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BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:

DOCKET NO. 150263-EI

PETITION FOR DETERMINATION OF NEED FOR DUVAL-RAVEN
230 KV TRANSMISSION LINE IN BAKER, COLUMBIA, DUVAL,
AND NASSAU COUNTIES, BY FLORIDA POWER & LIGHT
COMPANY.

PROCEEDINGS: HEARING

COMMISSIONERS
PARTICIPATING: CHAIRMAN JULIE I. BROWN
COMMISSIONER LISA POLAK EDGAR
COMMISSIONER ART GRAHAM
COMMISSIONER RONALD A. BRISÉ
COMMISSIONER JIMMY PATRONIS

DATE: Wednesday, February 24, 2016

TIME: Commenced at 9:30 a.m.
Concluded at 9:37 a.m.

PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida

REPORTED BY: DEBRA KRICK
Court Reporter
(850) 894-0828

PREMIER REPORTING
114 W. 5TH AVENUE
TALLAHASSEE, FLORIDA
(850) 894-0828

1 APPEARANCES:

2 WILLIAM P. COX, ESQUIRE, 700 Universe
3 Boulevard, Juno Beach, Florida 33408-0420, on behalf of
4 Florida Power & Light Company.

5 LEE ENG TAN and CHARLES MURPHY, ESQUIRES,
6 FPSC General Counsel's Office, 2540 Shumard Oak
7 Boulevard, Tallahassee, Florida 32399-0850, appearing on
8 behalf of the Florida Public Service Commission Staff.

9 MARY ANNE HELTON, DEPUTY GENERAL COUNSEL,
10 Florida Public Service Commission, 2540 Shumard Oak
11 Boulevard, Tallahassee, Florida 32399-0850.

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I N D E X

WITNESSES

FRANCISCO PRIETO	PAGE
Prefiled testimony inserted	6

EXHIBITS

NUMBER:	ID.	ADMTD.
1		18
2 - 9		19

1 P R O C E E D I N G S

2 CHAIRMAN BROWN: Good morning, everybody. I
3 hope you are doing well, survived the thunderstorm
4 that it appears to not even be here.

5 Today is February 24th, and the time is 9:30,
6 and this is a hearing for petition for
7 determination of need for Duval-Raven 230 kV
8 transmission line by Florida Power & Light.

9 Staff, can you please read the notice? This
10 meeting is called to order.

11 MS. TAN: By notice published January 7th,
12 2016, this time and place is set for a hearing
13 conference in Docket No. 15263-EI. The purpose of
14 the hearing conference is set out in the notice.

15 CHAIRMAN BROWN: Thank you.

16 We will take appearances, starting with
17 Florida Power & Light.

18 MR. COX: Good morning, Chairman Brown,
19 Commissioners. William Cox appearing on behalf of
20 Florida Power & Light Company, with a business
21 address of 700 Universe Boulevard, Juno Beach,
22 Florida, 33408.

23 CHAIRMAN BROWN: Thank you.

24 Staff.

25 MS. TAN: Lee Eng Tan and Charlie Murphy on

1 behalf of Commission staff.

2 MS. HELTON: And Mary Anne Helton. I am here
3 as your advisor.

4 CHAIRMAN BROWN: Thank you.

5 Staff, are there any preliminary matters?

6 MS. TAN: Chairman, we note that the witness
7 has been excused, and FPL has waived its opening
8 statement.

9 CHAIRMAN BROWN: Okay. Let's address the
10 prefiled testimony at this point.

11 MS. TAN: Chairman, we ask that the prefiled
12 testimony of Francisco Prieto be inserted into the
13 record as though read. Cross-examination has been
14 waived.

15 CHAIRMAN BROWN: Thank you.

16 We will insert Francisco Prieto's testimony
17 into the record as though read.

18 (Whereupon, prefiled testimony was inserted.)

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1 **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**
2 **FLORIDA POWER & LIGHT COMPANY**
3 **PETITION FOR DETERMINATION OF NEED FOR**
4 **DUVAL-RAVEN 230 KV TRANSMISSION LINE IN**
5 **BAKER, COLUMBIA, DUVAL, AND NASSAU COUNTIES**
6 **DIRECT TESTIMONY OF FRANCISCO PRIETO**
7 **DOCKET NO. 150263-EI**
8 **JANUARY 11, 2016**

9 **Q. Please state your name and business address**

10 A. My name is Francisco Prieto. My business address is 4200 W. Flagler Street,
11 Miami, Florida 33134.

12 **Q. By whom are you employed and what position do you hold?**

13 A. I am employed by Florida Power & Light Company (“FPL” or the
14 “Company”) as Senior Manager, System Planning.

15 **Q. Please describe your duties and responsibilities in that position.**

16 A. My responsibilities include the direct supervision of engineers in the
17 development and evaluation of transmission expansion plans utilizing load
18 flow analysis. I have held this position and performed these responsibilities
19 since April of 2012.

