

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power
Cost Recovery Clause with
Generating Performance Incentive
Factor

DOCKET NO. 20190001-EI

FILED: August 21, 2019

NOTICE OF CONFIDENTIAL DEPOSITION DUCES TECUM

TO: Duke Energy Florida, LLC
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NOTICE is hereby given that pursuant to Rule 28-106.206, Florida Administrative Code and Florida Rule of Civil Procedure 1.310, the Office of Public Counsel will take the deposition of the following named individuals at the location and time indicated below:

NAME	DATE and TIME	LOCATION
Duke Energy Florida, LLC (DEF) Corporate Representative, or Panel of Corporate Representatives, as described below.	Thursday, August 29, 2019 12:00 P.M. (Noon)	Duke Energy Florida, LLC Bartow Plant 1601 Weedon Island Drive St. Petersburg, Florida 33702

Please produce as a corporate representative the following person or persons:

1. The person or persons having the information responsive to OPC Interrogatory 46:

46. Please produce, in an electronic spreadsheet, the telemetry data from the plant control system for plant operation for the 50 highest steam turbine generator output hours when the steam turbine is producing a minimum of 450 MW. Data

should be in units of PSIA (pressure), degree F (temperature), MCF/hr (fuel flow) and lbm/hr (flow rate). If instrumentation data is not available for Bartow, provide data from the nearest upstream instrumentation and identify the location of the data source. If data is calculated as part of plant operations from plant heat balance data, provide that data also.

Please include, in the requested electronic spreadsheet, data for the following locations and identify the instrument locations:

- a. Pressure, temperature and flow for the inlets to and exits from the high pressure, intermediate pressure and low pressure steam turbines;
- b. Condenser pressure and temperature at outlet of low pressure steam turbine;
- c. Pressure, temperature and flow rate at outlet of the high pressure boiler feedwater pump;
- d. Steam turbine generator gross electric output;
- e. Pressure and temperature of both high pressure steam drums for each HRSG;
- f. Pressure and temperature of the intermediate pressure steam drums for each HRSG;
- g. Pressure and temperature of the low pressure steam drums for each HRSG;
- h. Fuel consumption for each combustion turbine;
- i. Generator output for each combustion turbine; and
- j. Fuel consumption for each HRSG duct burner.

The deponent described herein should have real-time access to Bartow plant information (PI). A panel of representatives may be produced.

The deponent is requested to bring the documents which are related to his or her role(s) in the analysis and resolution of the operational problems at the root of the Bartow Plant outage issues.

This deposition shall be taken upon oral examination before an official court reporter or other officer authorized by law to take depositions. The deposition is being taken for purposes of discovery, for use at trial, and for any other purposes allowed under the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

Please govern yourselves accordingly.

Respectfully Submitted,

J.R. KELLY
PUBLIC COUNSEL

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Attorneys for the Citizens
of the State of Florida

CERTIFICATE OF SERVICE
Docket No. 20190001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 21st day of August, 2019, to the following:

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