

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for determination of need for) DOCKET NO. 150196-EI
Okeechobee Clean Energy Center Unit 1)
By Florida Power & Light Company)
_____)

**ENVIRONMENTAL CONFEDERATION OF SOUTHWEST FLORIDA’S NOTICE OF
TAKING DEPOSITION 1.310(b)(6) DUCES TECUM OF
FLORIDA POWER & LIGHT COMPANY**

NOTICE is hereby given that the Environmental Confederation of Southwest Florida, pursuant to Rule 1.310(b)(6), Florida Rules of Civil Procedure, will take the deposition upon oral examination of Florida Power & Light Co. before an officer authorized by law to administer oaths at the place and time listed below:

DATE: November 16, 2015
PLACE: Florida Power & Light Co.
700 Universe Blvd.
Juno Beach, Florida 33408
TIME: 10:00 a.m.

Pursuant to Rule 1.310(b)(6) of the Florida Rules of Civil Procedure, Florida Power & Light Co. (“FPL”) shall designate one or more officers, directors, agents, or other persons most knowledgeable concerning the Cumulative Present Value Revenue Requirements (“CPVRR”) of FPL assuming the Okeechobee Clean Energy Center Unit 1 (“OCEC Unit 1”) is built as compared to if the Okeechobee Clean Energy Center Unit 1 is not built (and no substitute unit is built or replacement power purchased) for the years 2019-2040.

The witness designated by FPL should bring copies of all workpapers and other materials related to the CPVRR of FPL with and without OCEC Unit 1.

This 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 e-mail. Parties may also attend in person.

ECOSWF is filing this deposition notice now in order to preserve its rights to take this deposition. The time and date of the deposition is subject to change pending FPL's availability. Furthermore, ECOSWF is prepared to cancel this deposition if FPL provides the necessary information regarding CPVRR for OCEC Unit 1 either in response to Staff's Interrogatories 80 and 83, or in response to a late-filed ECOSWF interrogatory or production of documents request.

Respectfully submitted this 4th day of November, 2015.

/s/ Bradley Marshall
Bradley Marshall
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*Counsel for Intervenor
Environmental Confederation of
Southwest Florida*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy and correct copy of the foregoing was served on
this 4th day of November, 2015 via electronic mail on:

Kelly Corbari Leslie Ames Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399 kcohari@psc.state.fl.us lames@psc.state.fl.us	Kenneth Hoffman Florida Power & Light Co. 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1858 ken.hoffman@fpl.com
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/s/Bradley Marshall
Bradley Marshall, Attorney