

Diamond Williams

100437-EI

From: Al Taylor [Al.Taylor@bbrslaw.com]
Sent: Friday, January 14, 2011 12:37 PM
To: Filings@psc.state.fl.us
Cc: 'J. Burnett'; 'Paul Lewis'; Jay Brew; 'Vicki Kaufaman'; 'John C. Moyle, Jr.'; Keino Young; Lisa Bennett; 'J. McWhirter'; 'J. R. Kelly'; Charles Rehwinkel
Subject: FPSC Docket No. 100437-EI PCS's Cross-Notice of Telephonic Deposition
Attachments: 2011 Cross Notice Terry et al.pdf

a. Person responsible for filing

James W. Brew
 Brickfield, Burchette, Ritts & Stone, P.C.
 1025 Thomas Jefferson Street, N.W.
 Eighth Floor West Tower
 Washington, D.C. 20007
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b. Docket No. 100437 -EI, Examination of the outage and replacement fuel/power costs associated with the CR3 steam generator replacement project, by Progress Energy Florida, Inc.

c. Filed on behalf of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate - White Springs

d. Total Pages = 3

e. PCS Phosphate's Cross-Notice of Telephonic Deposition

F. Alvin Taylor
 BRICKFIELD BURCHETTE RITTS & STONE, PC
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DOCUMENT NUMBER-DATE
 00360 JAN 14 =
 FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**Examination of the outage and replacement)
fuel/power costs associated with the CR3)
steam generator replacement project, by)
Progress Energy Florida, Inc.)**

**Docket No. 100437-EI
Filed: January 14, 2011**

CROSS-NOTICE OF TELEPHONIC DEPOSITION

TO: John T. Burnett
Progress Energy Service Company, LLC
Post Office Box 14042
St. Petersburg, FL 33733-4042

NOTICE is hereby given that the Attorneys of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs (“PCS Phosphate”) will take the telephonic deposition of the following individual indicated below:

NAME	DATE and TIME	LOCATION
Jim Terry	Thursday, January 20, 2011 at the conclusion of Public Counsel’s questions.	PEF EOF Training Center Conference Room #136 8200 West Venable Street Crystal River, FL 34429
Keith Henshaw	Thursday, January 20, 2011 at the conclusion of Public Counsel’s questions.	
Bill Flannagan	Friday, January 21, 2011 at the conclusion of Public Counsel’s questions.	

The witness should bring copies of all the work papers or other materials (including written and electronic correspondence) supporting the presentation labeled, “WS3 # 4.3.3 61 170 EC ED Methodology Study-Steam Generator Transport Through Containment,” and responses to Citizen’s First Request for Production of Documents (filed Nov. 15,2010), Request Nos. 4,5,6,9, and 11, and any documents identified by the undersigned prior to the deposition

Since the depositions of the individuals named above have already been noticed by the Office of Public Counsel (“OPC”), PCS Phosphate states that it will plan to ask its deposition questions, if any, at the conclusion of the depositions by OPC.

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These telephone depositions are being taken for purposes of discovery, for use at trial, or for any other purpose allowed under the Florida Rules of Civil Procedure, the Uniform Rules of Procedure, and the Rules of the Florida Public Service Commission.

Please govern yourselves accordingly.

Respectfully submitted,

s/ James W. Brew

James W. Brew

F. Alvin Taylor

Brickfield, Burchette, Ritts & Stone, P.C.

1025 Thomas Jefferson Street, N.W.

Eighth Floor, West Tower

Washington, D.C. 2007

Attorneys for

White Springs Agricultural Chemicals, Inc.

d/b/a PCS Phosphate – White Springs

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Examination of the outage and replacement)
fuel/power costs associated with the CR3)
steam generator replacement project, by)
Progress Energy Florida, Inc.)

Docket No. 100437-EI
Filed: January 14, 2011

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one correct copy of CROSS NOTICE OF TELEPHONIC DEPOSITIONS has been served by electronic and U. S. mail to John T. Burnett, Progress Energy Service Company, LLC, Post Office Box 14042, St. Petersburg, FL 33733-4042, and that a true copy thereof has been furnished to the following by electronic and/or U. S. mail this 14th day of January 14, 2011:

Keino Young
Florida Public Service Commission
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Charles Rehwinkle/J.R. Kelly
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 8 12
Tallahassee, FL 32399-1400

Cecilia Bradley
Office of Attorney General
The Capitol, PL01
Tallahassee, Florida 32399-1050

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

John T. Burnett
Progress Energy Service Company, LLC
Post Office Box 14042
St. Petersburg, FL 33733-4042

s/ F. Alvin Taylor
F. Alvin Taylor

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