

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for determination of need for
Okeechobee Clean Energy Center Unit 1, by
Florida Power & Light Company.

DOCKET NO. 150196-EI

FILED: October 1, 2015

NOTICE OF TELEPHONIC DEPOSITION DUCES TECUM

NOTICE is hereby given that the Southern Alliance for Clean Energy (“SACE”) will take the telephonic deposition of the following named individual at the following location and time indicated:

NAME	DATE and TIME	LOCATION
Steve Sim	Thursday, October 8, 2015 10:00 a.m. (ET)	700 Universe Boulevard Juno Beach, FL 33408

Upon oral examination before an official court reporter or other officer authorized by law to take depositions. The oral examination will continue from day to day until completed.

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

This telephone deposition is 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 note that parties may participate in this deposition by calling the telephone number to be provided by separate email.

Please govern yourselves accordingly.

/s/ James S. Whitlock

James S. Whitlock

Gary A. Davis

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Counsel for Petitioner

Southern Alliance for Clean Energy

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail this 1st day of October, 2015, to the following:

<p>Kelly Corbari Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 KCorbari@psc.state.fl.us</p>	<p>William P. Cox 700 Universe Boulevard Juno Beach, FL 33408 Will.Cox@fpl.com</p>
<p>Patricia Christensen, Charles Rehwinkel Office of Public Counsel c/o Florida Legislature 111 West Madison Street, #812 Tallahassee, FL 32399 Christensen.patty@leg.state.fl.us Rehwinkel.charles@leg.state.fl.us</p>	<p>Kenneth Hoffman Florida Power and Light 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1858 Ken.Hoffman@fpl.com</p>
<p>Jon C. Moyle, Jr. Moyle Law Firm, PA 118 N. Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com</p>	

/s/ James S. Whitlock
James S. Whitlock

SCHEDULE A

The terms “document” or “documents” as used herein is to be construed broadly and shall mean any medium upon which intelligence or information can be recorded or retrieved, and includes, without limitation, the original and each copy, regardless of the origin or location of any book, pamphlet, periodical, letter, e-mail, memorandum (including memoranda, notes or reports of a meeting or conversation), agreements, communications, correspondence, telegrams, cables, telefax, records, summaries of records or personal conversations or interviews, desk calendars, appointment books, diaries, journals, forecasts, statistical statements, tabulations, accountants’ work papers, graphs, charts, accounts, analytical records, affidavits, minutes, records or summaries of meetings or conferences, reports or summaries of interviews or telephone conversations, reports of summaries of investigations, opinions or reports of consultants, appraisals, records, reports, press releases, contracts, notes projections, drafts of any documents, working papers, sound recordings, data processing records, microfilm, photographs, maps, charts, or any other written, typed, recorded, transcribed, punched, taped, filmed, electronically transmitted or graphic matter, however produced or reproduced, which is in your possession, custody or control or which has been but is no longer in your possession, custody, or control.

The deponent should bring with him the following documents:

1. Any and all documents, including work papers and other materials, used by him and/or reviewed by him in the preparation of his prefiled testimony filed in this case.
2. Order No. PSC-99-2507-S-EU, issued December 22, 1999, Docket No. 981890-EU (In re: Generic investigation into the aggregate electric utility reserve margins planned for Peninsular Florida).
3. Any and all FPL “analyses” referenced on p. 60 of Exhibit SRS-1 that “show that system reliability risk increases ... as dependence on DSM resources account for more than half of FPL’s 20% total reserve margin criterion value.”
4. Any and all documents supporting the use by FPL of a generation only reserve margin (GRM), as referred to on p. 12 of your testimony, as a reliability criterion for determining the timing and/or magnitude of FPL’s next resource need and/or OCEC Unit 1.
5. Any and all documents supporting the use by FPL of a generation only reserve margin (GRM) of 10%, as referred to on p. 12 of your testimony, as a reliability criterion for determining the timing and/or magnitude of its next resource need and/or OCEC Unit 1.
6. Any and all documents supporting your contention on p. 13 of your testimony that FPL is not aware of any addition cost-effective DSM to meet this next projected resource need that is not accounted for in FPL’s DSM goals.
7. Any and all documents demonstrating that FPL considered solar photovoltaic (PV) as a potential self-build generation option to address its 2019 resource need, as referenced on pp. 8 and 22 of your testimony, including, but not limited to, at the OCEC site.