q We think it's [REDACTED] so that's why we would  
 20 like to verify that.  
 21 A May I hold that for a second?  
 22 Q Yes. 1548 seems to tie to that number.  
 23 (Exhibit 78 to be marked and produced as a  
 24 late-filed exhibit.)  
 25

1 Do you know what 1544 represents?  
 2 I'm going to want you to scan down to --  
 3 This looks like a listing of gloves and chain  
 4 saw, chaps, rain jackets, helmets, rain pants, totaling  
 5 about \$ [REDACTED] for invoice -- wait, no -- invoice 51513508  
 6 there about four lines from the bottom?  
 7 A Yes, sir.  
 8 Q All right. Would this be the type of cost  
 9 that would have been paid?  
 10 A We normally pay for consumables.  
 11 Q Are these considered consumables?  
 12 A Some of these would be consumables.  
 13 Q Are helmets considered consumables?  
 14 A Usually not.  
 15 Q I mean, would you kind of expect a crew to be  
 16 already, sort of, provisioned for work?  
 17 A Yes, sir.  
 18 Q It rains in [REDACTED], doesn't it?  
 19 A Yes, sir.  
 20 Q Yeah, okay. I'm not trying to make light of  
 21 it. I'm just trying to understand what the rules are.  
 22 Because you really ordinarily wouldn't pay a bill like  
 23 this -- or you wouldn't see a bill like this from other  
 24 crews --  
 25 A No, sir.

1 BY MR. REHWINKEL:  
 2 Q Okay. Let's go to [REDACTED] and I'm  
 3 going to show you from page 1566, on the right-hand side  
 4 we see a Longhorn Steakhouse receipt in Calhoun, Georgia  
 5 dated 9/11. And I want to ask you, if we can go to the  
 6 bottom of that page, is this -- it says, "Duplicate  
 7 Receipt, Stored Order." Are these two documents the  
 8 bill and the receipt, 6869?  
 9 A It appears to be that it was one long receipt.  
 10 Q Okay. So this receipt is substantiated; is  
 11 that right?  
 12 A Yes, sir.  
 13 Q Okay. Thank you.  
 14 Let's look at 1573, and do you know, there's a  
 15 notation -- first of all, do you know what this  
 16 represents?  
 17 Actually, let me do this. Let me give you  
 18 1573 through 1575 as one exhibit and ask you -- did you  
 19 review this [REDACTED]  
 20 A No, not the detail personally.  
 21 Q But your team did?  
 22 A Yes, sir.  
 23 Q All right. Do you know whether this outfit,  
 24 you paid demobilization for them?  
 25 A I believe we did, but I would have to check

1 records to make sure of that.  
 2 Q Their timesheets show they worked past the  
 3 17th?  
 4 A Yes, sir.  
 5 Q So would that indicate that they traveled --  
 6 A Yes, sir.  
 7 Q -- at TECO's expense?  
 8 A Yes, sir.  
 9 Q Okay.  
 10 A It appears to.  
 11 Q What is -- on 1573 can you look on the left  
 12 half of the page? It says, "TECO rates, [REDACTED] rates." Do  
 13 you know what that means? I know there's no numbers  
 14 under it. I was just wondering if they were doing work  
 15 for [REDACTED].  
 16 A It's possible. I don't know what those rates  
 17 are.  
 18 Q If they did rates -- what is [REDACTED] rates?  
 19 That's [REDACTED] rates probably?  
 20 A Yes, sir, I would imagine those are.  
 21 Q So I'm not suggesting there's anything wrong  
 22 here. I just want to know if they had a document that  
 23 mentions uphill if there's any indication they did work  
 24 for [REDACTED], even though you paid demobilization for them.  
 25 A We --

1 [REDACTED] rates for those mechanics.  
 2 MR. REHWINKEL: Okay. Thank you. We'll just  
 3 make this [REDACTED] Timesheets?  
 4 MR. WAHLEN: You want to make that as an  
 5 exhibit?  
 6 MR. REHWINKEL: Yes.  
 7 MR. WRIGHT: That's 1573 through 1575?  
 8 MR. REHWINKEL: Yes.  
 9 (Exhibit 80 was marked for identification.)  
 10 BY MR. REHWINKEL:  
 11 Q This may be a question better asked to  
 12 Beth Young, but with respect to the [REDACTED]  
 13 [REDACTED] bill, if the labor costs are 40 percent and the  
 14 non-labor costs are 60 percent of the total bill, is  
 15 that a ratio that TECO seeks to avoid when you're  
 16 procuring services?  
 17 A I'm not sure.  
 18 Q Okay. Would that be better asked to her?  
 19 A Yes, sir. Sorry about this.  
 20 Q Do you have any guidelines as far as, like --  
 21 [REDACTED]  
 22 [REDACTED]  
 23 A Right.  
 24 Q That would be inefficient, right? Is there  
 25 sort of a balance that you think is good?

1 Q Would a late-filed --  
 2 A Sure.  
 3 Q -- explain whether [REDACTED] provided --  
 4 did work for [REDACTED]?  
 5 MR. WAHLEN: So 79 would be late-filed: Did  
 6 [REDACTED]  
 7 MR. REHWINKEL: -- work for [REDACTED].  
 8 MR. WAHLEN: -- work for [REDACTED].  
 9 (Exhibit 79 to be marked and produced as a  
 10 late-filed exhibit.)  
 11 A I've seen invoices or summary sheets like this  
 12 before, and what the accounting department would  
 13 sometime do is create a master.  
 14 BY MR. REHWINKEL:  
 15 Q Okay.  
 16 A And then you have to see the detail of what  
 17 charges go to whom on -- so this very well could be a  
 18 master sheet and they would have included [REDACTED] and taken  
 19 ours off for the [REDACTED].  
 20 Q Okay. And I just -- I just want to ask the  
 21 question because we just need to verify that.  
 22 A Yes. And the reason that I, kind of, see that  
 23 is the last two lines toward the bottom, if you can  
 24 scroll up, see the mechanics where they have lined  
 25 through the TECO rates there, but they have the [REDACTED]

1 A I have no idea.  
 2 Q Okay. That's not -- that's above your pay  
 3 grade?  
 4 A Yes, sir.  
 5 Q Okay. All right. [REDACTED] Do you  
 6 know if [REDACTED] is a mutual aid company?  
 7 A I don't believe they are.  
 8 Q Okay. Is that an IOU?  
 9 A I have no idea.  
 10 Q Do you know when [REDACTED] first started --  
 11 Well, first of all, is this an invoice you  
 12 reviewed, [REDACTED]?  
 13 A It would have been my team, yes.  
 14 Q Do you know when they first started performing  
 15 actual restoration activities in Florida?  
 16 A Not off the top of my head, no.  
 17 Q Let's look at 273. Take a look at 273. And I  
 18 guess we could just look at the top line that looks like  
 19 an employee is billing 20 hours that day. Is that --  
 20 what date is that? Is that the 8th?  
 21 A Well, that's the timesheet day, but the  
 22 paid-to date is 9/15.  
 23 Q What does that mean to you?  
 24 A It means that their hours -- it should mean  
 25 that that was the date of the timesheet.

1 Q Okay. So do you read this document to say  
2 that whoever is on the top line there worked,  
3 [REDACTED] -- is that what it says?

4 A Yes, sir.

5 Q -- worked 20 hours?

6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]

10 Q But you don't know about [REDACTED]

11 A No, sir.

12 Q Well, is there anything about net hours there  
13 that's significant?

14 A It says that 20 hours was the net time he  
15 worked that day.

16 Q What is net versus some other kind of hours,  
17 do you know?

18 A I have no idea, sir.

19 Q All right. And this 20 hours is probably at  
20 least four days before they did any storm restoration  
21 work, right?

22 A Yes, sir.

23 Q What does your record show when they first  
24 started doing storm work?

25 A We show that they were mobilized on the 8th or

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]

6 A Yes, sir.

7 Q Okay. That's kind of expensive work, isn't  
8 it?

9 A Yes, sir.

10 Q Do you know when [REDACTED] was released?

11 A It looks like they were released on the 17th.

12 Q At what time? Do you have the time?

13 A No, sir. I'd have to --

14 Q Is this the POD 14 -- where it says [REDACTED]

15 [REDACTED], is that the same?

16 A Yes, sir.

17 Q So that's 1141?

18 A Yes, sir.

19 Q Who would be the person that would know why  
20 you released a certain contractor on a certain day with  
21 respect to, you know, the quality of the work you were  
22 getting out of them, the cost, et cetera? That was a  
23 decision made above you?

24 A Yes, sir.

25 Q All right. Would Beth Young be someone to ask

1 the 9th -- the 9th.

2 Q All right. So should people have been billing  
3 20 hours on the 8th?

4 A I wouldn't think so.

5 Q All right. So on the 9th what is the -- let's  
6 go to the left side of the document.

7 So this is [REDACTED] here, and let's look at --  
8 how many hours does it look like to you that he recorded  
9 and was billed for on the 9th?

10 A It looks like 24 hours.

11 Q So 18 plus six?

12 A Yes, sir.

13 Q All right. Is that your expectation?

14 A I would have to see if we have any notes on  
15 their billing.

16 Q And he would have been billing that at  
17 overtime?

18 A It looks like he billed 18 hours at overtime  
19 and six hours at regular time.

20 Q All right. Is that a provision that's  
21 understood in the SEE guidelines?

22 A Well, this wouldn't have been an SEE company.  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

1 a question like that to?

2 A It's possible.

3 Q Okay. And I'm not trying to get you to commit  
4 for her, but she would be better than you to pose the  
5 question to?

6 A I would not have an idea about the quality of  
7 the fieldwork of the crews.

8 Q Okay. It seems like a crew that was costing  
9 that much, you wouldn't want to hold onto them any  
10 longer than you had to, right?

11 A Yes, sir.

12 Q Do you know whether they went to another  
13 utility after they were released?

14 A Off the top of my head, I do not.

15 Q All right. Was it kind of expected that each  
16 utility, when they got the mobilization call, that they  
17 would -- everybody goes down and puts new wiper blades  
18 on their trucks?

