

**Ruth Nettles**

090079-ET

**From:** Schrand, Shelly [sschrand@carltonfields.com]  
**Sent:** Tuesday, August 25, 2009 3:46 PM  
**To:** Filings@psc.state.fl.us  
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**Subject:** RE: Filing Docket 090079  
**Attachments:** Docket 090079 PEF 2 am ntc of depo woolridge.pdf; Docket 090079 PEF am ntc of depo pous lawton.pdf

In re: Petition for increase rates by Progress Energy Florida, Inc.

Attached for filing is Progress Energy Florida, Inc.'s Second Amended Notice of Deposition Duces Tecum (as to Location and Court Reporter) for J. Randall Woolridge [4 pages] and Progress Energy Florida, Inc.'s Amended Notice of Depositions Duces Tecum for Jacob Pous and Daniel Lawton [3 pages].

This filing is made on behalf of Progress Energy Florida by:

Shelly Schrand on behalf of Dianne M. Triplett

**CARLTON FIELDS**  
ATTORNEYS AT LAW

**Shelly Schrand**

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DOCUMENT NUMBER-DATE

08852 AUG 25 8

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for increase in rates  
by Progress Energy Florida, Inc.

Docket No. 090079-EI  
Filed: August 25, 2009

**PROGRESS ENERGY FLORIDA INC.'S SECOND AMENDED  
NOTICE OF DEPOSITION DUCES TECUM  
(AS TO LOCATION AND COURT REPORTER)**

To: Charles Rehwinkel  
Associate Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400

NOTICE is hereby given that Progress Energy Florida, Inc. will take the deposition duces tecum of the following named individual at the following location and time indicated:

J. Randall Woolridge	Thursday, Sept. 3, 2009 9:00 a.m.	<b>Telephonic</b> Deponent & Court Reporter Location: Office of Public Counsel The Florida Legislature 111 West Madison St., Room 812 Tallahassee, FL 32399-1400
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Upon oral examination before an official court reporter or other officer authorized by law to take depositions.

The deponent is requested to have with him all documents listed on the attached Schedule A, as well as his direct testimony and exhibits.

The deposition is being taken for purposes of discovery, for use at trial, or for any other purposes allowed under the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

Please govern yourself accordingly.

Respectfully,



JAMES MICHAEL WALLS  
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**Court Reporter:**

Premier Reporting  
112 West 5<sup>th</sup> Avenue  
Tallahassee, FL  
Phone: (850) 894-0828  
Fax: (850) 894-1506

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via electronic and U.S. Mail to the following counsel of record as indicated below on this 25th day of August, 2009.

  
ATTORNEY

KATHERINE FLEMING  
Staff Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd  
Tallahassee, FL 32399

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BILL MCCOLLUM/CECILIA BRADLEY  
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## SCHEDULE A

1. Any and all documents provided to him by Office of Public Counsel ("OPC") that are related to the preparation of the testimony filed by Mr. Woolridge on behalf of OPC and that have not been produced to PEF by OPC in response to discovery requests in this docket.
2. Any and all workpapers underlying Mr. Woolridge's testimony, review of PEF's 2009 test year review requirements and PEF's MFRs that have not been produced to PEF by OPC in response to discovery requests in this docket.
3. All time records (with PEF-specific work broken out separately) reflecting work done to develop the PEF-specific testimony, including but not limited to expense statements, timesheets, invoices, fee credits, and expense reports.
4. All bills rendered to OPC for the services provided for the purpose of developing the PEF-specific testimony.
5. Any and all agreements between you and OPC regarding the PEF-specific testimony, including but not limited to engagement agreements, consulting agreements, and documents reflecting the scope of the work you were to perform.
6. Any and all reports, other than the pre-filed testimony, that you prepared or drafted with respect to this docket.