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Ruth Nettles

090079-ET

**From:** Costello, Jeanne [jcostello@carltonfields.com]  
**Sent:** Tuesday, August 18, 2009 3:38 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** larry.r.allen@navy.mil; cecilia.bradley@myfloridalegal.com; jbrew@bbrslaw.com; john.burnett@pgnmail.com; Khojasteh.Davoodi@navy.mil; Katherine Fleming; alex.glenn@pgnmail.com; vkaufman@kagmlaw.com; Caroline Klancke; John T. Lavia, III; paul.lewisjr@pgnmail.com; rick@rmelsonlaw.com; jmoyle@kagmlaw.com; Charles Rehwinkel; Erik Saylor; jtselecky@consultbai.com; Stright, Lisa; ataylor@bbrslaw.com; audrey.VanDyke@navy.mil; Schef Wright; Keino Young; Walls, J. Michael; Triplett, Dianne; Bernier, Matthew R.; Tibbetts, Arlene  
**Subject:** Filing Docket 090079  
**Attachments:** Docket 090079 Notice of Taking Deposition - Woolridge.pdf; Docket 090079 Notice of Taking Deposition - Dismukes.pdf



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<<Docket 090079 Notice of Taking Deposition - Woolridge.pdf>> Do  
 <<Docket 090079 Notice of Taking Deposition - Dismukes.pdf>> cket 090079 In re: Petition  
 for increase in rates by Progress Energy Florida, Inc.

1. This filing is made by  
  
 Jeanne Costello on behalf of Dianne Triplett Carlton Fields, P.A.  
 4221 W. Boy Scout Boulevard, Suite 1000  
 Tampa, Florida 33607-5780  
 Direct: 813.229.4917  
 Fax: 813.229.4133  
 jcostello@carltonfields.com
2. This filing consists of two documents:
  - a. Progress Energy Florida, Inc.'s Notice of Taking Deposition Duces Tecum of Kimberly H. Dismukes on August 24, 2009; and
  - b. Progress Energy Florida, Inc.'s Notice of Taking Deposition Duces Tecum of J. Randall Woolridge on August 27, 2009.
3. Each filing consists of four (4) pages.
4. This filing is made on behalf of Progress Energy Florida, Inc.

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Petition for increase in rates  
by Progress Energy Florida, Inc.

Docket No. 090079-EI  
Filed: August 18, 2009

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**PROGRESS ENERGY FLORIDA INC.'S  
NOTICE OF DEPOSITION DUCES TECUM**

To: Charles Rehwinkel  
Associate Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400

NOTICE is hereby given that Progress Energy Florida, Inc. will take the deposition duces tecum of the following named individual at the following location and time indicated:

J. Randall Woolridge	Thursday, August 27, 2009 8:00 a.m.	Telephonic Deponent Location To Be Determined
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Upon oral examination before an official court reporter or other officer authorized by law to take depositions.

The deponent is requested to have with him all documents listed on the attached Schedule A, as well as his direct testimony and exhibits.

The deposition is being taken for purposes of discovery, for use at trial, or for any other purposes allowed under the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

Please govern yourself accordingly.

Respectfully,

R. ALEXANDER GLENN  
[alex.glenn@pgnmail.com](mailto:alex.glenn@pgnmail.com)  
JOHN T. BURNETT  
[john.burnett@pgnmail.com](mailto:john.burnett@pgnmail.com)  
Progress Energy Service Company, LLC  
299 First Avenue North  
P.O. Box 14042 (33733)  
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(727) 820-5184  
(727) 820-5249(fax)

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Tallahassee, FL 32312  
(850) 894-1351

**Court Reporter:** To be determined after location is decided

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via electronic and U.S. Mail to the following counsel of record as indicated on the attached service on this 18th day of August, 2009.

  
ATTORNEY

Docket 090009-EI  
Service List

KATHERINE FLEMING  
Staff Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd  
Tallahassee, FL 32399

J.R. KELLY/CHARLES REHWINKLE  
Office of the Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street – Room 812  
Tallahassee, FL 32399-1400

BILL MCCOLLUM/CECILIA BRADLEY  
Office of the Attorney General  
The Capitol – PL01  
Tallahassee, FL 32399-1050

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118 North Gadsden Street  
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1025 Thomas Jefferson Street, NW, 8<sup>th</sup> Fl  
Washington, D.C. 20007

R. SCHEFFEL WRIGHT / JOHN T. LAVIA  
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KAY DAVOODI  
Director, Utility Rates and Studies Office  
Naval Facilities Engineering Command  
1322 Patterson Avenue SE  
Washington Navy Yard, DC 20374-5065