19 A No, sir.

20 Q This outfit, [REDACTED] if I could hand you  
21 1591 --

22 MR. REHWINKEL: Okay. Let's -- before I do  
23 that, let's make --

24 MR. WAHLEN: 2073.

25 MR. REHWINKEL: 2073, we'll make that the next

1 exhibit number. We'll call it [REDACTED] Timesheets.  
 2 MR. WAHLEN: That's 81?  
 3 MR. REHWINKEL: 81.  
 4 (Exhibit 81 was marked for identification.)  
 5 BY MR. REHWINKEL:  
 6 Q So on -- well. This is in Plant City. So  
 7 would you expect them to put wiper blades on their  
 8 trucks when they're out working?  
 9 A No, sir. And it would have been -- we would  
 10 have -- if this had been an SEE company, we would have  
 11 considered that routine, I'm pretty sure, maintenance.  
 12 Q Okay. Well, let's look at 1593, and this is  
 13 the O'Reilly Auto Parts store it looks like somewhere  
 14 back in [REDACTED]  
 15 MR. WAHLEN: Charles, the Advance Auto Parts,  
 16 are you going to mark that as an exhibit or --  
 17 MR. REHWINKEL: I may. We'll see how this  
 18 goes.  
 19 BY MR. REHWINKEL:  
 20 Q -- [REDACTED] on 9/9 at 6:45 p.m.  
 21 So it looks like somebody went and got six  
 22 sets of wiper blades on the day they were mobilizing?  
 23 A Yes, sir.  
 24 Q Is that considered routine?  
 25 A I would consider it routine. I would consider

1 Q All right. So this is a receipt for O'Reilly  
 2 Auto Parts on -- what is being bought here?  
 3 A I don't know, but it kind of looks like one of  
 4 those mobile battery jump-start kits.  
 5 Q And what's the date on this receipt?  
 6 A September 8th.  
 7 Q At 9:00 a.m.?  
 8 A Yes, sir.  
 9 Q That was before they mobilized, wasn't it?  
 10 A Yes, sir.  
 11 Q All right. So that shouldn't have been  
 12 claimed or paid, right?  
 13 A I don't know -- no, I don't think so. I don't  
 14 know exactly when we committed to them.  
 15 Q Okay.  
 16 A They could be preparing, but questionable  
 17 charge.  
 18 Q So charges like this, sort of, create the  
 19 impression, don't they, that a call goes out and some  
 20 crews just go out and, sort of, take advantage of the  
 21 situation and do things that they hadn't done before --  
 22 A Right. Yes, sir.  
 23 Q -- that they should have done before?  
 24 A (Nods head.)  
 25 MR. REHWINKEL: Okay. So 1598 will be

1 wiper blades as being routine maintenance.  
 2 Q Why would you get six pair of them right  
 3 before you left -- you know, left the yard?  
 4 A I have no idea.  
 5 Q Okay. And then they got more wiper blades  
 6 down in Plant City?  
 7 A Bad windshields, I guess. Lovebugs between  
 8 here and there.  
 9 Q Okay. So five days apart they had to replace  
 10 their -- well, we don't know if it's the same trucks,  
 11 right?  
 12 A No, sir.  
 13 MR. REHWINKEL: All right. This will be 1591,  
 14 93, [REDACTED] Wiper Blades would be the number -- the  
 15 name.  
 16 MR. WAHLEN: That's 82?  
 17 MR. REHWINKEL: Yes.  
 18 (Exhibit 82 was marked for identification.)  
 19 BY MR. REHWINKEL:  
 20 Q Let me show you 1598 and ask you if you know  
 21 what -- is that -- what is that a receipt for, what  
 22 store?  
 23 A O'Reilly Auto Parts.  
 24 Q Is it 1598 at the bottom?  
 25 A Yes, sir.

1 O'Reilly Auto Parts.  
 2 MR. WAHLEN: That's 83?  
 3 MR. REHWINKEL: I'm sorry, 83.  
 4 (Exhibit 83 was marked for identification.)  
 5 BY MR. REHWINKEL:  
 6 Q [REDACTED] Do you know [REDACTED] Are you  
 7 familiar with them?  
 8 A They're one of the contractors that we had on  
 9 our system.  
 10 Q Did you review their invoices?  
 11 A My team would have reviewed their invoices.  
 12 Q Just a few questions about [REDACTED]. Let me  
 13 just hand you 2106. I just want to ask you a question  
 14 about the bottom.  
 15 The right-hand side, bottom line, just above  
 16 it you see the letters I and C?  
 17 A Yes, sir.  
 18 Q Do you know what those mean?  
 19 A No, sir.  
 20 Q Have you seen anything that says complete and  
 21 incomplete related to those?  
 22 A No, sir.  
 23 MR. REHWINKEL: All right. We'll need a  
 24 late-filed, Jeff, 84, explanation of I and C, just  
 25 the letters I and C on [REDACTED] timesheets.

1 THE WITNESS: I see on the left it does have  
 2 complete and incomplete on that line, so --  
 3 BY MR. REHWINKEL:  
 4 Q Okay. Maybe we don't need that.  
 5 A We'll make an assumption that --  
 6 Q Do you know what it's referring to?  
 7 A No, sir. The only thing I can think is that  
 8 they possibly used that same timesheet on their home  
 9 station and it refers to job status of crew hours being  
 10 complete or incomplete for the day.  
 11 Q Okay. Let's look at 2182.  
 12 MR. WAHLEN: Just to be clear, you don't need  
 13 it?  
 14 MR. REHWINKEL: We don't need it, I don't  
 15 think.  
 16 BY MR. REHWINKEL:  
 17 Q I want to ask you about 2182 through 2190. Do  
 18 you know whether these costs on 2182 of [REDACTED] were  
 19 paid?  
 20 A If they were part of the invoice, we would  
 21 have paid them.  
 22 Q Would you agree that the summary and then the  
 23 documents behind that are for [REDACTED] for  
 24 [REDACTED],  
 25 [REDACTED]?

1 MR. REHWINKEL: Yes.  
 2 MR. WRIGHT: Thank you.  
 3 (Exhibit 84 was marked for identification.)  
 4 BY MR. REHWINKEL:  
 5 Q On page 2105, let me just hand you a timesheet  
 6 documentation and ask you, does it appear that this  
 7 [REDACTED] is starting off work on the 10th? Is the  
 8 10th the day that they started work, they started  
 9 mobilizing?  
 10 A I can't tell if it was the 10th or the 11th.  
 11 I'd have to go back to other notes.  
 12 Q Okay. So this document -- let's look at the  
 13 timesheet. Can you tell on the second page, 2106, what  
 14 the first date they billed time for?  
 15 A It looks like September 10th.  
 16 Q And were they from the get-go billing  
 17 overtime?  
 18 A I believe so.  
 19 Q And why would that have been the case?  
 20 A That's their storm rate procedure, whatever.  
 21 Q Well, is there a third document there that  
 22 purports to be -- to give a basis for why that -- did  
 23 they work -- did they give you verification about how  
 24 many hours they worked before they started mobilizing  
 25 for you?

1 A Yes, sir.  
 2 Q And the dates on those are from 9/11 to 9/14?  
 3 A Yes, sir.  
 4 Q Was that equipment that TECO requested?  
 5 A I don't know, sir.  
 6 Q Was it equipment that TECO used?  
 7 A I don't know.  
 8 Q Okay. Do you know if those [REDACTED] --  
 9 [REDACTED]  
 10 [REDACTED]  
 11 A Yes, sir.  
 12 Q Do you know whether those ever made it to  
 13 Tampa Electric territory?  
 14 A I don't know.  
 15 Q Do you know whether the crews that were  
 16 associated with that equipment ever made it to Tampa  
 17 Electric territory?  
 18 A [REDACTED] were on our -- on our system.  
 19 We had multiple crews.  
 20 Q Okay. Should this have been paid?  
 21 A Without verification, no, sir.  
 22 MR. REHWINKEL: All right. This will be 84,  
 23 and we'll call it [REDACTED]  
 24 Invoices.  
 25 MR. WRIGHT: All nine pages, Charles?

1 A No, sir.  
 2 Q Okay. Now, yesterday I thought that there was  
 3 an indication that your expectation was that you would  
 4 get crews, I'm going to use the word "fresh," i.e.  
 5 they're starting regular time, they're not already way  
 6 into their regular hours. Is that right?  
 7 A Yes, sir.  
 8 Q [REDACTED]  
 9 [REDACTED]  
 10 A I have no idea on that.  
 11 Q Okay. Let me ask you about 2108 through  
 12 2111 -- 2110, I'm sorry, and ask you to look at the last  
 13 page there.  
 14 [REDACTED]  
 15 [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]  
 18 [REDACTED]  
 19 [REDACTED]  
 20 [REDACTED]  
 21 Q And there's an upper -- right by your thumb  
 22 there, there's a signature. That's not a TECO  
 23 signature, is it?  
 24 A No, sir.  
 25 Q All right. Is this something you required

1 them to provide?  
 2 A Not to my knowledge.  
 3 Q All right. On 2108, that appears to be a crew  
 4 associated with a [REDACTED]; is that right?  
 5 A Yes, sir.  
 6 Q And if you look on the second page of that  
 7 2109, does it show the equipment that his crew uses and  
 8 the rates at which that equipment is billed and hours  
 9 that were used?  
 10 A I see hours. I don't see rates.  
 11 Q Was there a dollar amount associated with  
 12 equipment on that invoice?  
 13 A There is some cost penciled in at the bottom.  
 14 Q All right. Does that represent what you paid,  
 15 or how do you know whether you paid what for that crew's  
 16 equipment?  
 17 A I would have to go back to the --  
 18 Q What would you look at?  
 19 A Well, I'm looking at the front of the invoice  
 20 right now, page 2108, and that [REDACTED]  
 21 [REDACTED], and it doesn't match up with any -- with the  
 22 two numbers that are on that timesheet 2109. So I am  
 23 assuming that the numbers that are penciled in on the  
 24 timesheet are for the labor, not for the vehicles.  
 25 MR. REHWINKEL: Okay. Let me take just a

1 A Yes, sir.  
 2 Q Oh, and then above that, [REDACTED]  
 3 [REDACTED]  
 4 A Yes, sir.  
 5 Q -- [REDACTED]? And there's something at the  
 6 bottom called a [REDACTED]. Do you know if  
 7 that's associated with [REDACTED]?  
 8 A My understanding of [REDACTED]  
 9 [REDACTED].  
 10 Q Okay.  
 11 A It's [REDACTED] used on  
 12 construction sites.  
 13 Q Is it connected to the [REDACTED] or do they just  
 14 have the same --  
 15 A I don't think it's connected to the skidder.  
 16 Q All right. So let's go to the next page, and  
 17 it looks like this crew has time recorded for  
 18 Hurricane Irma and TECO from the 11th through the 14th;  
 19 is that right?  
 20 A Yes, sir.  
 21 Q But there's no time recorded after that?  
 22 A No, sir.  
 23 Q All right. Now, if this is the crew that was  
 24 associated with [REDACTED],  
 25 these dates would correspond to the time that that,

1 five-minute break here. I need to find an invoice.  
 2 MR. WAHLEN: Okay. We're going to go off the  
 3 record for about five minutes.  
 4 (Recess from 11:08 a.m. to 11:18 a.m.)  
 5 BY MR. REHWINKEL:  
 6 Q I'm going to hand you a document that is  
 7 pages 2174 through 2177 and ask you to take a look at  
 8 that. And this is a [REDACTED] invoice dated 9/17, and the  
 9 crew -- it looks like the crew foreman is [REDACTED].  
 10 [REDACTED]; is that right?  
 11 A Yes, sir.  
 12 Q And it's crew job 600-144. That's their  
 13 internal number probably?  
 14 A Yes, sir.  
 15 Q Let's go to the next page. Let's look at the  
 16 equipment that this crew has in their invoice. Do you  
 17 see a [REDACTED] on --  
 18 A Yes, sir.  
 19 Q Is that 62 hours, to the left there under  
 20 quantity, for that [REDACTED]?  
 21 A Okay.  
 22 Q Is that correct?  
 23 A Yes, sir.  
 24 Q And then a few lines down we see a [REDACTED]  
 25 [REDACTED]?

