

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
FILE COPY

In re: Joint Petition for) DOCKET NO. 900709-EQ
Determination of Need for Proposed)
Electrical Power Plant and Related)
Facilities, Indiantown Project, by)
Florida Power and Light and)
Indiantown Cogeneration, L.P.)

In re: Petition for Approval of) DOCKET NO. 900731-EQ
Cogeneration Agreement Between)
Florida Power and Light Company)
and Indiantown Cogeneration, L.P.)

In re: Petition of Florida Power) DOCKET NO. 900796-EI
and Light Company for Inclusion) Filed: November 27, 1990
of the Scherer Unit No. 4)
Purchase in Rate Base, Including)
an Acquisition Adjustment)

NOTICE OF DEPOSITION DUCES TECUM

TO: Charles Guyton
Steel Hector and Davis
215 South Monroe Street
Suite 601
Tallahassee, Florida 32301

PLEASE TAKE NOTICE that pursuant to rule 1.310, Florida Rules of Civil Procedure, and rule 25-22.034, Florida Administrative Code, Nassau Power Corporation, by and through its undersigned counsel, will take the sworn deposition upon oral examination of S.S. WATERS, witness for Florida Power and Light for the purpose of discovery, for use at hearing, and for such other purposes as are permitted by the Florida Rules of Civil Procedure.

DOCUMENT NUMBER-DATE
10565 NOV 27 1990
PSC-RECORDS/REPORTING

The deposition will be taken at the following time and place, or at such other time and place as may be mutually agreed by counsel:

DATE AND TIME: Friday, November 30, 1990; 11 a.m.

LOCATION: Florida Power and Light Company
9250 West Flagler Street
Miami, Florida 33174

The deponent should bring with him to the deposition the following documents:

1. All documents, analyses, and workpapers underlying the calculation of the transmission energy loss (line loss) penalty factor referred to in FPL's response to Staff's First Set of Interrogatories, Interrogatory 21, in Docket Nos. 900709-EQ, 900731-EQ.

2. All documents, analyses, and workpapers underlying the calculation of the transmission capacity penalty referred to in FPL's response to Staff's First Set of Interrogatories, Interrogatory 21, including the workpapers supporting SSW-2 appended to the answer, in Docket Nos. 900709-EQ, 900731-EQ.

3. All documents, analyses, and workpapers supporting the "location related discounts" referenced in Mr. Waters' testimony in Docket No. 891049-EI.

4. All documents, analyses, and workpapers supporting the fuel forecast referenced on page 12, line 7 of Mr. Waters' prefiled testimony in Docket Nos. 900709-EQ, 900731-EQ.

5. All documents, analyses, and workpapers supporting the

calculation of the 900 MW figure appearing on page 16, lines 20-22 of Mr. Waters' prefiled testimony in Docket Nos. 900709-EQ, 900731-EQ.

6. All documents, analyses and workpapers supporting the \$58 million figure appearing on page 22, line 6 of Mr. Waters' prefiled testimony, the \$68 million figure appearing on page 22, line 10, and the \$67 million figure appearing in FPL's response to Staff's First Set of Interrogatories, Interrogatory No. 6, in Docket Nos. 900709-EQ, 900731-EQ.

7. All documents, workpapers, and analyses supporting the \$90 million figure appearing on page 20, line 3 and page 25, line 23 of Mr. Waters' prefiled testimony in Docket Nos. 900709-EQ and 900731-EQ.

8. All documents, workpapers, and analyses supporting the \$73 million figure appearing on page 20, line 8 of Mr. Waters' testimony in Docket Nos. 900709-EQ and 900731-EQ.

9. The QF forecast referred to on page 7, line 9 of Mr. Waters' prefiled testimony in Docket No. 900796-EI.

10. All documents, analyses and workpapers supporting Mr. Waters' Document 3 in Docket No. 900796-EI.

11. All workpapers, documents and analyses supporting Mr. Waters' Document 7 in Docket No. 900796-EI.

12. All workpapers, documents and analyses supporting Mr. Waters' Document 9 in Docket No. 900796-EI.

13. All workpapers, documents and analyses, including all

assumptions, supporting Mr. Waters' Document 10 in Docket No. 900796-EI.

14. All analyses, studies and other documents relating to Mr. Waters' testimony on the impact of a North Florida QF on economy energy transactions with Southern Company. (Docket Nos. 900709-EQ and 900731-EQ).

15. All documents relating to Mr. Waters' statement (page 6, line 16 of rebuttal testimony) that Nassau's location would prevent FPL from obtaining emergency power when needed to maintain system reliability. (Docket Nos. 900709-EQ and 900731-EQ).

16. The loss-of-load probability (LOLP) studies referred to in Mr. Waters' rebuttal testimony, page 7, lines 1-2. (Docket Nos. 900709-EQ and 900731-EQ).

17. All documents relating to FPL's analysis of "location effects" with respect to the 1988 UPS agreement and the proposed Scherer 4 transactions, as described in Mr. Waters' rebuttal testimony, pp. 7-8. (Docket No. 900709-EQ and 900731-EQ).

18. Documents relating to the calculation or derivation of "capacity value factors" depicted on Document 1 of Mr. Waters' rebuttal testimony. (Docket No. 900709-EQ and 900731-EQ).

Vicki Gordon Kaufman

Joseph A. McGlothlin
Vicki Gordon Kaufman
Lawson, McWhirter, Grandoff
and Reeves
522 East Park Avenue, Suite 200
Tallahassee, Florida 32301

Attorneys for Nassau
Power Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Notice of Deposition Duces Tecum has been furnished by hand delivery* or by U.S. mail to the following parties of record this 27th day of November, 1990:

Mike Palecki*
Bob Elias*
Ed Tellechea*
Bob Christ*
Fla. Public Service Commission
Division of Legal Services
101 East Gaines Street
Tallahassee, Florida 32301

Matt Childs*
Charlie Guyton*
Steel Hector and Davis
215 South Monroe Street
Suite 601
Tallahassee, Florida 32301

Frederick M. Bryant
Moore, Williams, Bryant,
Peebles and Gautier, P.A.
306 East College Avenue
Post Office Box 1169
Tallahassee, Florida 32302

H. G. Wells
Coalition of Local Government
Post Office Box 4748
Clearwater, Florida 34618

Richard D. Melson*
Hopping, Boyd, Green and Sams
Post Office Box 6526
Tallahassee, Florida 32314

John Roger Howe*
Office of Public Counsel
The Auditor General Building
111 West Madison Street
Room 812
Tallahassee, Florida 32301

Suzanne Brownless
Oertel, Hoffman, Fernandez
and Cole
2700 Blairstone Road
Suite C
Tallahassee, Florida 32301

Frederick J. Murrell
Schroder and Murrell
The Barnett Center
Suite 375
1001 Third Avenue, West
Bradenton, Florida 34205



Vicki Gordon Kaufman