

Marguerite McLean

090079-EI

From: Stephanie Alexander [SDA@trippscott.com]
Sent: Wednesday, September 09, 2009 1:28 PM
To: Filings@psc.state.fl.us
Cc: larry.r.allen@navy.mil; cecilia.bradley@myfloridalegal.com; jbrew@bbrslaw.com; john.burnett@pgnmail.com; Khojasteh.Davoodi@navy.mil; Katherine Fleming; alex.glenn@pgnmail.com; vkaufman@kagmlaw.com; Caroline Klancke; John T. Lavia, III; paul.lewisjr@pgnmail.com; rick@rmelsonlaw.com; jmoyle@kagmlaw.com; Charles Rehwinkel; Erik Saylor; jtselecky@consultbai.com; Stright, Lisa; ataylor@bbrslaw.com; audrey.VanDyke@navy.mil; Schef Wright; Keino Young; Walls, J. Michael; Triplett, Dianne; Bernier, Matthew R.; Costello, Jeanne
Subject: Emailing: Docket 090079 Cross-Notice of Taking Deposition - Sussler
Attachments: DOC090909.pdf

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

a. The name, address, telephone number, and email address for the person responsible for this filing is:

Stephanie Alexander, Esq.
Tripp Scott, PA

Tallahassee Office
200 West College Avenue, Suite 216
Tallahassee, FL 32301
Tel: (850) 906-9100
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email: sda@trippscott.com
http: www.trippscott.com

b. This filing is made in docket 090079-EI.

c. The document is being filed on behalf of the Association for Fairness in Rate Making.

d. The total number of pages in the document are 5 pages.

e. The attached document is AFFIRM's Cross-Notice of Deposition of Witness Slusser.

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From: Costello, Jeanne [mailto:jcostello@carltonfields.com]
Sent: Tuesday, September 08, 2009 4:32 PM
To: Filings@psc.state.fl.us
Cc: Stephanie Alexander; larry.r.allen@navy.mil; cecilia.bradley@myfloridalegal.com; jbrew@bbrslaw.com; john.burnett@pgnmail.com; Khojasteh.Davoodi@navy.mil; keflemin@psc.state.fl.us; alex.glenn@pgnmail.com; vkaufman@kagmlaw.com; cklancke@psc.state.fl.us; John T. Lavia, III; paul.lewisjr@pgnmail.com; rick@rmelsonlaw.com; jmoyle@kagmlaw.com; rehwinkel.charles@leg.state.fl.us; esaylor@psc.state.fl.us; jtselecky@consultbai.com; Stright, Lisa; ataylor@bbrslaw.com; audrey.VanDyke@navy.mil; Schef Wright; kyoung@psc.state.fl.us; Walls, J. Michael; Triplett, Dianne; Bernier, Matthew R.
Subject: Emailing: Docket 090079 Notice of Taking Deposition - Keppler.pdf

DOCUMENT NUMBER DATE

09331 SEP-9 8

9/9/2009

FPSC-COMMISSION CLERK

Docket 090079

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

1. This filing is made by

Jeanne Costello on behalf of Progress Energy Florida, Inc.

Carlton Fields, P.A.

4221 W. Boy Scout Boulevard, Suite 1000

Tampa, Florida 33607-5780

direct 813.229.4917

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2. This filing is Progress Energy Florida, Inc.'s Notice of Taking Deposition - Russell Keppler.

3. This filing is 3 pages.

4. This filing is made on behalf of Progress Energy Florida, Inc.

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9/9/2009

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 090079-EI

DATED: August 31, 2009

CROSS-NOTICE OF DEPOSITION DUCE TECUM

To: John T. Burnett/ R. Alexander Glenn
Progress Energy Services Company, LLC
P.O. Box 14042
St. Petersburg, Florida 33733-4042

NOTICE is hereby given that the Association For Fairness In Rate Making (AFFIRM) will take the deposition of the following named individual indicated below:

NAME	DATE and TIME	LOCATION
William C. Slusser, Jr	Thursday, September 10, 2009, at 9:00 a.m.	Room 362, Gunter Building 2540 Shumard Oak Blvd. Tallahassee, FL 32399

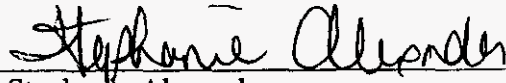
DOCUMENTS REQUESTED

The witness should bring copies of all the workpapers or other materials used by the witness and the preparation of any testimony filed in the captioned dockets and used by the witness in the preparation of any response concerning the captioned dockets. In addition, the witness should bring the documents identified in Appendix A, attached hereto.

