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OPC's Response to DEF's First
Production of Documents Nos. 1-4.

(Nos. 1-4 have attachments)

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.

3. Work papers, spreadsheets, electronic files, data, information, or other materials referred to and/or relied upon by the Witness in the course of preparing the Testimony filed in this docket other than materials that DEF provided to OPC in discovery.

Response: Both witnesses relied on the direct testimony and exhibits of DEF witnesses, Section 366.96, Florida Statutes and Rules 25-6.030, F.A.C. and 25-6.031 F.A.C. in preparing their testimony.

For Lane Kollen, please see the attached documents bearing bates numbers 000008 through 000013.

For Kevin Mara, see the Direct Testimony of Kevin J. Mara, filed May 31, 2022, exhibits KJM-3, KJM-5, and KJM-6. The National Electric Safety Code and NESC Handbook are copyrighted material but may be purchased at the following website: <https://standards.ieee.org/products-programs/nesc/> The IEEE 386-2016, IEEE Standard for Separable Insulated Connector Systems for Power Distribution Systems Rated 2.5kV through 35kV, Section 4.1 is copyrighted material but may be purchased at the following website: <https://webstore.ansi.org/Standards/IEEE/ieee3862016>

Please also see the attached documents bearing bates numbers 000014 through 000026.

4. Articles published or submitted for publication by the Witness in the last five (5) years on the same and/or similar issues and topics as those issues and topics addressed in the Testimony filed in this docket.

Response: There are no responsive documents related to the Direct Testimony of Lane Kollen. For Kevin Mara, please see the attached documents bearing bates numbers 000027 through 000034.