1 apparently, was being transported along with page -- in  
 2 the Exhibit 84?  
 3 A Yes, sir.  
 4 Q Now, do we know whether [REDACTED]'s crew  
 5 ever made it to Tampa? Would you have anything that  
 6 said whether crew 600 or department 600 made it?  
 7 A I don't have that.  
 8 Q Okay. Let's look at pages 2191 through 2195.  
 9 MR. REHWINKEL: Did we make that an exhibit?  
 10 We'll call this [REDACTED] Crew Documentation.  
 11 (Exhibit 85 was marked for identification.)  
 12 BY MR. REHWINKEL:  
 13 Q And I'm going to hand you what will be 86, and  
 14 that's Miscellaneous Expense Summary for [REDACTED]. If  
 15 you can take a look at that, the first and last page of  
 16 that document?  
 17 MR. WAHLEN: What were the numbers? I'm  
 18 sorry.  
 19 MR. REHWINKEL: 2191 through 2195.  
 20 (Exhibit 86 was marked for identification.)  
 21 MR. REHWINKEL: Let's go to the last page, 95.  
 22 All right. Stop there.  
 23 BY MR. REHWINKEL:  
 24 Q I want to ask you about 2195. And there's a  
 25 grand total, meals and hotels, [REDACTED]. Do you see



1 that?  
 2 A Yes, sir.  
 3 Q Was that amount paid to [REDACTED]?  
 4 A I believe it was.  
 5 Q What is the 10 percent plus cost, [REDACTED]?  
 6 What does that represent?  
 7 A I'd have to look back at the notes, but that's  
 8 [REDACTED].  
 9 [REDACTED].  
 10 Q Does anybody else do that?  
 11 A Yes, sir, they do.  
 12 Q There are invoices in here like that?  
 13 A Yes, sir.  
 14 Q Is that an SEE guideline?  
 15 A No, sir.  
 16 Q So all those meals, Outback and -- Outback and  
 17 Hooters, all -- we -- the customers get to pay an [REDACTED]  
 18 [REDACTED] for the privilege of feeding them there?  
 19 A Yes, sir.  
 20 Q Okay. Well, let's look at some of the other  
 21 privileges that are involved in that sheet.  
 22 On page 2194 on line 101 you'll see an Expedia  
 23 charge there?  
 24 A Yes, sir.  
 25 Q Do you know what that hotel stay was for?

1 Q All right. Just hold onto that and I want to  
 2 ask you about 2197 and ask you at the top there, there's  
 3 a receipt and it says "steak." And can you tell me the  
 4 date on this one?  
 5 A I'm not sure.  
 6 Q On the upper left under 204 -- oh, I'm sorry.  
 7 The receipt, it says "Frontier."  
 8 A Okay.  
 9 Q Is that a steakhouse on Sligh Avenue where you  
 10 work?  
 11 A I've never heard of it.  
 12 Q Okay. 9/15 at 8:09 p.m.; is that right?  
 13 A Yes, sir.  
 14 Q All right. And it's a [REDACTED] meal that somebody  
 15 wrote "steak" on it. Do you see that?  
 16 A Yes, sir.  
 17 Q Is this before they were released and during  
 18 work hours?  
 19 A 9/15, they hadn't been released yet, no, sir.  
 20 Q And it was what, 8:00 in the evening?  
 21 A Evening, yes.  
 22 Q They didn't knock off until 10:00 or 11:00,  
 23 right?  
 24 A That was a normal expectation, I believe.  
 25 Q And they added a [REDACTED] to that in

1 A No, sir.  
 2 Q Well, we'll go through the receipts here.  
 3 I'll have to find it in order, but I believe it's a  
 4 receipt for a hotel in [REDACTED].  
 5 TECO doesn't serve [REDACTED], do they?  
 6 A No, sir.  
 7 Q All right. Let's look at page 2196.  
 8 Actually, is that an exhibit? Did we give that exhibit  
 9 number? This will be [REDACTED] Expense Summary.  
 10 MR. WAHLEN: That was 86.  
 11 BY MR. REHWINKEL:  
 12 Q I want to ask you if that -- you can reference  
 13 this document 86. Is this a document that was paid,  
 14 this [REDACTED] with a [REDACTED] tip, [REDACTED]?  
 15 A It appears to.  
 16 Q Okay. Should that have been paid?  
 17 A I'm not sure of the circumstances behind this,  
 18 if they were preparing for travel and, you know, what  
 19 that company's policy is.  
 20 Q Does it show that it was paid or is that a  
 21 bill?  
 22 A This just shows that it was a bill.  
 23 Q Okay. So on that basis alone it shouldn't  
 24 have been paid, right?  
 25 A Right.

1 addition to the [REDACTED] tip?  
 2 A Yes, sir.  
 3 Q Page 2198 -- oh, and what's written on -- look  
 4 at that steak receipt there, if you don't mind. What's  
 5 the department number or the crew number there? Is it  
 6 204?  
 7 A There is a 204 on it.  
 8 Q All right. So let's look at the hotel receipt  
 9 on the next page there. Do you see 204 up at the top  
 10 there?  
 11 A Yes, sir.  
 12 Q And this is somebody named [REDACTED], right --  
 13 A Yes, sir.  
 14 Q -- written on there?  
 15 And this is a hotel bill. Where is this  
 16 hotel?  
 17 A Hammond, Louisiana.  
 18 Q All right. Now, you-all don't serve [REDACTED]  
 19 [REDACTED], right?  
 20 A No, sir.  
 21 Q What was the in and out date of this hotel?  
 22 A It was in on September 8th and out on the  
 23 10th.  
 24 Q Or the 11th?  
 25 A Or the 11th.

1 Q Okay. So this person spent three nights  
 2 there. Why would you expect -- would you expect a crew  
 3 to be sitting in [REDACTED] for three days in a hotel?  
 4 A It just depends on when they had to commit to  
 5 them to get them in safely.  
 6 Q Okay. So I'll show you an invoice, 2141 and  
 7 2142.  
 8 MR. WAHLEN: Charles, are we going to mark 96,  
 9 97 and 98 as an exhibit?  
 10 MR. REHWINKEL: I think what I'm going to do  
 11 is just make them -- I'm going to go through some  
 12 more and we'll just do a composite exhibit.  
 13 MR. WAHLEN: What did you just give him?  
 14 MR. REHWINKEL: 21 --  
 15 THE WITNESS: 41.  
 16 MR. REHWINKEL: 41.  
 17 MR. WAHLEN: Through what?  
 18 MR. REHWINKEL: 42.  
 19 BY MR. REHWINKEL:  
 20 Q Now, do you see a [REDACTED] on this one?  
 21 A Yes, sir.  
 22 Q And it's -- if you look in the crew-job  
 23 number, it says 20475?  
 24 A Yes, sir.  
 25 Q All right. So it would be reasonable to

1 Q Okay. Now, should this have been paid?  
 2 A Again, I'm not sure when we committed to this  
 3 company.  
 4 Q Well, let's look at this. Is this a bill or a  
 5 receipt?  
 6 A It looks like a bill.  
 7 Q Okay. Now, this guy handwrote a [REDACTED] tip on  
 8 there and I guess he claimed [REDACTED]. Which would you  
 9 have paid?  
 10 A If there's [REDACTED] --  
 11 Q [REDACTED]?  
 12 A Right. We would have paid [REDACTED].  
 13 Q [REDACTED]  
 14 A [REDACTED].  
 15 Q All right. But it shouldn't have been paid  
 16 because there's no evidence that the bill was paid; is  
 17 that right?  
 18 A Right.  
 19 THE WITNESS: Do you want to make that an  
 20 exhibit?  
 21 MR. REHWINKEL: Yes, we'll make that an  
 22 exhibit. Thank you.  
 23 MR. WAHLEN: By itself or part of the group?  
 24 MR. REHWINKEL: Yes, it's going to be part of  
 25 the -- put it in the stack?

1 assume that this crew is associated with that three-day  
 2 stay in [REDACTED]?  
 3 A Yes, sir.  
 4 Q And the steak on the 15th at 8:00 in the  
 5 afternoon -- in the evening?  
 6 A Yes, sir.  
 7 Q Okay. Let's go to the next page and rotate  
 8 that. All right. Let's look on the 15th for  
 9 [REDACTED]. Can you tell what hours he worked or  
 10 recorded?  
 11 A He recorded from 5:00 a.m. to 2200, 10:00 p.m.  
 12 Q Seventeen hours?  
 13 A Yes, sir.  
 14 Q And it appears that some of those hours he was  
 15 eating a steak on Sligh Avenue?  
 16 A Yes.  
 17 Q Okay. Do you know when he arrived in -- his  
 18 crew would have arrived in Florida?  
 19 A Without going back to storm notes, I wouldn't  
 20 know it off the top of my head.  
 21 Q Let's look at -- I want to ask you about this  
 22 page 2228. It looks like the top name is [REDACTED].  
 23 This is at Don's Seafood in [REDACTED] on what  
 24 date?  
 25 A It looks like it's marked 9/10.

1 MS. PONDER: You're not going to make an  
 2 exhibit right now?  
 3 MR. REHWINKEL: No.  
 4 MR. WRIGHT: Charles, the previous page we  
 5 were looking at, the time for 9/11 to 9/17, I  
 6 didn't get a page number on that.  
 7 MR. REHWINKEL: You mean the hotel bill?  
 8 MS. PONDER: You mean [REDACTED] hours worked?  
 9 I believe 2142.  
 10 MR. WRIGHT: It may have been 2142.  
 11 MR. REHWINKEL: Yes.  
 12 MR. WRIGHT: Okay.  
 13 MR. REHWINKEL: I want to make this an  
 14 exhibit. This will be [REDACTED] Crew and it  
 15 will be whatever the -- 87?  
 16 MS. PONDER: 87.  
 17 MR. REHWINKEL: [REDACTED] crew?  
 18 MR. WRIGHT: Can we go off for just a second?  
 19 MR. REHWINKEL: Sure.  
 20 (Exhibit 87 was marked for identification.)  
 21 (Discussion off the record.)  
 22 BY MR. REHWINKEL:  
 23 Q Let me show you 2296 and ask you if that was  
 24 paid and if it should have been paid.  
 25 A I'm fairly certain it was paid, but it looks

1 like a bill and not a final receipt.  
 2 Q Okay. So it shouldn't have been paid on the  
 3 basis of documentation?  
 4 A Yes, sir.  
 5 Q That was again --  
 6 A It needs to be challenged.  
 7 Q That's, again. [REDACTED] who did that on a  
 8 previous document, right?  
 9 A Yes, sir.  
 10 Q All right. Let me show you two pages, 2310  
 11 and 2311, and ask you to look at those. And you can  
 12 also refer to Exhibit 86 if you need to. And ask you to  
 13 tell me what this appears to be.  
 14 A It appears to be hotel rooms for  
 15 September 14th in [REDACTED].  
 16 Q [REDACTED] is between [REDACTED] or  
 17 somewhere in that area?  
 18 A Yes, sir.  
 19 Q Okay. And checking out on the 15th?  
 20 A Yes, sir.  
 21 Q How many days? Just one day?  
 22 A Yes, sir.  
 23 Q And on Exhibit 86, can you see that charge  
 24 included in the total?  
 25 A Yes, sir.

