

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Florida Power & Light Company's
Petition for Approval of Arrangement to
Mitigate Impact of Unfavorable Cedar Bay
Power Purchase Obligation

DOCKET NO.: 150075-EI

FILED: June 25, 2015

**THE FLORIDA INDUSTRIAL POWER USERS GROUP'S
CROSS NOTICE OF TAKING DEPOSITION DUCES TECUM**

TO: ALL PARTIES

Pursuant to Rule 1.310, Florida Rules of Civil Procedure, notice is hereby given that the Florida Industrial Power Users Group (FIPUG) will take the deposition of the following named individual(s) at Florida Power & Light Company, 700 Universe Boulevard, Juno Beach, FL 33408-0420.

NAME	DATE AND TIME
THOMAS L. HARTMAN ¹	Wednesday, July 1, 2015 at 8:30 a.m.
ROBERT E. BARRETT ²	Wednesday, July 1, 2015 30 minutes following the conclusion of the deposition of Thomas L. Hartman

¹ Please bring all documents relied upon or used to support your testimony; also, please bring all documents related to negotiations of the Cedar Bay transaction for which you are seeking commission approval.

² Please bring all documents relied upon or used to support your testimony; also, please bring all documents related to negotiations of the Cedar Bay transaction for which you are seeking commission approval.

DAVID W. HERR ³	Thursday, July 2, 2015, at 8:30 a.m.
KIM OUSDAHL ⁴	Thursday, July 2, 2015, 30 minutes following the conclusion of the deposition of David W. Herr

The deponent is instructed to bring with him/her to the deposition any and all documents, photographs, workpapers, memorandums, correspondence, related to this matter which the witness possesses, or has received, referenced, relied upon or which was supplied to the witness by any person or party in connection with this matter or which was supplied by the witness to any person or party in connection with this matter. Included within this request are the documents identified in the respective footnotes for each witness.

The deposition will be taken upon oral examination before an official court reporter or other officer authorized by law to take depositions.

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.

³ Please bring all documents, including e-mails, regarding the following two appraisals you performed regarding the Cedar Bay Generating facility and its purchased power agreement:

- a. March 4, 2015 Report
- b. April 5, 2013 Report

Also, please bring any and all documents you relied upon in preparing your most recent appraisal report, identified in 2a above. Please bring any documents related to any transactions involving the Cedar Bay Generating facility between Goldman Sachs or its corporate affiliates and the Carlyle Group or its corporate affiliates.

⁴ Please bring all documents relied upon or used to support your testimony in this proceeding.

/s/ Jon C. Moyle

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Attorneys for Florida Industrial Power Users Group

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing Florida Industrial Power Users Group's Notice of Deposition has been furnished by electronic mail this 25th day of June, 2015, to the following:

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/s/ Jon C. Moyle
Jon C. Moyle