

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost Recovery Clause

Docket No: 150007-EI
Filed: October 14, 2015

**FLORIDA POWER & LIGHT COMPANY'S
NOTICE OF WITNESSES' SUBJECT MATTER EXPERTISE**

Florida Power & Light Company ("FPL") hereby files this Notice of Expert Subject Matter Designations in response the objection set forth in Section H of the Florida Industrial Power Users Group's ("FIPUG") prehearing statement filed October 9, 2015. FIPUG lodges an objection to the experts' qualifications "unless the witness in question affirmatively states the subject matter area(s) in which he or she claims expertise." FPL believes that its prehearing statement and the prefiled testimony of each FPL witness provides adequate notice of each witness's area of expertise. Nonetheless, as further clarification, FPL proffers this notice as an affirmative statement of the subject matter of its witnesses' expertise for the purpose of this proceeding. FPL's witnesses are prepared to confirm the statements of expertise in this notice when they take the stand.

1. Terry J. Keith is qualified as an expert through his knowledge, skill, education, training and experience. Mr. Keith will testify as an expert on the subject matters of Issue Nos. 1-8, 9A, 9B and 13: regulatory treatment for the historical and projected costs of environmental compliance activities; calculations associated with the Commission's environmental cost recovery factors; the appropriate effective date of environmental cost recovery factors for 2016; and the tariff approval process.

2. Randall R. LaBauve is qualified as an expert through his knowledge, skill, education, training and experience. Mr. LaBauve will testify as an expert on the subject matter

of Issues 9A and 9B: environmental compliance costs incurred in connection with FPL's approved and proposed environmental cost recovery clause projects.

Respectfully submitted,

R. Wade Litchfield, Esq.
Vice President and General Counsel
John T. Butler, Esq.
Assistant General Counsel - Regulatory
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420
Telephone: (561) 304-5639
Fax: (561) 691-7135

By: s/ John T. Butler
John T. Butler
Florida Bar No. 283479

CERTIFICATE OF SERVICE
Docket No. 150007-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished
by electronic service this 14th day of October 2015 to the following:

Charles Murphy, Senior Attorney
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
cmurphy@psc.state.fl.us

J.R. Kelly, Esquire
Patricia Christensen, Esquire
Charles J. Rehwinkel, Esquire
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison St., Room 812
Tallahassee, Florida 32399-1400
kelly.jr@leg.state.fl.us
christensen.patty@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

James D. Beasley, Esquire
J. Jeffrey Wahlen, Esquire
Ashley M. Daniels, Esquire
Ausley & McMullen
Attorneys for Tampa Electric
P.O. Box 391
Tallahassee, Florida 32302
jbeasley@ausley.com
jwahlen@ausley.com
adaniels@ausley.com

Dianne Triplett, Esquire
Duke Energy Florida
299 First Avenue North
St. Petersburg, Florida 33701
dianne.triplett@duke-energy.com

Matthew R. Bernier
106 East College Avenue
Suite 800
Tallahassee, Fl 32301
Matthew.bernier@duke-energy.com

Jeffrey A. Stone, Esquire
Russell A. Badders, Esquire
Beggs & Lane
Attorneys for Gulf Power
P.O. Box 12950
Pensacola, Florida 32591-2950
srg@beggslane.com
rab@beggslane.com

James W. Brew, Esq.
Owen J. Kopon, Esq.
Laura A. Wynn, Esq.
Attorneys for PCS Phosphate - White Springs
Agricultural Chemicals, Inc.
Stone Mattheis Xenopoulos & Brew, PC
1025 1025 Thomas Jefferson St., NW
Eighth Floor, West Tower
Washington, DC 20007
jbrew@smxblaw.com
ojk@smxblaw.com
laura.wynn@smxblaw.com

Gary V. Perko, Esquire
Hopping Green & Sams
Attorneys for Duke Energy Florida
P.O. Box 6526
Tallahassee, Florida 32314
gperko@hgslaw.com

Paula K. Brown
Regulatory Coordination
Tampa Electric Company
P.O. Box 111
Tampa, Florida 33601
regdept@tecoenergy.com

Robert L. McGee, Jr.
Gulf Power Company
One Energy Place
Pensacola, Florida 32520-0780
rlmcgee@southernco.com

Jon C. Moyle, Jr., Esquire
The Moyle Law Firm, P.A.
Attorneys for FIPUG
118 N. Gadsden Street
Tallahassee, Florida 32301
jmoyle@moylelaw.com

By: *s/ John T. Butler*
John T. Butler
Fla. Bar No. 283479