20 **Q. Please describe your educational background and professional**
21 **experience.**

22 A. I graduated from the Florida International University with a Bachelor of
23 Science degree in Electrical Engineering in May of 1990. From 2007 through

1 April 2012, I served as Senior Manager of System Operations. I was
 2 responsible for supervising FPL Transmission System Operation personnel to
 3 ensure the safe, reliable operation of the FPL Bulk Power System in
 4 compliance with the North American Reliability Corporation (“NERC”)
 5 Reliability Standards. My primary duties and responsibilities included the
 6 operation and coordination of the FPL Generation, Transmission, and
 7 Substation system in order to provide reliable service to FPL’s customers in
 8 an efficient manner. I also ensure on-going personnel training needs are met
 9 on all processes and procedures necessary to maintain situational awareness
 10 during normal and emergency conditions.

11 **Q. Are you sponsoring an exhibit in this case?**

12 A. Yes. I am sponsoring Exhibits FP-1 through FP-3, which are attached to my
 13 direct testimony.

14 Exhibit FP-1 Map of Transmission and Generation

15 Exhibit FP-2 Duval-Raven Expected Construction Schedule

16 Exhibit FP-3 List of Contingencies

17 **Q. What is the purpose of your testimony?**

18 A. The purpose of my testimony is to sponsor and support FPL’s request for a
 19 determination of need for the Duval-Raven Transmission Project (“DRP”).
 20 Specifically, my testimony presents the following information in support of
 21 the DRP:

22 • General overview of the FPL transmission system;

- 1 • A general description of the DRP including the design and operating
2 voltage of the proposed transmission line, the starting and ending
3 points of the line, the approximate cost of the DRP, and the projected
4 in service date;
- 5 • The specific conditions, contingencies, and factors which demonstrate
6 the need for the DRP, including a discussion of FPL's transmission
7 planning process and the reliability benefits of the DRP;
- 8 • The major alternatives to the DRP that were evaluated and rejected by
9 FPL in favor of the DRP; and
- 10 • The adverse consequences to FPL's electric system and customers if
11 the DRP is delayed or denied.

12 **Q. Please summarize your testimony.**

13 A. The DRP 230 kV transmission line is the best and most cost-effective
14 alternative available to meet an FPL transmission need in December 2018,
15 taking into account the demand for electricity, the need to meet NERC
16 Reliability Standards for electric system reliability and integrity, and the need
17 for abundant, low-cost electrical energy to assure the economic well-being of
18 the residents of this state. FPL has examined all reasonable alternatives for
19 this need and determined that the DRP will provide its customers with
20 sufficient reliability at the lowest cost while maintaining operational
21 flexibility for FPL's system. Without this addition to the FPL transmission
22 system in December 2018, the economic well-being of Floridians would be at
23 risk due to needed electric service to meet projected new load in the affected

1 region and heightened exposure to potential system reliability and integrity
2 issues.

3 **OVERVIEW OF FPL'S TRANSMISSION SYSTEM**

4 **Q. Please describe FPL's transmission system.**

5 A. FPL is part of the nation's Eastern Interconnection transmission network. It
6 has multiple points of interconnection with other utilities that enable power to
7 be exchanged among utilities. The FPL transmission system is comprised of
8 approximately 6,888 circuit miles of transmission lines. Integration of the
9 generation, transmission, and distribution system is achieved through FPL's
10 596 substations.

11 The FPL transmission system is designed to integrate all of FPL's
12 generation resources to serve FPL's retail customers and to meet FPL's firm
13 long-term transmission service obligations in a reliable and cost effective
14 manner. It is planned and designed consistent with Reliability Standards and
15 criteria established by the NERC, at the direction of the Federal Energy
16 Regulatory Commission ("FERC"), and adopted by the Florida Reliability
17 Coordinating Council ("FRCC").

18 **Q. Please provide a brief description of the existing load and electric
19 characteristics.**

20 A. FPL's existing load characteristics consist primarily of residential and
21 commercial load with limited industrial load. FPL's summer peak demand in
22 2015 was 22,959 MW and the winter peak demand in 2015 was 19,718 MW,
23 serving approximately 4.8 million customers. An overview of FPL's existing

1 electrical transmission network indicating the general location of generating
2 plants, substations, and transmission lines is shown in Exhibit FP-1.

3 **DESCRIPTION OF THE DRP**

4 **Q. Please describe the proposed DRP transmission line for which FPL is**
5 **seeking a determination of need in this docket.**

6 A. The proposed line will connect from FPL's existing Duval Substation in
7 Duval County to FPL's planned new Raven Substation in Columbia County
8 (by December 2018) and to several substations in the area via upgraded
9 existing 115 kV transmission lines in Columbia County to address the
10 anticipated transmission system limitations.