1 Q Okay. Okay. Well, we'll call him [REDACTED].  
 2 for now. I think we might stumble on his name. Oh,  
 3 here it is. Oh, I've been saying [REDACTED].  
 4 Let's look at page 2194, and look over there.  
 5 You'll see [REDACTED] and he's associated with 209,  
 6 right?  
 7 A Yes, sir.  
 8 Q And you see him associated with [REDACTED],  
 9 [REDACTED]; Best Western on the 15th; Salem's Gyros,  
 10 G-Y-R-O-S in Tampa on the 15th; the Red Zone in  
 11 Mississippi on the 14th; he's at Denny's in Midway,  
 12 Florida on the 15th; he's -- we just did [REDACTED] on the  
 13 14th; and then he's at Cooters on the 17th.  
 14 So he's getting into -- he gets to Tampa on  
 15 the 17th, but he's around Tallahassee on the 15th, it  
 16 looks like. And then he makes it into Tampa, it looks  
 17 like, in order -- at the time to get a gyro on the 15th?  
 18 A Yes, sir.  
 19 Q Did this guy do any work for TECO?  
 20 A I have no idea what his position was.  
 21 Q And I guess [REDACTED],  
 22 [REDACTED], if you look at 2316. And he's in [REDACTED]  
 23 on the 14th, it looks like?  
 24 A Yes, sir.  
 25 Q All right. Let's look at 21 -- I'm sorry --

1 Q How were these guys helping TECO over there in  
 2 [REDACTED] on the 15th?  
 3 A I'm not sure.  
 4 Q Let me --  
 5 A I know that we had crews traveling different  
 6 times.  
 7 Q Well, let's look at page 2314. I'll just give  
 8 you 2314 and 2315. And let's look at 2314 first. We  
 9 see a receipt for Cooters in Clearwater Beach and it  
 10 says department 209 on it? Or 209. That's crew 209, I  
 11 would assume, for [REDACTED] Do you see that?  
 12 A Yes, sir.  
 13 Q What's the date on that?  
 14 A 9/17.  
 15 Q Okay. Let's go to -- and then we see  
 16 crew 209, a receipt on 9/14 in [REDACTED].  
 17 [REDACTED] at 1:33 on the 14th?  
 18 A Yes, sir.  
 19 Q All right. Let's go to the next page, and we  
 20 see [REDACTED], something like that? I  
 21 think you'd have had to read it off of the -- I think I  
 22 have it highlighted on 86. Can you read his name? Or  
 23 is it on the hotel bill? Let me look at 86 and I'll  
 24 direct you to it.  
 25 A I'm not sure I'm seeing it.

1 2318, and this is a -- I don't think it's a bill. It's  
 2 a receipt. It's not a receipt. It's a bill, right?  
 3 A Yes, sir.  
 4 Q [REDACTED], he's in crew 219 and he's at  
 5 the Channelside Hooters. That's just down the street  
 6 here, isn't it?  
 7 A Yes, sir.  
 8 Q All right. And it's on the 14th at 9:52 p.m.?  
 9 A Yes, sir.  
 10 Q And this shouldn't have been paid just on the  
 11 basis that it's not proof of cost, right?  
 12 A Correct. Yes, sir.  
 13 Q But would you speculate -- let's don't  
 14 speculate. Would you assume that if we looked at his  
 15 timesheet, that he was recording time sometime after  
 16 9:52?  
 17 A Or close to it.  
 18 Q Okay. But he was at Hooters while he was  
 19 supposed to have been working, right?  
 20 A Yes, sir.  
 21 Q Let's look at [REDACTED] again on page 2319.  
 22 Now, is this a bill or a receipt?  
 23 A This looks like a bill that's been marked on.  
 24 Q All right. So the total is [REDACTED]  
 25 [REDACTED], right?

1 A Yes, sir.  
 2 Q And then at 9:55 p.m., he's at the Hooters on  
 3 East Adamo Drive in Tampa, right?  
 4 A Yes, sir.  
 5 Q All right. Probably he and his crew -- there  
 6 are several people in the Hooters there, right?  
 7 A Yes, sir.  
 8 Q Crew 248. [REDACTED]  
 9 [REDACTED] while they were  
 10 at Hooters, right?  
 11 A I would have to check their timesheets. Yes,  
 12 sir.  
 13 Q Okay. Let's look at 2320. This is crew 600  
 14 again and this is -- it says, [REDACTED]." And  
 15 they're in Reddick, Florida on the 12th.  
 16 This is crew 600 that we saw not recording  
 17 time after the 14th, right?  
 18 A Yes, sir.  
 19 Q So let's look at -- Reddick is near Ocala,  
 20 right?  
 21 A I'm not sure.  
 22 Q Okay. It's in the 352 area code. You-all  
 23 don't serve that, do you?  
 24 A Yes, sir, we do serve -- we don't serve  
 25 Reddick or Ocala, but we do serve part of the 352 area

1 Q It's just west of [REDACTED]. Will you  
 2 accept my representation on that?  
 3 A Yes, sir.  
 4 Q All right. And so this couldn't be  
 5 demobilization because they're, A, going in the wrong  
 6 direction, and B, it looks like they're in [REDACTED]  
 7 [REDACTED], right?  
 8 A Right.  
 9 Q All right. Let's look at page 2331. Now,  
 10 this is somebody named [REDACTED], right, on the right-hand  
 11 side?  
 12 A Yes, sir.  
 13 Q And [REDACTED] has a 101 by his name, right?  
 14 A Yes, sir.  
 15 Q Which is the same number we saw on the receipt  
 16 for the evening in [REDACTED], and he's eating at a Sonny's  
 17 in Winter Haven, which is in your territory, right?  
 18 A Yes, sir.  
 19 Q On the 16th it looks like. And can you read  
 20 the time on that?  
 21 A 1:10 p.m.  
 22 Q Okay. So he's had lunch at Winter Haven and  
 23 one would surmise on his way down to the [REDACTED]  
 24 [REDACTED] in [REDACTED] right?  
 25 A Yes, sir.

1 code.  
 2 Q Okay. That's on the 14th in Reddick, and then  
 3 we have 600 in [REDACTED] on the 14th at 10:13 a.m.,  
 4 right?  
 5 A Yes, sir.  
 6 Q All right. So it looks like that -- somebody  
 7 in that crew [REDACTED] right?  
 8 A It would almost appear that way.  
 9 Q All right. Okay. I finally got back to that  
 10 \$ [REDACTED] charge that you see on the 16th on Exhibit 86.  
 11 I want to hand you page 2330 and ask you if you paid  
 12 this charge.  
 13 A Yes, sir.  
 14 Q And this is the [REDACTED] on  
 15 the night of the 16th and 17th; is that right?  
 16 A Yes, sir.  
 17 Q All right. Let's scroll up to the top. This  
 18 is crew 101 or 101. This shouldn't have been paid,  
 19 should it?  
 20 A I wouldn't think, unless they were  
 21 demobilizing back home, and that should have been  
 22 probably challenged.  
 23 Q Yeah. But [REDACTED] is in [REDACTED] territory in  
 24 [REDACTED], isn't it?  
 25 A I'm not sure where [REDACTED] is at.

1 Q All right. Let's look at the one to the left  
 2 of that, Sonny's. Can you tell me either the date or  
 3 the time of that one?  
 4 A Well, it's a continuation of the same receipt.  
 5 It's just one long receipt. So it would be  
 6 September 16th at 1:00 p.m.  
 7 Q Okay. So that's [REDACTED] in Winter Haven on that  
 8 day?  
 9 A Yes, sir.  
 10 Q Okay. Let's look at page 2338.  
 11 A Did you want this as part of this?  
 12 Q Yes. We're going to keep all of that for one  
 13 big exhibit.  
 14 All right. This is Smokin' Aces Steakhouse in  
 15 Plant City, which is in your territory. And we see 209.  
 16 That's [REDACTED]'s crew?  
 17 COURT REPORTER: I'm sorry. [REDACTED] --  
 18 THE WITNESS: [REDACTED]  
 19 BY MR. REHWINKEL:  
 20 Q Thank you. My mistake.  
 21 All right. Let's go look at the bottom of  
 22 this. So we see his name, [REDACTED] and  
 23 [REDACTED] somebody. And this is [REDACTED]  
 24 before the tip is added and it's September 16th at  
 25 10:24 p.m.?

1 A Yes, sir.  
 2 Q All right. So this crew was eating while they  
 3 probably were charging time, right?  
 4 A You'd have to check their timesheets, but  
 5 probably.  
 6 Q Okay. Do you know what time [REDACTED] was  
 7 released? I'll hand you this, POD 14.  
 8 A We have two different release times. One is  
 9 9/13, but the other was 9/15.  
 10 Q On what date?  
 11 A 9/15, 1627.  
 12 Q September 15th?  
 13 A Yes, sir.  
 14 Q And then what was the other date?  
 15 A September 13th.  
 16 Q Okay. So we should probably look at these  
 17 invoices a little closer to see if there were more  
 18 payments for dates after the 15th, right?  
 19 A Yes, sir.  
 20 Q Okay. So in that regard, let me show you 2344  
 21 and ask you if the Longhorn bill on the right should  
 22 have been paid at 7:49 p.m. on the 17th.  
 23 A It doesn't appear that it should have.  
 24 Q Okay. Now, is this a bill or a receipt? Oh,  
 25 it looks like it's paid, right? Okay. But it's after

1 Q All right. Let's look at 2349, and let's go  
 2 over here to the right. [REDACTED] this is on  
 3 the 21st. Now, this is for [REDACTED] and it says --  
 4 number 57 is the identifier. This shouldn't have been  
 5 paid, right?  
 6 A No, sir.  
 7 Q [REDACTED] that's not in your territory.  
 8 To the left of that, we see a Ruby Tuesday on  
 9 the 17th. That shouldn't have been paid, right?  
 10 A No, sir.  
 11 Q All right. So we'll give you 2350 and ask you  
 12 if this was paid and it shouldn't have been paid.  
 13 You-all don't serve [REDACTED] right?  
 14 A No, sir.  
 15 Q And the 17th through the 18th is after  
 16 release?  
 17 A Yes, sir.  
 18 Q And I believe we'll see that [REDACTED] --  
 19 A Yes, sir.  
 20 Q -- [REDACTED]. All right.  
 21 All right. Look at 2351 and tell me if you  
 22 can -- tell me what that is for.  
 23 A It looks like groceries to me.  
 24 Q Yeah, it looks like somebody had a cookout,  
 25 doesn't it?

