

Eric Fryson

From: Marie Moyle <Marie@moylslaw.com>
Sent: Wednesday, June 19, 2013 2:34 PM
To: Filings@psc.state.fl.us
Cc: jbeasley@ausley.com; jwahlen@ausley.com; Martha Brown; Martha Barrera; Suzanne Brownless; kelly.jr@leg.state.fl.us; christensen.patty@leg.state.fl.us; kwiseman@andrewskurth.com; msundback@andrewskurth.com; lpurdy@andrewskurth.com; wrappolt@andrewskurth.com; burban@andrewskurth.com; schef@gbwlegal.com; jlavia@gbwlegal.com; Eric Fryson; Gregory.fike@us.af.mil
Subject: RE: 130040 FIPUG Notice of Deposition Duces Tecum- William Ashburn
Attachments: 130040 FIPUG Notice of Deposition - Ashburn.pdf

Attached please find a slightly revised Notice of Deposition Duces Tecum that includes the typed "signature line", something that was not included in the original file.

From: Filings@psc.state.fl.us [mailto:Filings@PSC.STATE.FL.US]
Sent: Tuesday, June 18, 2013 4:06 PM
To: Marie Moyle
Cc: jbeasley@ausley.com; jwahlen@ausley.com; Martha Brown; Martha Barrera; Suzanne Brownless; kelly.jr@leg.state.fl.us; christensen.patty@leg.state.fl.us; kwiseman@andrewskurth.com; msundback@andrewskurth.com; lpurdy@andrewskurth.com; wrappolt@andrewskurth.com; burban@andrewskurth.com; Gregory.fike@us.af.mil; schef@gbwlegal.com; jlavia@gbwlegal.com; Eric Fryson
Subject: FW: 130040 FIPUG Notice of Deposition Duces Tecum- William Ashburn

The Commission accepts documents for filing by electronic transmission ("electronic filing" or "e-filing") provided they meet the electronic filing requirements. Documents that fail to meet these requirements will not be accepted for electronic filing.

A link to the Commission's electronic filing requirements is being included for your convenience.

<http://www.floridapsc.com/dockets/e-filings/>

Your filing will need to be revised and resubmitted to be considered filed.

Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
850-413-6770

Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

From: Marie Moyle [mailto:Marie@moylslaw.com]
Sent: Monday, June 17, 2013 5:03 PM
To: Filings@psc.state.fl.us
Cc: jbeasley@ausley.com; jwahlen@ausley.com; Martha Brown; Martha Barrera; Suzanne Brownless;

kelly.jr@leg.state.fl.us; christensen.patty@leg.state.fl.us; kwiseman@andrewskurth.com;
msundback@andrewskurth.com; lpurdy@andrewskurth.com; wrappolt@andrewskurth.com; burban@andrewskurth.com;
Gregory.fike@us.a.mil; schef@gbwlegal.com; jlavia@gbwlegal.com

Subject: 130040 FIPUG Notice of Deposition Duces Tecum– William Ashburn

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

- a. The name, address, telephone number and email for the person responsible for the filing is:

Jon C. Moyle, Jr.
Moyle Law Firm, P.A.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301
(850) 681-3828
jmoyle@moylslaw.com

- b. This filing is made in Docket No. 130040
- c. The document is filed on behalf of Florida Industrial Power Users Group
- d. The total pages in the document are 3 pages.
- e. The attached document is 130040 FIPUG's Notice of Deposition Duces Tecum– William Ashburn

Serena Moyle
For Jon Moyle
Moyle Law Firm
850-681-3828

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Tampa Electric Company

DOCKET NO. 130040

SERVED: June 17, 2013

NOTICE OF DEPOSITION DUCES TECUM

TO: Jim Beasley, Esq.
Ausley Law Firm
Counsel for Tampa Electric Company
123 South Calhoun St.
Tallahassee, FL 32301

NOTICE is hereby given that the Florida Industrial Power Users Group ("FIPPUG") will take the deposition of the following named individuals at the following location and time as indicated:

NAME	DATE AND TIME	LOCATION
William R. Ashburn	Friday, June 28 th 2013 8:30 am	TECO Plaza 702 N. Franklin St. Tampa, FL 33602

The deponent is requested to have with him copies of all documents, including the work papers or other materials used by him in the preparation of any responses to discovery request(s) in this docket, any documents identified by the undersigned prior to the deposition, and any documents or materials the deponent relied upon in preparing his testimony filed with the Commission on or about April 5th, 2013.

DEFINITIONS

"Document" and "Documents" shall both mean any and all Electronic Data, and all other written and graphic matter or other means of preserving thought or expression, and all tangible things from which information can be processed or transcribed, including the originals and all non-identical copies, whether different from the original by reason of any notation made on such copy or otherwise, and specifically shall be deemed to include, without limitation, all agreements, e-mails, text messages, notes, reports, ledgers, books, records, in hard copy and Electronic Format.

“Electronic Format” shall mean Documents and all other information, stored and maintained on computers and in computer hardware and software of any kind, including, without limitation, all disc drives [CD and DVD], flash drives, thumb drives, floppy disks, text files (including word processing documents), spread sheets, email files and information concerning e-mail (including logs of e-mail history and usage, header information and “deleted” files), internet history files and preferences, graphical image files (including “.JPG, .PDF, .GIF, .BMP and .TIFF” files), all computer files, directories, and other databases, all system activity logs, and all file fragments and backup files and tapes, and all offsite and remote storage facilities [such as the “Cloud”, Crash Plan, Carbonite, Barracuda, Evault, Iron Mountain, any other similar third party remote storage devices and computers], containing data, backup tapes or discs of information (including but not limited to ZIP drives, jazz drives, thumb drives, USB drives, removable hard drives, floppy discs and any other electronic or magnetic storage device or me

This deposition is 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.

S/ Jon C. Moyle, Jr.

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Facsimile (850)681-8788
jmoyle@moylelaw.com

Attorneys for Florida Industrial
Power Users Group

DOCKET NO. 130040
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing **FIPUG'S NOTICE OF DEPOSITION** has been furnished by electronic mail to the following parties on this 17th day of June, 2013 to the following:

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S/ Jon C. Moyle, Jr
Jon Moyle