

**Diamond Williams**

---

**From:** Al Taylor [Al.Taylor@bbrslaw.com]  
**Sent:** Wednesday, October 12, 2011 3:28 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** 'J. Burnett'; 'Paul Lewis'; Jay Brew; 'Vicki Kaufaman'; 'John C. Moyle, Jr.'; Keino Young; Lisa Bennett; 'J. R. Kelly'; 'rehwinkel.charles@leg.state.fl.us'; 'george@cavros-law.com'; 'bhuhta@carltonfields.com'; 'mbernier@carltonfields.com'; 'thomas@sapro-dani-associates.com'; 'Erik Saylor'; 'swright@gbwlegal.com'; Lee Eng Tan  
**Subject:** FPSC Docket No. 100437-EI PCS Phosphate's Cross-Notice of Depositions  
**Attachments:** 2011 Cross Notice Depositions.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](mailto:jwb@bbrslaw.com)

- b. Docket No. 100437 -EI, Examination of the outage and replacement fuel/power costs associated with the CR3 steam generator replacement project, by Progress Energy Florida, Inc.
- c. Filed on behalf of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs
- d. Total Pages = 4
- e. PCS Phosphate's Cross-Notice of Telephonic Depositions

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](mailto:ataylor@bbrslaw.com)

10/12/2011

DOCUMENT NUMBER-DATE

07486 OCT 12 =

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**Examination of the outage and replacement  
fuel/power costs associated with the CR3  
steam generator replacement project, by  
Progress Energy Florida, Inc.** )  
)  
)  
)

**Docket No. 100437-EI  
Filed: October 12, 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 Holliday	Tuesday, October 18, 2011 9:00 am Wednesday, October 19, 2011 9:00 am	PEF EOF Training Center Conference Room #136 8200 West Venable Street Crystal River, FL 34429
Dan Jopling	Wednesday, October 19, 2011 (30 min. after the conclusion of John Holliday’s deposition or 9:00 am if Holliday’s deposition concludes on October 18)	PEF EOF Training Center Conference Room #136 8200 West Venable Street Crystal River, FL 34429
Dhiren Pandya	Friday, October 21, 2011 9:00 am	PEF EOF Training Center Conference Room #136 8200 West Venable Street Crystal River, FL 34429
Howard Hill	Friday, October 21, 2011 (30 min. after the conclusion of Dhiren Pandya’s deposition)	PEF EOF Training Center Conference Room #136 8200 West Venable Street Crystal River, FL 34429
Jon Burchett	Tuesday, October 25, 2011 9:00 am	CR 3 South Region Office Conference Room 1 & 2 8202 West Venable Street Crystal River, FL 34429

DOCUMENT NUMBER-DATE

07486 OCT 12 =

FPSC-COMMISSION CLERK

Scott Hinnant	Wednesday, October 26, 2011 9:00 am	PEF EOF Training Center Conference Room #136 8200 West Venable Street Crystal River, FL 34429
Domingo Carriera	Thursday, November 10, 2011 9:00 am	Sargent & Lundy, LLC 35 <sup>th</sup> Floor, Conference Room 35E67 55 East Monroe Street Chicago, IL 60603
Javad Maslemian	Thursday, November 10, 2011 1:00 pm Friday, November 11, 2011 9:00 am	Sargent & Lundy, LLC 35 <sup>th</sup> Floor, Conference Room 35E67 55 East Monroe Street Chicago, IL 60603
Chris Sward	Friday, November 11, 2011 (30 min. after the conclusion of Javad Moslemian's deposition)	Sargent & Lundy, LLC 35 <sup>th</sup> Floor, Conference Room 35E67 55 East Monroe Street Chicago, IL 60603

Since the deposition of the individual named above has already been noticed by the Office of Public Counsel ("OPC") and Florida Industrial Power Users Group (FIPUG), PCS Phosphate states that it will plan to ask its deposition questions, if any, at the conclusion of the depositions by OPC and FIPUG.

These depositions shall be taken upon oral examination before an official court reporter or other officer authorized by law to take depositions and 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.

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. 20007

Attorneys for

White Springs Agricultural Chemicals, Inc.

d/b/a PCS Phosphate – White Springs

**CERTIFICATE OF SERVICE**

I HEREBY certify that a true copy of the foregoing PCS' Phosphate's First Set of Interrogatories to Progress Energy Florida, Inc. has been furnished by electronic mail and/or U.S. Mail this 12th day of October 2011 to the following:

J.R. Kelly/Charles Rehwinkel  
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee, FL 32393-1400

Vicki G. Kaufman/Jon C. Moyle, Jr.  
Florida Industrial Power Users Group c/o  
Keefe Law Firm  
118 North Gadsden Street  
Tallahassee, FL 32301

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

John T. Burnett  
Progress Energy Service Company, LLC  
P.O. Box 14042  
St. Petersburg, FL 33733-4042

Southern Alliance for Clean Energy  
c/o George Cavros  
120 East Oakland Park Blvd., Suite 105  
Fort Lauderdale, FL 33334

Florida Retail Federation  
Robert Scheffel Wright/John T. LaVia,  
c/o Gardner Law Firm  
1300 Thomaswood Drive  
Tallahassee, FL 32308

Saprodani Associates  
Thomas Saporito  
P.O. Box 8413  
Jupiter, FL 33468

Carlton Fields Law Firm  
Matthew Bernier  
215 S. Monroe Street, Ste 500  
Tallahassee, FL 32301-1866

Carlton Fields Law Firm  
J. Michael Walls/Blaise N. Huhta  
P.O. Box 3239  
Tampa, FL 33607-5736

/s/ F. Alvin Taylor  
F. Alvin Taylor