1 release, right?  
 2 A Yes, sir.  
 3 Q All right. Let's look at 2345. This is  
 4 [REDACTED] again, right?  
 5 A Yes, sir.  
 6 Q And he's eating on the 16th at 2:34 p.m. at  
 7 Applebee's in Winter Haven, right?  
 8 A Yes, sir.  
 9 Q Now, is this a bill or a receipt?  
 10 A It looks like it's a bill duplicate.  
 11 Q Okay. So it says, "Total Due," and he  
 12 generously added a [REDACTED] would be what  
 13 was paid?  
 14 A Yes, sir.  
 15 Q And you would have paid this, right?  
 16 A Yes, sir.  
 17 Q All right. It shouldn't have been paid,  
 18 though, right?  
 19 A It doesn't appear to be.  
 20 Q Now let's look at 2346. This is a bill, not a  
 21 receipt?  
 22 A Yes, sir.  
 23 Q 8951 is written down. So you would have paid  
 24 that amount probably on September 16th after release?  
 25 A Yes, sir.

1 A Yes, sir.  
 2 Q And it's on the 17th at 12:30?  
 3 A Yes, sir.  
 4 Q All right. Let's go to the top. This is 101  
 5 again, right? This is the same guy that went down to  
 6 [REDACTED], or whatever it is,  
 7 [REDACTED]. Let's look at 2355 and see if we see  
 8 [REDACTED] again.  
 9 A Yes, sir.  
 10 Q All right. What's he doing on -- in this  
 11 receipt here?  
 12 A It looks like a meal at [REDACTED].  
 13 Q Well, it says, [REDACTED]"  
 14 A Yes.  
 15 Q And so he's down in [REDACTED], which is  
 16 [REDACTED] right?  
 17 A Yes, sir.  
 18 Q [REDACTED]. Okay.  
 19 All right. We'll just do one last one of  
 20 these, 2371. The Winghouse bill on the 17th at 7:15,  
 21 that's just a bill, not a receipt, right?  
 22 A Yes, sir.  
 23 Q So they added a [REDACTED] tip and it was -- so it's  
 24 not a receipt and it's well after release, right?  
 25 A Yes.

1 Q It shouldn't have been paid? Okay.  
 2 So I guess I've just been through a sample of  
 3 the [REDACTED] receipts that are in that there. They were  
 4 not scrutinized like they should have been, right?  
 5 A No, sir.  
 6 Q In addition to that, this crew submitted  
 7 receipts for costs incurred after they were released and  
 8 costs incurred while they should have been working,  
 9 right?  
 10 A Yes, sir.  
 11 Q All right. So if you hand me all of those,  
 12 I'll read out the numbers and we'll just make a one --  
 13 MR. BEASLEY: Charles, we're getting a lot of  
 14 feedback. I don't know if somebody needs to put  
 15 their phone on mute or --  
 16 MR. WAHLEN: There were a bunch of documents  
 17 that just made their way over the phone, Jim, and  
 18 scraping up against it, so --  
 19 MR. REHWINKEL: Are you okay now?  
 20 MR. BEASLEY: Got it. Thanks.  
 21 MR. REHWINKEL: Okay. Jeff, I'm going to  
 22 staple these together and read these pages into the  
 23 record. I think we've made sure we kept track of  
 24 the documents and not mixed them up.  
 25 So 2196, 2197, 2198, 2228, 2296, 2316, 2318,

1 BY MR. REHWINKEL:  
 2 Q Okay. Let's try to do this without paper.  
 3 [REDACTED] invoice 2678 and 2686.  
 4 MR. WAHLEN: And that --  
 5 MR. REHWINKEL: [REDACTED]  
 6 MR. WAHLEN: That exhibit was 88, right?  
 7 MR. REHWINKEL: Yes, sir.  
 8 BY MR. REHWINKEL:  
 9 Q Okay. Do you know why [REDACTED] billed 9/18  
 10 through 9/20. Did TECO pay to demobilize them?  
 11 A I'm not sure. It's possible. Yes, sir. We  
 12 paid to demobilize them.  
 13 Q Okay. [REDACTED].  
 14 There summaries for labor and other charges that were  
 15 provided in this -- to support this invoice. Is this  
 16 one that we got some supplemental support on?  
 17 A I believe you would have received  
 18 supplemental.  
 19 Q Okay. And [REDACTED] 3706 to 3818, did we get  
 20 supplemental documentation for them?  
 21 A You should have received it. Also, we can  
 22 check this stack.  
 23 Q Okay. Don't worry about it. We'll accept  
 24 that. We just haven't had time to go through that  
 25 documentation yet.

1 2319, 2320, 2314, 2315, 2310 and 2311, I got those  
 2 out of order. 2330, 2331, 2338, 2344, 2345, 2346,  
 3 2349, 2350, 2351, 2355 and 2371. And we'll call  
 4 that [REDACTED] Miscellaneous Expenses.  
 5 MR. WRIGHT: Charles, in there I also have  
 6 2310 and 2311.  
 7 MR. REHWINKEL: Yes, I had those out of order,  
 8 so that's what I meant. So I'm going to put them  
 9 back in the right order.  
 10 MR. MOYLE: Could you go through these page  
 11 numbers again? I'm sorry. We didn't catch them.  
 12 You moved pretty fast.  
 13 MR. REHWINKEL: Yes, I'll do that.  
 14 All right. We're starting at 2196, 2197,  
 15 2198, 2228, 2296, 2310, 2311, 2316, 2318, 2319,  
 16 2320, 2314, 2315, 2330, 2331, 2338, 2344, 2345,  
 17 2346, 2349, 2350, 2351, 2355, 2371.  
 18 And that's 88.  
 19 MR. WAHLEN: Did you have 2141 and 42 in  
 20 there?  
 21 MS. PONDER: I have that as Exhibit 87, the  
 22 [REDACTED] crew.  
 23 MR. WAHLEN: Okay.  
 24 (Exhibit 88 was marked for identification.)  
 25

1 A It's an amount.  
 2 Q It is.  
 3 A I'm really impressed that we've gone this  
 4 depth.  
 5 Q It was a lot of hours.  
 6 [REDACTED], did TECO pay for  
 7 demobilization for them?  
 8 A [REDACTED].  
 9 Q Oh, 3832 is the invoice.  
 10 A [REDACTED]  
 11 Q Oh, [REDACTED] I apologize. I  
 12 wrote that down wrong. There is a -- [REDACTED] is the  
 13 one.  
 14 Anyway, so on 3832, that's [REDACTED]  
 15 [REDACTED] Did TECO pay to demobilize them?  
 16 A I'd have to check their last day or their  
 17 release date. Yes, sir. Actually, we kept them over a  
 18 couple of days. They were one of the last companies  
 19 released 9/20.  
 20 Q Okay. So they were released on 9/20 and then  
 21 you paid for the travel through the 22nd?  
 22 A Yes.  
 23 Q Okay. Was there supplemental information  
 24 provided for them?  
 25 A It should have been.

1 Q In the -- okay.  
 2 [REDACTED]  
 3 [REDACTED]  
 4 A No, sir.  
 5 Q Okay. Is the [REDACTED] an hour rate that they  
 6 charged something that was reasonable?  
 7 A That was -- well, that was, [REDACTED]  
 8 [REDACTED]  
 9 [REDACTED]  
 10 [REDACTED]  
 11 [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED]  
 14 [REDACTED]  
 15 Q That's quite a bit higher than what most  
 16 people charge, right?  
 17 A Yes, sir.  
 18 Q Do you know why [REDACTED] supplied  
 19 customer service representatives?  
 20 A That would be somebody else in the company,  
 21 but I think that they -- our call center became  
 22 overwhelmed and so they contracted out, basically, part  
 23 of that service.  
 24 Q So is that standard in storm restoration for  
 25 other utilities to provide --

1 THE WITNESS: And [REDACTED]  
 2 [REDACTED]  
 3 MR. REHWINKEL: Okay. I don't know. Do we  
 4 know the late-filed exhibit we asked for about  
 5 Con Ed?  
 6 Jeff, I just think if we just ask for that as  
 7 part of the same exhibit -- if it's easier we can  
 8 just make it --  
 9 MR. WRIGHT: Are we off, Charles, or on?  
 10 MR. REHWINKEL: We can stay on or --  
 11 MR. WRIGHT: I've got -- I don't care. I've  
 12 got --  
 13 MR. REHWINKEL: Let's go off.  
 14 (Discussion off the record.)  
 15 MR. REHWINKEL: 89 will be [REDACTED]  
 16 Timesheet Summary, or let's call it just [REDACTED]  
 17 [REDACTED] Labor Cost Summary. And then  
 18 we want an explanation of 25-hour billing on this  
 19 example and any other erroneous -- strike the word  
 20 "erroneous" -- any other reconciliation or  
 21 adjustments to [REDACTED] time. That will  
 22 be a late-filed. So we'll just call it, for a  
 23 short title, [REDACTED] Labor  
 24 Reconciliation.  
 25 MR. WAHLEN: And the reference there is 3850?

1 A It can be, yes.  
 2 Q Now, do they have to be trained up on how to  
 3 answer the phone or what to say?  
 4 A I'm sure they're given scripts, but again,  
 5 that's somebody else in the company.  
 6 Q Okay. So do you know whether these service  
 7 reps were released on the 13th?  
 8 A I have no idea.  
 9 Q Okay. Is this something that we should ask  
 10 Ms. Young?  
 11 A Possibly. I'm not even sure --  
 12 Q Not you?  
 13 A -- she would know.  
 14 Q All right. Let's look at 3850 on the screen,  
 15 and let's look on [REDACTED] on the 10th. [REDACTED]  
 16 [REDACTED]  
 17 [REDACTED]. Is that  
 18 something we're going to get some information on?  
 19 A We can try to provide that.  
 20 MR. REHWINKEL: Did we ask about that  
 21 yesterday?  
 22 MR. SCHULTZ: Was it the same one?  
 23 THE WITNESS: I think you asked about for  
 24 [REDACTED]  
 25 MR. REHWINKEL: Okay. Yeah.

