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DEF's Response to Staff's First Production of Documents Nos. 1-2

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC.

DOCKET NO. 20220050-EI

FILED: June 6, 2022

CITIZENS' RESPONSE TO DUKE ENERGY FLORIDA LLC'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 1-6)

The Citizens of the State of Florida, (OPC) by and through Richard Gentry, Public Counsel, by the requirements set forth in the Commission Order No. PSC-2022-0119-PCO-EI, Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, submit the following response to the First Request for Production of Documents (Nos. 1-6) propounded by Duke Energy Florida, LLC on May 17, 2022.

DOCUMENTS REQUESTED

1. Each Witness' resume and/or curriculum vitae.

Response: For the resume of Lane Kollen see the Direct Testimony of Lane Kollen filed May 31, 2022, exhibit LK-1. For the curriculum vitae of Kevin Mara, see the Direct Testimony of Kevin J. Mara, filed May 31, 2022, exhibit KJM-1. Please also see the supplemental CV of Kevin Mara bearing bates numbers 000001 through 000007.

2. Direct, rebuttal, or surrebuttal testimony and/or affidavits prepared by the Witness in the last five (5) years.

Response: For a list of testimony given by Lane Kollen, please see the Direct Testimony of Lane Kollen filed May 31, 2022, exhibit LK-1 pages 5 through 38 of 38. For a list of testimony given by Kevin Mara, please see the Direct Testimony of Kevin J. Mara, filed May 31, 2022, exhibit KJM-1 pages 3 through 7 of 7. Please also see the supplemental CV of Kevin Mara bearing bates numbers 000001 through 000007. Each filing is publicly available on the website of the relevant commission.