AUDREY VAN DYKE  
Litigation Headquarters  
Naval Facilities Engineering Command  
720 Kennon Street, S.E. Bldg 36, Room 136  
Washington Navy Yard, DC 20374-5065

STEPHANIE ALEXANDER  
Tripp Scott, P.A.  
200 West College Avenue, Suite 216  
Tallahassee, Florida 32301

## SCHEDULE A

1. Any and all documents provided to him by Office of Public Counsel (“OPC”) that are related to the preparation of the testimony filed by Mr. Woolridge on behalf of OPC and that have not been produced to PEF by OPC in response to discovery requests in this docket.
2. Any and all workpapers underlying Mr. Woolridge’s testimony, review of PEF’s 2009 test year review requirements and PEF’s MFRs that have not been produced to PEF by OPC in response to discovery requests in this docket.
3. All time records (with PEF-specific work broken out separately) reflecting work done to develop the PEF-specific testimony, including but not limited to expense statements, timesheets, invoices, fee credits, and expense reports.
4. All bills rendered to OPC for the services provided for the purpose of developing the PEF-specific testimony.
5. Any and all agreements between you and OPC regarding the PEF-specific testimony, including but not limited to engagement agreements, consulting agreements, and documents reflecting the scope of the work you were to perform.
6. Any and all reports, other than the pre-filed testimony, that you prepared or drafted with respect to this docket.

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for increase in rates  
by Progress Energy Florida, Inc.

Docket No. 090079-EI  
Filed: August 18, 2009

**PROGRESS ENERGY FLORIDA INC.'S  
NOTICE OF DEPOSITION DUCES TECUM**

To: Charles Rehwinkel  
Associate Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400

NOTICE is hereby given that Progress Energy Florida, Inc. will take the deposition duces tecum of the following named individual at the following location and time indicated:

Kimberly H. Dismukes	Monday, August 24, 2009 1:00 p.m.	<b>Telephonic</b> Deponent & Court Reporter Location: Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 Phone: (850) 488-9330
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Upon oral examination before an official court reporter or other officer authorized by law to take depositions.

The deponent is requested to have with her all documents listed on the attached Schedule A, as well as her direct testimony and exhibits.

The deposition is being taken for purposes of discovery, for use at trial, or for any other purposes allowed under the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

Please govern yourself accordingly.

Respectfully,

R. ALEXANDER GLENN  
[alex.glenn@pgnmail.com](mailto:alex.glenn@pgnmail.com)  
JOHN T. BURNETT  
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(727) 820-5249(fax)

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Progress Energy Service Company, LLC  
106 East College Avenue, Suite 800  
Tallahassee, Florida 32301  
(850) 222-8738 / (850) 222-9768 (fax)

Court Reporter:

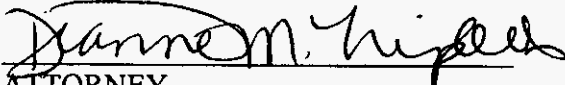
Premier Reporting  
112 West 5<sup>th</sup> Avenue  
Tallahassee, FL 32303  
Phone: (850) 894-0828  
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Florida Bar No. 0201243  
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Tallahassee, FL 32312  
(850) 894-1351

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via electronic and U.S. Mail to the following counsel of record as indicated on the attached service on this 18th day of August, 2009.

  
ATTORNEY

Docket 090009-EI  
Service List

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Staff Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd  
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Washington Navy Yard, DC 20374-5065

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Litigation Headquarters  
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720 Kennon Street, S.E. Bldg 36, Room 136  
Washington Navy Yard, DC 20374-5065

STEPHANIE ALEXANDER  
Tripp Scott, P.A.  
200 West College Avenue, Suite 216  
Tallahassee, Florida 32301



## SCHEDULE A

1. Any and all documents provided to her by Office of Public Counsel ("OPC") that are related to the preparation of the testimony filed by Ms. Dismukes on behalf of OPC and that have not been produced to PEF by OPC in response to discovery requests in this docket.
2. Any and all workpapers underlying Ms. Dismukes' testimony, review of PEF's 2009 test year review requirements and PEF's MFRs that have not been produced to PEF by OPC in response to discovery requests in this docket.
3. All time records (with PEF-specific work broken out separately) reflecting work done to develop the PEF-specific testimony, including but not limited to expense statements, timesheets, invoices, fee credits, and expense reports.
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5. Any and all agreements between you and OPC regarding the PEF-specific testimony, including but not limited to engagement agreements, consulting agreements, and documents reflecting the scope of the work you were to perform.
6. Any and all reports, other than the pre-filed testimony, that you prepared or drafted with respect to this docket.