1 MR. REHWINKEL: Yes.  
 2 (Exhibit 89 to be marked and produced as a  
 3 late-filed exhibit.)  
 4 BY MR. REHWINKEL:  
 5 Q Let's look at 3996 and 3997. We can start at  
 6 3996.  
 7 MR. REHWINKEL: Scroll down a little bit.  
 8 Let's go to the next page. All right. Stop and  
 9 let's look at the comments.  
 10 BY MR. REHWINKEL:  
 11 Q So was this crew -- when was this crew  
 12 released, [REDACTED]  
 13 A We had several different [REDACTED], but it looks  
 14 like they were released on September 17th.  
 15 Q All right. So the notes on --  
 16 MR. REHWINKEL: Move the notes up into the  
 17 full part of the screen, right there.  
 18 BY MR. REHWINKEL:  
 19 Q On September 16th this foreman here, it says  
 20 he -- from 6:00 to 11:00 he went to [REDACTED] and had a  
 21 safety meeting. Loaded up material and ran out of time  
 22 to work. It was 11:00 p.m. time crew got back to motel  
 23 after eating.  
 24 So should he have been adjusting time, not  
 25 charged TECO for being at [REDACTED]

1 A No, sir, I would not think.  
 2 Q He would be charging TECO for that time?  
 3 A He should be charging [REDACTED] for that time.  
 4 Q Okay. But he should have adjusted -- if he  
 5 recorded time during that time he was at [REDACTED] and ran  
 6 out of time to work, he shouldn't have charged TECO for  
 7 that, right?  
 8 A Yes, sir.  
 9 Q Okay.  
 10 MR. REHWINKEL: 4025 --  
 11 MR. WAHLEN: You want to mark that?  
 12 MR. REHWINKEL: Yes, I would like to mark  
 13 those two pages, 4025 and 4026.  
 14 MR. WAHLEN: 3996 and 3997?  
 15 MR. REHWINKEL: I'm sorry. I'm getting ahead  
 16 of myself. 3996 and 3997, and we'll call that [REDACTED]  
 17 Timesheet. I guess I better get a copy of it out.  
 18 (Exhibit 90 was marked for identification.)  
 19 BY MR. REHWINKEL:  
 20 Q Now let's go to 425. Can you tell me why [REDACTED]  
 21 [REDACTED]  
 22 A No, sir.  
 23 Q Okay. Is that something that would have been  
 24 negotiated, or they just would have said, "Here's the  
 25 way it is"?

1 A Yes, sir.  
 2 Q Okay. Are you familiar with [REDACTED]  
 3 A [REDACTED]  
 4 Q Let me show you 4272, and can you -- 4272.  
 5 Okay. Let's look at the note at the bottom of this  
 6 page. It shows this timesheet and these crew members  
 7 [REDACTED].  
 8 [REDACTED].  
 9 [REDACTED]  
 10 A It was -- this is the first time that I had  
 11 seen this and that was a challenge that we had.  
 12 Q You challenged that?  
 13 A Yes, sir.  
 14 Q What was the resolution with that?  
 15 A [REDACTED]  
 16 Q Okay. All right. We could go through some  
 17 more receipts, but I think we've, sort of, exhausted  
 18 everybody's patience on that and we need to move --  
 19 MR. WAHLEN: I can go back for the Sunday  
 20 night service. I just couldn't have lunch.  
 21 MR. REHWINKEL: No, I want to stop here and  
 22 why don't we take an hour and then we can come back  
 23 and assess where we are with Beth and Jeff.  
 24 MR. WAHLEN: Okay. So are you ready to  
 25 terminate, end, Wes?

1 A They would have probably said, "Here's the way  
 2 it is."  
 3 Q All right. [REDACTED]  
 4 [REDACTED]  
 5 A Not that I'm aware of.  
 6 Q So I'm going to show you 4013 through 4019. I  
 7 thought I was. I'll show you those.  
 8 Do you know whether this utility -- when this  
 9 utility arrived in TECO's service territory ready to  
 10 work?  
 11 A They mobilized, it looks like, on the 12th.  
 12 I'm not sure without looking at notes what the actual  
 13 arrival date is.  
 14 Q So they came from [REDACTED]  
 15 A Yes, sir.  
 16 Q And it probably takes [REDACTED] to get  
 17 down from [REDACTED]  
 18 A Yes, sir.  
 19 Q What date did you say? They mobilized on the  
 20 12th?  
 21 A Yes, sir.  
 22 Q Do you know why they billed through the 19th?  
 23 A We released them to home because they were  
 24 expecting a storm.  
 25 Q Okay. So you paid for them to demobilize?

1 MR. REHWINKEL: I am. Does anybody else have  
 2 any questions?  
 3 MR. WAHLEN: Jim, is there anybody in  
 4 Tallahassee who has questions of Wes?  
 5 MR. SCHRADER: This is Kurt with PSC. I know  
 6 we didn't cross-notice, but I want to ask this one  
 7 quick question, but I can wait until the end if we  
 8 did.  
 9 MR. WAHLEN: Well, I think we're at the end.  
 10 Why don't you ask your question. I had one or two.  
 11 MR. SCHRADER: Okay. I'm going to ask it now,  
 12 then.  
 13 CROSS-EXAMINATION  
 14 BY MR. SCHRADER:  
 15 Q You mentioned yesterday that you didn't think  
 16 there was any fraud involved. Given what, you know,  
 17 Charlie has shown you in the last couple of days, has  
 18 your opinion on that changed at all?  
 19 A Yes, sir. It has.  
 20 Q Okay. How has it changed?  
 21 A Well, it appears that people sought to  
 22 purposely mislead Tampa Electric on charges that were  
 23 made.  
 24 MR. SCHRADER: Okay. That's all I have.  
 25 Thank you.



1 MR. WAHLEN: Charles, I just had a couple of  
 2 questions.  
 3 MR. REHWINKEL: Okay.  
 4 CROSS-EXAMINATION  
 5 BY MR. WAHLEN:  
 6 Q Mr. Rehwinkel asked you some questions about  
 7 some radios and walkie-talkies that were purchased by  
 8 [REDACTED]s for use in the restoration and the  
 9 company paid for them. Do you remember that?  
 10 A Yes, sir.  
 11 Q Is it possible that [REDACTED]  
 12 [REDACTED]  
 13 [REDACTED] --  
 14 A Yes, sir.  
 15 Q -- they might need --  
 16 A [REDACTED]  
 17 Q So there might be an explanation for that?  
 18 A Yes, sir.  
 19 Q Okay. And I guess just a general question  
 20 here. Mr. Rehwinkel and the Office of Public Counsel  
 21 have gone through very thoroughly and identified a bunch  
 22 of costs that look like they shouldn't have been paid.  
 23 A Yes, sir.  
 24 Q And you've been giving your assessment just by  
 25 looking at the documents.

1 when we ordered for expedited and we would like to  
 2 have it expedited, but to reiterate, it will be  
 3 expedited and it will be provided under the terms  
 4 that we discussed at the outset.  
 5 MR. WAHLEN: Right.  
 6 MR. REHWINKEL: Which will be anybody that --  
 7 no one shall receive a copy of this document until  
 8 e-mail confirmation is sent to the court reporter  
 9 approving it.  
 10 MR. WAHLEN: That will be fine.  
 11 Is it worthwhile to go over the list of  
 12 late-filed exhibits just to make sure we're all on  
 13 the same page or are we comfortable that we've got  
 14 them? Are you good?  
 15 MS. PONDER: I'm good.  
 16 MR. WAHLEN: Okay.  
 17 MR. REHWINKEL: I think we're okay.  
 18 MR. WAHLEN: Okay. I think we are too. I  
 19 just asked that in the abundance of caution.  
 20 MR. REHWINKEL: I appreciate it.  
 21 (The deposition concluded at 12:35 p.m.)  
 22  
 23  
 24  
 25

1 A Correct.  
 2 Q Is it at least possible conceptually that if  
 3 you go back and look at them further, some of those  
 4 might be justifiable?  
 5 A Yes, sir, and I intend to look into those.  
 6 Q But based -- the testimony you've given today  
 7 is based on your assessment of the situation today and  
 8 the information you have from them?  
 9 A Yes, sir.  
 10 MR. WAHLEN: Okay. That's all I have.  
 11 MR. WRIGHT: Before we go off, did you mark  
 12 any more of those last documents? 4025-26, 4013  
 13 through 4019 or 4272? Did you mean to mark those  
 14 as exhibits, Charles?  
 15 MR. REHWINKEL: No, I'm good.  
 16 MR. WRIGHT: Okay. That's all. Mine is  
 17 correct. Thank you, y'all.  
 18 MR. REHWINKEL: Thank you very much. You're  
 19 going to read and sign.  
 20 MR. WAHLEN: We will read and sign, yes.  
 21 MR. REHWINKEL: And thank you, Mr. Caldwell,  
 22 for your patience and your forthright testimony. I  
 23 appreciate that.  
 24 Before we go off the record, the Public  
 25 Counsel is -- would like a copy -- we had asked

1 CERTIFICATE OF OATH  
 2 STATE OF FLORIDA )  
 3 COUNTY OF HILLSBOROUGH )  
 4  
 5  
 6 I, the undersigned authority, certify that  
 7 WESLEY WILLIAM CALDWELL personally appeared before me  
 8 and was duly sworn.  
 9 WITNESS my hand and official seal this 14th  
 10 day of August, 2018.  
 11  
 12  
 13  
 14  
 15  
 16 \_\_\_\_\_  
 17 ANN S. BEILSTEIN, RPR  
 18 Notary Public  
 19 State of Florida  
 20 My Commission Expires 10/31/2020  
 21 Commission No. GG 037843  
 22  
 23  
 24  
 25

1 CERTIFICATE OF REPORTER  
 2 STATE OF FLORIDA )  
 3 COUNTY OF HILLSBOROUGH )  
 4  
 5 I, Ann S. Beilstein, Registered Professional  
 6 Reporter, certify that I was authorized to and did  
 7 stenographically report the foregoing deposition; that  
 8 a review of the transcript was reserved; and that the  
 9 transcript is a true record of the testimony given by  
 10 the witness.

11 I further certify that I am not a relative,  
 12 employee, attorney, or counsel of any of the parties,  
 13 nor am I a relative or employee of any of the parties'  
 14 attorneys or counsel connected with the action, nor am  
 15 I financially interested in the action.

16 Dated this 14th day of August, 2018.

17 \_\_\_\_\_  
 18 Ann S. Beilstein, RPR  
 19  
 20  
 21  
 22  
 23  
 24  
 25

1 PLEASE ATTACH TO THE DEPOSITION OF WESLEY WILLIAM  
 2 CALDWELL, TAKEN ON AUGUST 9, 2018, IN RE: Petition for  
 3 recovery of costs associated with named tropical systems  
 4 during the 2015, 2016, and 2017 hurricane seasons and  
 5 replenishment of storm reserve subject to final true-up,  
 6 Tampa Electric Company

7 PAGE LINE CORRECTION AND REASON THEREFOR  
 8  
 9  
 10  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18

19 I HAVE READ THE FOREGOING PAGES AND, EXCEPT FOR ANY  
 20 CORRECTIONS OR AMENDMENTS INDICATED ABOVE, I HEREBY  
 21 SUBSCRIBE TO THE ACCURACY OF THIS TRANSCRIPT.

