

Diamond Williams

From: Al Taylor [Al.Taylor@bbrslaw.com]
Sent: Wednesday, July 27, 2011 12:04 PM
To: Al Taylor; Filings@psc.state.fl.us
Cc: Jay Brew; Charles Rehwinkel; 'paul.lewisjr@pgnmail.com'; 'john.burnett@pgnmail.com'; 'J. R. Kelly'; 'Anderson@fpl.com'; 'Kaufman, Vicki'; 'jessica.cano@fpl.com'; 'bhuhtha@carltonfields.com'; 'Jon C. Moyle'; 'mbernier@carltonfields.com'; 'mwalls@carltonfields.com'; 'RMiller@pcsphosphate.com'; 'mfeil@gunster.com'; 'allan.jungels@tyndall.af.mil'; 'karen.white@tyndall.af.mil'; Keino Young; 'Saylor.Erik@leg.state.fl.us'; 'Joseph McGlothlin'; 'Jamie Whitlock'; Anna Norris
Subject: FPSC Docket 110009-EI - PCS Phosphate's Cross-Notice of Deposition
Attachments: 2011 Cross Notice Elnitsky.pdf

- a. Person responsible for filing

James W. Brew
 Brickfield, Burchette, Ritts & Stone, P.C.
 1025 Thomas Jefferson Street, N.W.
 Eighth Floor West Tower
 Washington, D.C. 20007
 Tel: (202) 342-0800
 Fax: (202) 342-0807
jwb@bbrslaw.com

- b. Docket No. 110009-EI, In Re: Nuclear Cost Recovery Clause
- c. Filed on behalf of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs
- d. Total Pages = 3
- e. PCS Phosphate's Cross-Notice of Deposition - Elnitsky

F. Alvin Taylor
 BRICKFIELD BURCHETTE RITTS & STONE, PC
 1025 Thomas Jefferson St, N.W.
 Eighth Floor, West Tower
 Washington, DC 20007
 202-342-0800
 Fax: 202-342-0807
ataylor@bbrslaw.com

DOCUMENT NUMBER-DATE

05207 JUL 27 =

FPSC-COMMISSION CLERK

7/27/2011

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Nuclear Cost Recovery Clause

DOCKET NO. 110009-EI

FILED: July 27, 2011

CROSS-NOTICE OF TELEPHONIC DEPOSITION

TO: John T. Burnett
Progress Energy Service Company, LLC
Post Office Box 14042
St. Petersburg, Florida 33733-4042

NOTICE is hereby given that the Attorneys of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs (“PCS Phosphate”) will take the telephonic deposition of the following named individual indicated below:

NAME	DATE and TIME	LOCATION
John Elnitsky	Friday, July 29, 2011 9:00 am	Progress Energy Florida 299 1st Avenue North St. Petersburg, Florida 33701

The witness should bring copies of all work papers or other materials used by the witness in the preparation of any testimony filed in this docket or used by the witness in the preparation of any responses to Staff's or other party's discovery requests in this docket. **Since the deposition will be taken by telephone, please have a Notary Public available to swear in the witness.**

Since the deposition of the individual named above has already been noticed by the Office of Public Counsel (“OPC”), PCS Phosphate states that it will plan to ask its deposition questions, if any, at the conclusion of the depositions by OPC.

These telephone depositions are 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.

DOCUMENT NUMBER-DATE

05207 JUL 27 =

FPSC-COMMISSION CLERK

Please note that parties may participate in these depositions by calling the telephone number to be provided by separate email. Parties may also attend in person.

Please govern yourselves accordingly.

Respectfully submitted,

s/ James W. Brew

James W. Brew
F. Alvin Taylor
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, N.W.
Eighth Floor, West Tower
Washington, D.C. 2007

Attorneys for
White Springs Agricultural Chemicals, Inc.
d/b/a PCS Phosphate – White Springs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one correct copy of CROSS NOTICE OF TELEPHONIC DEPOSITIONS has been served by electronic and/or U. S. mail to John T. Burnett, Progress Energy Service Company, LLC, Post Office Box 14042, St. Petersburg, Florida 33733-4042, and that a true copy thereof has been furnished to the following by electronic and/or U. S. mail this 27th day of July 2011:

Keino Young
Anna Norris
Florida Public Service Commission
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Joseph McGlothlin
Erik L. Sayler
Office of Public Counsel
111 West Madison St.
Tallahassee, FL 32399

Matthew Bernier
Carlton Fields Law Firm
215 S. Monroe St., Ste. 500
Tallahassee, FL 32301

Mr. Paul Lewis, Jr.
Progress Energy Florida
106 East College Avenue, Suite 800
Tallahassee, FL 32301-7740

John T. Burnett / R. Alexander Glenn
Progress Energy Service Company, LLC
Post Office Box 14042
St. Petersburg, FL 33733-4042

J. Michael Walls
Blaise N. Huhta
Carlton Fields Law Firm
P. O. Box 3239
Tampa, FL 33601-3239

Matthew Feil
Gunster Law Firm
215 South Monroe St., Ste. 601
Tallahassee, FL 32301

Vicki Gordon Kaufman/Jon C. Moyle, Jr.
Keefe Law Firm
118 North Gadsden Street
Tallahassee, FL 32301

Bryan S. Anderson
Jessica Cano
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420

White Springs Agricultural Chemicals, Inc.
Randy B. Miller
15843 Southeast 78th Street
Post Office Box 300
White Springs, FL 32096

Karen S. White
Federal Executive Agencies
c/o AFLSA/JACL-ULFSC
139 Barnes Drive, Suite 1
Tyndall AFB, FL 32403-5319

Gary A. Davis/James S. Whitlock
Southern Alliance for Clean Energy
Gary A. Davis & Associates
61 North Andrews Avenue
Hot Springs, NC 28743

s/ F. Alvin Taylor
F. Alvin Taylor