

Dorothy Menasco

From: Al Taylor [Al.Taylor@bbrslaw.com]
Sent: Monday, November 21, 2011 9:02 AM
To: Filings@psc.state.fl.us
Cc: 'J. Burnett'; 'Paul Lewis'; Jay Brew; 'Vicki Kaufaman'; 'John C. Moyle, Jr.'; Keino Young; Lisa Bennett; 'J. R. Kelly'; 'rehwinkel.charles@leg.state.fl.us'; 'george@cavros-law.com'; 'bhuhta@carltonfields.com'; 'mbernier@carltonfields.com'; 'thomas@saprodani-associates.com'; 'Erik Saylor'; 'swright@gbwlegal.com'; Lee Eng Tan
Subject: FPSC Docket No. 100437-EI PCS Phosphate's Cross-Notice of Depositions
Attachments: 2011 Cross Notice Depositions - Franke Miller.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
 Tel: (202) 342-0800
 Fax: (202) 342-0807
jwb@bbrslaw.com

- 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 Depositions

F. Alvin Taylor
 BRICKFIELD BURCHETTE RITTS & STONE, PC
 1025 Thomas Jefferson St, N.W.
 Eighth Floor, West Tower
 Washington, DC 20007
 202-342-0800
 Fax: 202-342-0807
ataylor@bbrslaw.com

11/21/2011

DOCUMENT NUMBER-DATE
 08500 NOV 21 =
 FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**Examination of the outage and replacement)
fuel/power costs associated with the CR3) Docket No. 100437-EI
steam generator replacement project, by) Filed: November 21, 2011
Progress Energy Florida, Inc.)**

CROSS-NOTICE OF TELEPHONIC DEPOSITION

TO: John T. Burnett
Progress Energy Service Company, LLC
Post Office Box 14042
St. Petersburg, Florida 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 named individual indicated below:

NAME	DATE and TIME	LOCATION
Jon Franke	Monday, November 28, 2011 through Wednesday, November 30, 2011 8:30 am	Crystal River South Region Office 8202 West Venable Street Conference 3 & 4 Crystal River, FL 34429
Gary Miller	Thursday, December 1, 2011 through Saturday, December 3, 2011 8:30 am	Crystal River South Region Office 8202 West Venable Street Conference 3 & 4 Crystal River, FL 34429

Since the deposition of the individual named above has already been noticed by the Office of Public Counsel (“OPC”), Florida Industrial Power Users Group (FIPUG) and Florida Public Service Commission Staff (“Staff”), PCS Phosphate states that it will plan to ask its deposition questions, if any, at the conclusion of the depositions by OPC, FIPUG and Staff.

These depositions shall be taken upon oral examination before an official court reporter or other officer authorized by law to take depositions and 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.

DOCUMENT NUMBER-DATE
08500 NOV 21 =
FPSC-COMMISSION CLERK

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

CERTIFICATE OF SERVICE

I HEREBY certify that a true copy of the foregoing PCS' Phosphate's First Set of Interrogatories to Progress Energy Florida, Inc. has been furnished by electronic mail and/or U.S. Mail this 21st day of November 2011 to the following:

J.R. Kelly/Charles Rehwinkel
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32393-1400

Vicki G. Kaufman/Jon C. Moyle, Jr.
Florida Industrial Power Users Group c/o
Keefe Law Firm
118 North Gadsden Street
Tallahassee, FL 32301

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

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

Southern Alliance for Clean Energy
c/o George Cavros
120 East Oakland Park Blvd., Suite 105
Fort Lauderdale, FL 33334

Florida Retail Federation
Robert Scheffel Wright/John T. LaVia,
c/o Gardner Law Firm
1300 Thomaswood Drive
Tallahassee, FL 32308

Saprodani Associates
Thomas Saporito
P.O. Box 8413
Jupiter, FL 33468

Carlton Fields Law Firm
Matthew Bernier
215 S. Monroe Street, Ste 500
Tallahassee, FL 32301-1866

Carlton Fields Law Firm
J. Michael Walls/Blaise N. Huhta
P.O. Box 3239
Tampa, FL 33607-5736

/s/ F. Alvin Taylor
F. Alvin Taylor