22 \_\_\_\_\_ DATE  
 23 WESLEY WILLIAM CALDWELL

24 \_\_\_\_\_ DATE  
 25 WITNESS TO SIGNATURE

TAMPA ELECTRIC COMPANY  
DOCKET NO. 20170271-EI

TAMPA ELECTRIC COMPANY  
LATE FILED DEPOSITION EXHIBIT  
DEPOSITION AUGUST 8-9, 2018

WES CALDWELL

REDACTED

Table of Contents

Wes Caldwell Late Filed Deposition Exhibit

EXHIBIT NO.	TITLE	PAGE
4	Mutual Assistance Agreements	1
30	Complete AEP Hotel Receipt Reconciliation	95
32	Complete AEP Final Time Sheets that are searchable with what time reporting codes mean and when Dan Collier worked.	96
35	Any reconciling adjustments for Con Ed Time Reports	97
37	Complete Reconciliation of Documents (520,120, 81, 121, 143)	98
61	Emera Affiliate Services Agreements that govern mutual assistance for service and payment	99
74	Complete reconciliation of 1353 and 1354 to Invoice	174
75	Supporting Invoice Detail for NS Power and Emera Utility Services	175
78	Identify which company the invoice on Exhibit 77 is for	176
79	Empire work for FPL	177

TAMPA ELECTRIC COMPANY  
DOCKET NO. 20170271-EI

89	Complete Orange and Rockland Labor Reconciliation	178
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**Late File Exhibit No. 4:** provide Mutual Assistance Agreements.

- A. Tampa Electric will provide the requested Bates stamped documents for immediate review by OPC, recognizing the proprietary nature of the confidential information provided. These documents are entitled to protection from public disclosure pursuant to Section 366.093, Florida Statutes, and will be provided subject to a Motion for a Temporary Protective Order.

**BATES STAMPED PAGES  
2 to 94  
ARE REDACTED**

**Late File Exhibit No. 30:** complete AEP Hotel Receipt Reconciliation.

- A.** Tampa Electric is working on the processing, review and organization of the cost data and associated information pertaining to restoration costs. On August 14, 2018, the company filed a motion of continuance to support the additional time needed to ensure the accuracy of the associated information pertaining to restoration costs. That motion was granted on August 15, 2018 by Order No. PSC-2018-0406-PCO-EI. Tampa Electric will file the Late File Exhibit when the review has been completed.



**Late File Exhibit No. 32:** complete AEP Final Time Sheets that are searchable with what time reporting codes mean and when Dan Collier worked.

- A.** Tampa Electric is working on the processing, review and organization of the cost data and associated information pertaining to restoration costs. On August 14, 2018, the company filed a motion of continuance to support the additional time needed to ensure the accuracy of the associated information pertaining to restoration costs. That motion was granted on August 15, 2018 by Order No. PSC-2018-0406-PCO-EI. Tampa Electric will file the Late File Exhibit when the review has been completed.

**Late File Exhibit No. 35:** any reconciling adjustments for Con Ed Time Reports.

- A.** Tampa Electric is working on the processing, review and organization of the cost data and associated information pertaining to restoration costs. On August 14, 2018, the company filed a motion of continuance to support the additional time needed to ensure the accuracy of the associated information pertaining to restoration costs. That motion was granted on August 15, 2018 by Order No. PSC-2018-0406-PCO-EI. Tampa Electric will file the Late File Exhibit when the review has been completed.

**Late File Exhibit No. 37:** complete Reconciliation of Documents (520,120, 81, 121, 143).

- A.** Tampa Electric is working on the processing, review and organization of the cost data and associated information pertaining to restoration costs. On August 14, 2018, the company filed a motion of continuance to support the additional time needed to ensure the accuracy of the associated information pertaining to restoration costs. That motion was granted on August 15, 2018 by Order No. PSC-2018-0406-PCO-EI. Tampa Electric will file the Late File Exhibit when the review has been completed.

**Late File Exhibit No. 61:** provide Emera Affiliate Services Agreements that govern mutual assistance for service and payment (Title: "Emera Mutual Assistance Agreement with TECO").

- A.** Tampa Electric will provide the requested Bates stamped documents for immediate review by OPC, recognizing the proprietary nature of the confidential information provided. These documents are entitled to protection from public disclosure pursuant to Section 366.093, Florida Statutes, and will be provided subject to a Motion for a Temporary Protective Order.

**BATES STAMPED PAGES  
100 to 173  
ARE REDACTED**

**Late File Exhibit No. 74:** complete reconciliation of 1353 and 1354 to Invoice.

- A.** Tampa Electric is working on the processing, review and organization of the cost data and associated information pertaining to restoration costs. On August 14, 2018, the company filed a motion of continuance to support the additional time needed to ensure the accuracy of the associated information pertaining to restoration costs. That motion was granted on August 15, 2018 by Order No. PSC-2018-0406-PCO-EI. Tampa Electric will file the Late File Exhibit when the review has been completed.

**Late File Exhibit No. 75:** supporting Invoice Detail for NS Power and Emera Utility Services.

- A.** Tampa Electric is working on the processing, review and organization of the cost data and associated information pertaining to restoration costs. On August 14, 2018, the company filed a motion of continuance to support the additional time needed to ensure the accuracy of the associated information pertaining to restoration costs. That motion was granted on August 15, 2018 by Order No. PSC-2018-0406-PCO-EI. Tampa Electric will file the Late File Exhibit when the review has been completed.

**Late File Exhibit No. 78:** identify which company the invoice on Exhibit 77 is for.

- A.** Exhibit No. 77 is from the from the invoice received from Emera Maine, specifically from the tab sheets of the Excel spreadsheet titled "EMERA Maine\_2017 Mutual Aid Billing TECO Project 894B.xlsx" and tabs labeled "Sheet 1" and "Inventory".



**Late File Exhibit No. 79:** did Empire work for FPL?

- A.** Yes, Empire was released by Tampa Electric on September 17, 2017 at 5:04 PM to go perform restoration assistance to Florida Power and Light.

**Late File Exhibit No. 89:** complete Orange and Rockland Labor Reconciliation.

- A.** Tampa Electric is working on the processing, review and organization of the cost data and associated information pertaining to restoration costs. On August 14, 2018, the company filed a motion of continuance to support the additional time needed to ensure the accuracy of the associated information pertaining to restoration costs. That motion was granted on August 15, 2018 by Order No. PSC-2018-0406-PCO-EI. Tampa Electric will file the Late File Exhibit when the review has been completed.

**TAMPA ELECTRIC COMPANY  
DOCKET NO. 20170271-EI  
OPC'S DEPOSITION  
WITNESS: CALDWELL  
LATE FILED DEPOSITION  
EXHIBIT NO. 4  
PAGE 1 OF 1  
FILED: AUGUST 22, 2018  
SUPPLEMENTED: FEBRUARY 11, 2019**

**Late File Exhibit No. 4:** provide Mutual Assistance Agreements.

- A.** Tampa Electric will provide the requested Bates stamped documents for immediate review by OPC, recognizing the proprietary nature of the confidential information provided. These documents are entitled to protection from public disclosure pursuant to Section 366.093, Florida Statutes, and will be provided subject to a Motion for a Temporary Protective Order.

Tampa Electric is providing the Mutual Assistance Agreements on the accompanying CD, recognizing the proprietary nature of the confidential information provided. These documents are entitled to protection from public disclosure pursuant to Section 366.093, Florida Statutes, and will be provided subject to a Motion for a Temporary Protective Order.

**TAMPA ELECTRIC COMPANY  
DOCKET NO. 20170271-EI  
OPC'S DEPOSITION  
WITNESS: CALDWELL  
LATE FILED DEPOSITION  
EXHIBIT NO. 30  
PAGE 1 OF 1  
FILED: AUGUST 22, 2018  
SUPPLEMENTED: FEBRUARY 11, 2019**

**Late File Exhibit No. 30:** complete AEP Hotel Receipt Reconciliation.

- A.** Tampa Electric is working on the processing, review and organization of the cost data and associated information pertaining to restoration costs. On August 14, 2018, the company filed a motion of continuance to support the additional time needed to ensure the accuracy of the associated information pertaining to restoration costs. That motion was granted on August 15, 2018 by Order No. PSC-2018-0406-PCO-EI. Tampa Electric will file the Late File Exhibit when the review has been completed.

Tampa Electric has completed the reconciliation of American Electric Power's ("AEP") six affiliate companies that provided restoration assistance to Tampa Electric for Hurricane Irma and the associated lodging expenses. Tampa Electric is providing the Excel spreadsheet with formulas intact on the accompanying CD and invoices that support this reconciliation, recognizing the proprietary nature of the confidential information provided. These documents are entitled to protection from public disclosure pursuant to Section 366.093, Florida Statutes, and will be provided subject to a Motion for a Temporary Protective Order. On the associated Excel spreadsheet, please see Tabs "D – Lodging" for each AEP affiliate.

**TAMPA ELECTRIC COMPANY  
DOCKET NO. 20170271-EI  
OPC'S DEPOSITION  
WITNESS: CALDWELL  
LATE FILED DEPOSITION  
EXHIBIT NO. 32  
PAGE 1 OF 1  
FILED: AUGUST 22, 2018  
SUPPLEMENTED: FEBRUARY 11, 2019**

**Late File Exhibit No. 32:** complete AEP Final Time Sheets that are searchable with what time reporting codes mean and when Dan Collier worked.

- A.** Tampa Electric is working on the processing, review and organization of the cost data and associated information pertaining to restoration costs. On August 14, 2018, the company filed a motion of continuance to support the additional time needed to ensure the accuracy of the associated information pertaining to restoration costs. That motion was granted on August 15, 2018 by Order No. PSC-2018-0406-PCO-EI. Tampa Electric will file the Late File Exhibit when the review has been completed.

Tampa Electric has completed the reconciliation of AEP's final time sheets for the six affiliate companies that provided restoration assistance to Tampa Electric for Hurricane Irma. Tampa Electric is providing the Excel spreadsheet with formulas intact on the accompanying CD and time sheets that support this reconciliation as provided in Late File Exhibit No. 30 of this set. On the associated Excel spreadsheet, please see Tabs "C.2 – Time Sheets - Labor" for each AEP affiliate for their time sheets and please see Tabs "C.1 – Rate Sheets" for each AEP affiliate which provides what the time reporting codes mean. On the invoices Tampa Electric received, an employee by the name of Dan Collier was not an employee of AEP that charged labor to Tampa Electric for providing restoration support during Hurricane Irma. Recognizing the proprietary nature of the confidential information provided. These documents are entitled to protection from public disclosure pursuant to Section 366.093, Florida Statutes, and will be provided subject to a Motion for a Temporary Protective Order.

