

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company.

DOCKET NO.: 20250011-EI

FILED: September 5, 2025

**CITIZENS' NOTICE OF VIDEO CONFERENCING DEPOSITION DUCES TECUM
PURSUANT TO RULE 1.310(B)(6), FLA. R. CIV. P. OF FLORIDA ENERGY FOR
INNOVATION ASSOCIATION**

The Citizens of Florida, through the Office of Public Counsel ("Citizens" or "OPC"), pursuant to Rule 1.310(b)(6) of the Florida Rules of Civil Procedure, will take the video conference deposition duces tecum of Florida Energy for Innovation Association ("FEIA") on Thursday, September 11, 2025, at 1:00 p.m. – 3:00 p.m. EST.

Pursuant to Rule 1.310(b)(6) of the Florida Rules of Civil Procedure, FEIA shall designate one or more officers, directors, managing agents, or other persons, each of whom is or are the most knowledgeable of, and have direct knowledge of the specific subjects listed on Attachment A hereto. These subjects generally concern the tangible and intangible benefits that FEIA received, intends to receive, expects to receive, or will receive, as a result of that party signing the August 20, 2025 Settlement Agreement in Docket No. 20250011-EI and the purpose of the signatory's participation in the docket, their understanding of the terms of the settlement agreement, and the impact of those terms. The organization is responsible for ensuring the designated deponent can provide complete and accurate answers to the specific subjects listed within Attachment A within the scope of the designated topics as to matters known or reasonably available to FEIA. These relevant facts may be considered by the Public Service Commission to determine whether the settlement agreement, when taken as a whole, resolves all the issues, results in fair, just and reasonable rates, and is in the public interest. *Sierra Club v. Brown*, 243 So. 3d 903, 909 (Fla. 2018).

The protected disclosure of privileged communications is not being sought in discovery, deposition, or at hearing. Counsel should raise timely and appropriate objections to preserve for in camera disposition.

The Witness(es) designated by FEIA should bring any relevant nondisclosure agreements that the corporate representative(s) wishes to assert for protections against disclosure, and any documents that the corporate representative wishes to rely upon.

This deposition is being taken for the purposes of discovery, for use at hearing, or for any other purpose allowed under the Florida Rules of Civil Procedure, Florida's Administrative Procedure Act, the Florida Rules of Evidence, and the Rules of the Florida Public Service Commission. A video conference link will be provided to all parties prior to the deposition.

Please govern yourselves accordingly.

Respectfully submitted,

/s/Walt Trierweiler

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CERTIFICATE OF SERVICE
DOCKET NO. 20250011-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 5th day of September, 2025, to the following:

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DOCKET NO. 20250011-EI, FPL 2025 RATE CASE

CITIZENS' NOTICE OF VIDEO-CONFERENCING DEPOSITION DUCES TECUM

ATTACHMENT A – SUBJECTS AND MATTERS UPON WHICH CORPORATE REPRESENTATIVE WILL BE DEPOSED

Definition:

“You” or “Your” refers to Florida Energy for Innovation Association.

1. All benefits, including both tangible and intangible benefits that you received, intend to receive, expect to receive, or will receive, as a result of that party signing the August 20, 2025, Stipulation and Settlement Agreement in Docket No. 20250011-EI;
2. The general nature of your members as customers of FPL, including the rate classes under which your members are served and including approximate numbers of your members who are served under each such rate class;
3. The rates that your members expect to be charged if the August 20, 2025, Stipulation and Settlement Agreement is approved as compared to the rates that your members would be charged if FPL's originally requested rate increases were approved;
4. The purpose of your participation in Docket No. 20250011-EI;
5. Your corporate purposes;
6. Provisions of your Articles of Incorporation or your Bylaws that confer upon you the authority to enter into the August 20, 2025, Stipulation and Settlement Agreement, on behalf of your members;
7. Any documents that reflect the specific authorization by any specific members of your organization to enter into the August 20, 2025, Stipulation and Settlement Agreement;

8. Any documents that reflect any specific requests by any specific members of your organization that you become a signatory to the August 20, 2025, Stipulation and Settlement in Docket No. 20250011-EI;
9. The identity or identities of the persons who authorized you to become a signatory to the August 20, 2025, Stipulation and Settlement;
10. The basis upon which the person or persons who authorized you to become a signatory to the August 20, 2025, Stipulation and Settlement gave their authorization to do so;
11. The understanding of those who authorized you to become a signatory to the August 20, 2025, Stipulation and Settlement of the terms of that Settlement;
12. The understanding of those who authorized you to become a signatory to the August 20, 2025, Stipulation and Settlement of the impact of the terms of that Settlement on your members;
13. The understanding of those who authorized you to become a signatory to the August 20, 2025, Stipulation and Settlement of the impact of the terms of that Settlement on the residential customers served by FPL; and
14. The understanding of those who authorized you to become a signatory to the August 20, 2025, Stipulation and Settlement of the impact of the terms of that Settlement on non-demand-metered commercial or “General Service” customers served by FPL.