This telephone deposition is being taken for the purpose of discovery for use at hearing or for any other purpose allowed under the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

DOCUMENT NUMBER-DATE
09331 SEP-98
FPSC-COMMISSION CLERK

Please govern yourself accordingly.

A handwritten signature in cursive script that reads "Stephanie Alexander". The signature is written in black ink and is positioned above a horizontal line.

Stephanie Alexander,

Tripp Scott, P.A.

Counsel for AFFIRM

200 West College Avenue, Suite 2 16

Tallahassee, Florida 32301

Telephone: (850) 906-9100

Facsimile: (850) 906-9104

sda@trippscott.com

APPENDIX A

Documents Requested

1. Please provide the hourly load shapes for the company's 12 monthly peak days in the years 2007, as those peak days were identified in the company's 2007 FERC Form 1, at page 401b.
2. Please provide the hourly load shapes for the company's 12 monthly peak days in the years 2008, as those peak days were identified in the company's 2008 FERC Form 1, at page 401b.
3. For each of the 8,760 hours in 2007, please provide the following information:
 - a. total amount of purchased power; and
 - b. the aggregate cost in dollars for each hour.
4. For each of the 8,784 hours in 2008, please provide the following information:
 - a. the total amount of purchased power; and
 - b. the aggregate cost in dollars for each hour.
5. Please produce Page 304 of FERC Form No. 1 of Progress Energy Florida (filed as Florida Power Corporation) for 12-31-2008.
 - a. Please confirm that the title of the page is "Sales of Electricity by Rate Schedules."
 - b. Please confirm that line 3, reflects data for 2008 for all Commercial and Industrial Service provided by PEF, i.e. that line 3 includes not only the billing information for rate schedules GSD-1 and GSDT-1, but for all other commercial and industrial rates as well.
 - c. Please produce a list of all commercial and industrial rate schedules subsumed in line 3.
 - d. Please produce a table reflecting for the each of the individual commercial and industrial rate schedules the applicable data for each of the columns, i.e, columns (b) MWh sold, (c) Revenue, (d) Average Number of Customers, (e) KWh of Sales per customer, and (f) Revenue Per KWh Sold.
 - e. Please produce a separate table comparing the data for GSD-1 and GSDT-1 from the table above with the data contained in Exhibit No. WCS-10 at page 1 of 2. If the data are different, include in the table an explanation as to why they are different.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

DOCKET NO. 090079-EI

DATED: August 31, 2009

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Cross-Notice of Telephonic Deposition was furnished to John T. Burnett/R. Alexander Glenn and that a true and correct copy was furnished by electronic and/or by U.S. Postal Mail, on this 9th day of September, 2009:

Progress Energy Florida Inc.
Paul Lewis, Jr.
106 East College Avenue, Suite 800
Tallahassee, Florida 32301-7740

J. Michael Walls/Dianne M. Tripplett
Carlton Fields Law Firm
Post Office Box 3239
Tampa, Florida 33601-3239

Florida Retail Federation
Robert Scheffel Wright/John T. LaVia III
Young van Assenderp, P.A.
225 South Adams Street, Suite 200
Tallahassee, Florida 32301

Florida Industrial Power Users Group
Vicki G. Kaufman/Jon C. Moyle, Jr.
Keefe Anchors Gordon & Moyle, PA
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Tallahassee, Florida 32301

Office of Attorney General
Bill McCollum/Cecilia Bradley
The Capitol, PL01
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Office of Public Counsel
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111 W. Madison Street, Room 812
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PCS Phosphate – White Springs
James W. Brew/F. Alvin Taylor
Brickfield Law Firm
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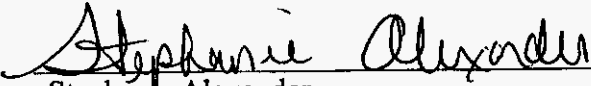
Kay Davoodi
Naval Facilities Engineering Command
Director, Utility Rates and Studies Office
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Washington Navy Yard, DC 20374-5065

Richard D. Melson
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Tallahassee, FL 32317

Audrey Van Dyke
Naval Facilities engineering command
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Stephanie Alexander
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