**TAMPA ELECTRIC COMPANY  
DOCKET NO. 20170271-EI  
OPC'S DEPOSITION  
WITNESS: CALDWELL  
LATE FILED DEPOSITION  
EXHIBIT NO. 35  
PAGE 1 OF 1  
FILED: AUGUST 22, 2018  
SUPPLEMENTED: FEBRUARY 11, 2019**

**Late File Exhibit No. 35:** any reconciling adjustments for Con Ed Time Reports.

- A.** Tampa Electric is working on the processing, review and organization of the cost data and associated information pertaining to restoration costs. On August 14, 2018, the company filed a motion of continuance to support the additional time needed to ensure the accuracy of the associated information pertaining to restoration costs. That motion was granted on August 15, 2018 by Order No. PSC-2018-0406-PCO-EI. Tampa Electric will file the Late File Exhibit when the review has been completed.

Tampa Electric has completed the reconciliation of Con Ed's final time sheets that provided restoration assistance to Tampa Electric for Hurricane Irma. Tampa Electric is providing the Excel spreadsheet with formulas intact on the accompanying CD and time sheets that support this reconciliation, recognizing the proprietary nature of the confidential information provided. These documents are entitled to protection from public disclosure pursuant to Section 366.093, Florida Statutes, and will be provided subject to a Motion for a Temporary Protective Order. On the associated Excel spreadsheet, please see Tabs "C.2 – Time Sheets - Labor" for their time sheets and please see Tabs "C.1 – Rate Sheets" which provides what the time reporting codes mean.

**TAMPA ELECTRIC COMPANY  
DOCKET NO. 20170271-EI  
OPC'S DEPOSITION  
WITNESS: CALDWELL  
LATE FILED DEPOSITION  
EXHIBIT NO. 37  
PAGE 1 OF 1  
FILED: AUGUST 22, 2018  
SUPPLEMENTED: FEBRUARY 11, 2019**

**Late File Exhibit No. 37:** complete Reconciliation of Documents (520,120, 81, 121, 143).

- A.** Tampa Electric is working on the processing, review and organization of the cost data and associated information pertaining to restoration costs. On August 14, 2018, the company filed a motion of continuance to support the additional time needed to ensure the accuracy of the associated information pertaining to restoration costs. That motion was granted on August 15, 2018 by Order No. PSC-2018-0406-PCO-EI. Tampa Electric will file the Late File Exhibit when the review has been completed.

Tampa Electric has completed the reconciliation of the following documents from the company's Response to OPC's Fifth set of Interrogatories, Interrogatory No. 76, Filed July 17, 2018:

- 520 of 5,573 (Preliminary Bill – AEP, six affiliates)
- 120 of 5,573 (Final Timesheets – AEP, Public Service of Oklahoma)
- 81 of 5,573 (Final Per Diem Meals – AEP, Public Service of Oklahoma)
- 121 of 5,573 (Outside Services – AEP, Ohio Power Company)
- 143 of 5,573 (Employee Expenses – AEP, Public Service of Oklahoma)

Tampa Electric is providing the Excel spreadsheet with formulas intact on the accompanying CD and time sheets that support this reconciliation as provided in Late File Exhibit No. 30 of this set. On the associated Excel spreadsheet,

- For document 520, please see Tab "B – Summary Expenses"
- For document 120, please see Tab "C.2 – Time Sheets – Labor (PSO)" for their time sheets and please see Tab "C.1 – Rate Sheets (PSO)".
- For document 81, please see Tabs "F – Meals (PSO)" and "G – Per Diem (PSO)".
- For document 121, please see Tab "H – Other (OP)" rows 46 and 47 for Aerotek transportation.
- For document 143, please see Tabs "F – Meals (PSO)", "G – Per Diem (PSO)", and "H – Other (PSO)".

**TAMPA ELECTRIC COMPANY  
DOCKET NO. 20170271-EI  
OPC'S DEPOSITION  
WITNESS: CALDWELL  
LATE FILED DEPOSITION  
EXHIBIT NO. 37  
PAGE 1 OF 1  
FILED: AUGUST 22, 2018  
SUPPLEMENTED: FEBRUARY 11, 2019**

Recognizing the proprietary nature of the confidential information provided. These documents are entitled to protection from public disclosure pursuant to Section 366.093, Florida Statutes, and will be provided subject to a Motion for a Temporary Protective Order.



**TAMPA ELECTRIC COMPANY  
DOCKET NO. 20170271-EI  
OPC'S DEPOSITION  
WITNESS: CALDWELL  
LATE FILED DEPOSITION  
EXHIBIT NO. 61  
PAGE 1 OF 1  
FILED: AUGUST 22, 2018  
SUPPLEMENTED: FEBRUARY 11, 2019**

**Late File Exhibit No. 61:** provide Emera Affiliate Services Agreements that govern mutual assistance for service and payment (Title: "Emera Mutual Assistance Agreement with TECO").

- A.** Tampa Electric will provide the requested Bates stamped documents for immediate review by OPC, recognizing the proprietary nature of the confidential information provided. These documents are entitled to protection from public disclosure pursuant to Section 366.093, Florida Statutes, and will be provided subject to a Motion for a Temporary Protective Order.

Tampa Electric is providing the Emera Affiliate Services Agreements on the accompanying CD, recognizing the proprietary nature of the confidential information provided. These documents are entitled to protection from public disclosure pursuant to Section 366.093, Florida Statutes, and will be provided subject to a Motion for a Temporary Protective Order.

**TAMPA ELECTRIC COMPANY  
DOCKET NO. 20170271-EI  
OPC'S DEPOSITION  
WITNESS: CALDWELL  
LATE FILED DEPOSITION  
EXHIBIT NO. 74  
PAGE 1 OF 1  
FILED: AUGUST 22, 2018  
SUPPLEMENTED: FEBRUARY 11, 2019**

**Late File Exhibit No. 74:** Reconciliation to invoice.

- A.** Tampa Electric is working on the processing, review and organization of the cost data and associated information pertaining to restoration costs. On August 14, 2018, the company filed a motion of continuance to support the additional time needed to ensure the accuracy of the associated information pertaining to restoration costs. That motion was granted on August 15, 2018 by Order No. PSC-2018-0406-PCO-EI. Tampa Electric will file the Late File Exhibit when the review has been completed.

Tampa Electric has verified that all of the Canadian companies that provided outside services in the restoration support of the company's response to Hurricane Irma were paid in Canadian Dollars utilizing the appropriate exchange rate. Tampa Electric is providing the Excel spreadsheet with formulas intact on the accompanying CD and invoices for the four companies listed below that support this reconciliation, recognizing the proprietary nature of the confidential information provided. These documents are entitled to protection from public disclosure pursuant to Section 366.093, Florida Statutes, and will be provided subject to a Motion for a Temporary Protective Order.

- Chatman Kent Hydro DBA Entegrus Powerline Inc.
- Emera Utility Services
- Toronto Hydro Electric System Limited
- Nova Scotia Power

**TAMPA ELECTRIC COMPANY  
DOCKET NO. 20170271-EI  
OPC'S DEPOSITION  
WITNESS: CALDWELL  
LATE FILED DEPOSITION  
EXHIBIT NO. 75  
PAGE 1 OF 1  
FILED: AUGUST 22, 2018  
SUPPLEMENTED: FEBRUARY 11, 2019**

**Late File Exhibit No. 75:** supporting Invoice Detail for NS Power and Emera Utility Services.

- A.** Tampa Electric is working on the processing, review and organization of the cost data and associated information pertaining to restoration costs. On August 14, 2018, the company filed a motion of continuance to support the additional time needed to ensure the accuracy of the associated information pertaining to restoration costs. That motion was granted on August 15, 2018 by Order No. PSC-2018-0406-PCO-EI. Tampa Electric will file the Late File Exhibit when the review has been completed.

Tampa Electric has completed the reconciliation of Nova Scotia Power and Emera Utility Services that provided restoration assistance to Tampa Electric for Hurricane Irma. Tampa Electric is providing the Excel spreadsheets with formulas intact on the accompanying CD and invoices for these two companies that support this reconciliation as provided in Late File Exhibit No. 74 of this set. Recognizing the proprietary nature of the confidential information provided. These documents are entitled to protection from public disclosure pursuant to Section 366.093, Florida Statutes, and will be provided subject to a Motion for a Temporary Protective Order.

TAMPA ELECTRIC COMPANY  
DOCKET NO. 20170271-EI  
OPC'S DEPOSITION  
WITNESS: CALDWELL  
LATE FILED DEPOSITION  
EXHIBIT NO. 78  
PAGE 1 OF 1  
FILED: FEBRUARY 11, 2019

**Late File Exhibit No. 78:** identify which company the invoice on Exhibit 77 is for.

**A.** Exhibit No. 77 is from the from the invoice received from Emera Maine.

**Late File Exhibit No. 79:** did Empire work for FPL?

- A. Yes, Empire was released by Tampa Electric on September 17, 2017 at 5:04 PM to go perform restoration assistance to Florida Power and Light.

**TAMPA ELECTRIC COMPANY  
DOCKET NO. 20170271-EI  
OPC'S DEPOSITION  
WITNESS: CALDWELL  
LATE FILED DEPOSITION  
EXHIBIT NO. 89  
PAGE 1 OF 1  
FILED: AUGUST 22, 2018  
SUPPLEMENTED: FEBRUARY 11, 2019**

**Late File Exhibit No. 89:** complete Orange and Rockland Time Sheet/Labor Reconciliation.

- A.** Tampa Electric is working on the processing, review and organization of the cost data and associated information pertaining to restoration costs. On August 14, 2018, the company filed a motion of continuance to support the additional time needed to ensure the accuracy of the associated information pertaining to restoration costs. That motion was granted on August 15, 2018 by Order No. PSC-2018-0406-PCO-EI. Tampa Electric will file the Late File Exhibit when the review has been completed.

Tampa Electric has completed the reconciliation of Orange and Rockland final time sheets/labor that provided restoration assistance to Tampa Electric for Hurricane Irma. Tampa Electric is providing the Excel spreadsheet with formulas intact on the accompanying CD and time sheets that support this reconciliation, recognizing the proprietary nature of the confidential information provided. These documents are entitled to protection from public disclosure pursuant to Section 366.093, Florida Statutes, and will be provided subject to a Motion for a Temporary Protective Order. On the associated Excel spreadsheet, please see Tabs "C.2 – Time Sheets" for their time sheets and please see Tabs "C.1 – Rate Sheets" which provides what the time reporting codes mean.