

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power
Cost Recovery Clause with
Generating Performance Incentive
Factor

DOCKET NO. 20190001-EI

FILED: August 21, 2019

NOTICE OF CONFIDENTIAL DEPOSITION DUCES TECUM

TO: Duke Energy Florida, LLC
Dianne M. Triplett, Esq.
299 First Avenue North
St. Petersburg, FL 33701
dianne.triplett@duke-energy.com

Matthew R. Bernier, Esq.
106 East College Avenue, Suite 800
Tallahassee, FL 32301
matthew.bernier@duke-energy.com

NOTICE is hereby given that pursuant to Rule 28-106.206, Florida Administrative Code and Florida Rule of Civil Procedure 1.310, the Office of Public Counsel will take the deposition of the following named individuals at the location and time indicated below:

NAME	DATE and TIME	LOCATION
Duke Energy Florida, LLC (DEF) Corporate Representative, or Panel of Corporate Representatives, as described below.	Friday, August 30, 2019 1:30 P.M.	Duke Energy Florida, LLC 299 First Avenue North St. Petersburg, FL 33701

Please produce as a corporate representative the following person or persons:

1. The Long Term Solution Team (“Team”) referenced in the testimony of DEF witness Jeffery Swartz, found in Vol. III, at P. 408, Lines 1-2, of the transcript of the Hearing from November 5, 2018.

Each deponent is requested to bring the documents which are related to his or her role(s) in the analysis and resolution of the operational problems at the root of the Bartow Plant outage issues. Please also bring a copy of each preliminary, interim and final report (including any revised or updated final report) generated by the Team, including drafts circulated within and outside the Team for review and comment. Please also bring all workpapers, analysis, memoranda, supporting documentation (including documents relied upon, consulted and referenced in the development and preparation of the reports generated by the Team. The term “report” includes any document that the Team produced that contained a recommendation for action.

This deposition shall be taken upon oral examination before an official court reporter or other officer authorized by law to take depositions. The deposition is being taken for purposes of discovery, for use at trial, and for any other purposes allowed under the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

Please govern yourselves accordingly.

Respectfully Submitted,

J.R. KELLY
PUBLIC COUNSEL

/s/ Thomas A. (Tad) David
Thomas A. (Tad) David
Associate Public Counsel

Charles J. Rehwinkel
Deputy Public Counsel

Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
(850) 488-9330
Attorneys for the Citizens
of the State of Florida

CERTIFICATE OF SERVICE
Docket No. 20190001-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 21st day of August, 2019, to the following:

Florida Public Service Commission
Office of General Counsel
Suzanne Brownless
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
sbrownle@psc.state.fl.us

Ausley Law Firm
James Beasley
Jeffrey Wahlen
Malcom Means
P.O. Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
jwahlen@ausley.com
mmeans@ausley.com

Beggs Law Firm
Steven A. Griffin
P.O. Box 12950
Pensacola FL 32591
srg@beggslane.com

Duke Energy
Dianne M. Triplett
299 First Avenue North
St. Petersburg, FL 33701
dianne.triplett@duke-energy.com

Duke Energy
Matthew R. Bernier
106 East College Avenue, Suite 800
Tallahassee, FL 32301
matthew.bernier@duke-energy.com

Florida Industrial Power Users
Group
Jon C. Moyle, Jr.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com

Florida Power & Light Company
Maria Moncada
Joel T. Baker
700 Universe Boulevard
Juno Beach, FL 33408
joel.baker@fpl.com
maria.moncada@fpl.com

Florida Power & Light Company
Kenneth A. Hoffman
134 W. Jefferson Street
Tallahassee, FL 32301
ken.hoffman@fpl.com

Florida Public Utilities
Company
Mike Cassel
1750 S. 14th Street, Suite 200
Fernandina Beach, FL 32034
mcassel@fpuc.com

Gulf Power Company
Russell Badders
C. Shane Boyett
One Energy Place
Pensacola, FL 32520
russell.badders@nexteraenergy.com
charles.boyett@nexteraenergy.com

Gulf Power Company
Holly Henderson
Lisa Roddy
134 West Jefferson Street
Tallahassee FL 32301
holly.henderson@nexteraenergy.com
Lisa.Roddy@nexteraenergy.com

Gunster Law Firm
Beth Keating
215 South Monroe Street, Suite
601
Tallahassee, FL 32301
bkeating@gunster.com

PCS Phosphate
James W. Brew
Laura A. Wynn
Eighth Floor, West Tower
1025 Thomas Jefferson St., NW
Washington, DC 20007
jbrew@smxblaw.com
law@smxblaw.com

Tampa Electric Company
Regulatory Affairs
Paula K. Brown
P.O. Box 111
Tampa, FL 33601
regdept@tecoenergy.com

/s/Thomas A. (Tad) David
Thomas A. (Tad) David
Associate Public Counsel
Florida. Bar No. 0706868