

Dorothy Menasco

From: Huhta, Blaise N. [bhuhta@carltonfields.com]
Sent: Thursday, July 07, 2011 4:18 PM
To: Filings@psc.state.fl.us
Cc: Anna Norris; Keino Young; Charles Rehwinkel; sayler.erik@leg.state.fl.us; Vicki Gordon Kaufman; bryan.anderson@fpl.com; Jessica Cano; Paul Lewis Jr.; jbrew@bbrslaw.com; ataylor@bbrslaw.com; Matthew J. Feil; Randy B. Miller; Karen S. White; gadavis@enviroattorney.com; jwhitlock@enviroattorney.com; john.burnett@pgnmail.com; Walls, J. Michael; Glenn, Alex; Bernier, Matthew R.; jmoyle@kagmlaw.com; Huhta, Blaise N.; Costello, Jeanne; Schrand, Shelly
Subject: FILING: DOCKET NO. 110009-EI
Attachments: Docket No. 110009-EI PEF's Notice of Taking Deposition Duces Tecum.pdf

Electronic Filing:

a. The person responsible for this electronic filing is:

Blaise N. Huhta
Carlton Fields, P.A.
4221 W. Boy Scout Boulevard, Suite 1000
Tampa, Florida 33607-5780
Phone: 813.229.4328
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b. Docket No. 110009-EI, Nuclear Cost Recovery Clause

c. This filing is being made on behalf of Progress Energy Florida, Inc.

d. There are a total of five (5) pages in the attached document

e. The document is Progress Energy Florida, Inc.'s Notice of Taking Deposition Duces Tecum

Thank you.

DOCUMENT NUMBER-DATE

04655 JUL-7 =

FPSC-COMMISSION CLERK

7/7/2011

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Nuclear Power Plant
Cost Recovery Clause

Docket No. 110009-EI
Submitted for Filing: July 7, 2011

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

To: Charles Rehwinkel
Associate Counsel
Erik Sayler
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:

William R. Jacobs, Jr., Ph.D.	Friday, July 15, 2011 @ 9:00 a.m.	GDS Associates, Inc. 1850 Parkway Place, Ste. 800 Marietta, GA 30067 Phone No.: (770) 425-8100 A conference call in number will be provided for parties to participate telephonically as necessary.
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The deposition will be taken 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 prefiled testimony and exhibits in this docket. 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 submitted this 7th day of July, 2011.

R. Alexander Glenn
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Dianne M. Triplett
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PROGRESS ENERGY SERVICE
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s/ Blaise N. Huhta
James Michael Walls
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished to counsel and parties of record as indicated below via electronic and U.S. Mail this 7th day of July, 2011.

s/ Blaise N. Huhta
Attorney

Anna Norris
Keino Young
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cc: Court Reporter:
Via Facsimile and U.S. Mail

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Fax: (800) 442-2082
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SCHEDULE A

The deponent should bring with him the following documents:

1. All documents reviewed to draft testimony in this docket. The deponent may instead bring a list of all such documents reviewed, provided that all the documents were produced by PEF in the course of discovery in this proceeding.
2. 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.
3. All bills rendered to OPC for the services provided by GDS Associates for the purpose of developing the PEF-specific testimony in this docket.
4. Any and all agreements between GDS Associates and OPC regarding the PEF-specific testimony in this docket, including but not limited to engagement agreements, consulting agreements, and documents reflecting the scope of the work GDS Associates was to perform.
5. Any and all reports, other than the pre-filed testimony, that GDS Associates prepared or drafted with respect to the Levy Nuclear Project and/or the CR3 Uprate project.