11 As shown in Exhibit FP-3, FPL's studies indicate transmission limitations on
12 the existing 115 kV transmission network west of Baldwin Substation and
13 west of Bradford Substation. The new Duval-Raven 230 kV transmission line
14 will efficiently and effectively integrate and serve existing FPL and Clay
15 Electric Cooperative, Inc. distribution substations and any future substations
16 needed to serve the growing load in this area. In addition, the DRP would
17 mitigate potential overloads and low voltage conditions under contingency
18 events.

19 **Q. What is FPL's timetable for licensing, design, and construction of DRP?**

20 A. For an indicative schedule of licensing, designs, and construction, please see
21 Exhibit FP-2.

22 **Q. What is FPL's estimated capital cost of the DRP?**

23 A. The estimated capital cost of the DRP is \$71 million in 2018 dollars.

FPL PLANNING PROCESS

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2 **Q. How does FPL determine the need for new transmission lines?**

3 A. FPL's transmission system planning is governed by a series of NERC
4 Reliability Standards mandated by FERC and enforced by the FRCC. The
5 DRP is intended to meet NERC Reliability Standard TPL-001-4
6 (Transmission System Planning Performance Requirement). The applicable
7 NERC Reliability Standard is included as Attachment 5 to the Petition. Under
8 TPL-001-4, FPL is required, on annual basis, to complete a planning
9 assessment of its portion of the Bulk Electric System ("BES") that addresses
10 near-term and long-term planning horizons for steady state, short circuit, and
11 stability conditions. TPL-001-4 specifies transmission system operating
12 scenarios that should be evaluated, and the levels of system performance that
13 should be attained. FPL's transmission planning process is designed to ensure
14 compliance with the NERC and FRCC Planning Standards and involves three
15 major steps: (1) the preparation of system models, (2) the assessment of the
16 transmission system, and (3) the development and evaluation of alternatives.

17 **Q. What studies did FPL perform to determine the need for the DRP?**

18 A. Transmission assessment studies conducted by FPL in 2014 and 2015 have
19 identified regional transmission system limitations in Baker, Bradford,
20 Columbia, and Union Counties. These studies indicate that by December
21 2018, the existing 115 kV transmission network between Baldwin, Bradford,
22 and Columbia Substations will not have sufficient capacity to provide reliable
23 service to existing and proposed substation loads.

NEED FOR THE PROJECT

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2 Q. Please explain the need for the DRP.

3 A. The need for transmission system upgrades is based on potential overload
4 conditions associated with single contingency events, which occur when a
5 single element such as a generator, transmission circuit, or transformer is
6 disconnected from the system. If FPL does not add new transmission
7 capability in the Project Service Area by December 2018, FPL forecasts
8 potential overloads ranging from 9 to 14 percent of the thermal line ratings
9 and low voltage conditions under 3 separate single contingency events.

10 Q. Please explain the benefits of the DRP.

11 A. The proposed DRP would assure the economic well-being of the residents of
12 the state by providing low-cost electric service to projected new load in the
13 region and improving the region's electric system reliability by minimizing
14 the region's exposure to single contingency events. The proposed DRP will
15 also reduce on-peak transmission losses by approximately 6.3 MW. While the
16 final cost of the DRP is subject to the final route and length of the line and
17 other conditions that could be imposed through the Transmission Line Siting
18 Act process, I believe the DRP is the most cost-effective alternative to meet
19 our customer's needs.

20 Q. Please describe the contingencies that require the addition of the DRP.

21 A. Based on the Florida Power And Light Company's 2015 Ten Year Power
22 Plant Site Plan load forecast, there are approximately 118 potential System
23 Operating Limits ("SOL") violations under multiple double contingencies (N-

1 1-1) in the Baldwin-Columbia-Bradford 115 kV area in December 2018 [see
2 Exhibit FP-3]. If the DRP is completed by December 2018, the number of
3 potential SOL violations will be eliminated.

4 **Q. What is the proposed in-service date for the DRP?**

5 A. The projected in-service date is December 2018.

6 **Q. Would construction of the DRP provide for further load growth as well as
7 resolve these contingencies?**

8 A. Yes. An analysis of transmission alternatives resulted in FPL's selection of the
9 the DRP as the most cost-effective and efficient means to: (a) increase the
10 capacity of the existing 230 kV transmission network between FPL's Duval,
11 Baldwin, and Bradford Substations and relieve the loading on the existing 115
12 kV system in a reliable manner consistent with NERC Reliability Standards;
13 (b) serve the projected customer load increase in the area West of the existing
14 Bradford and Baldwin Substations and east of the planned Raven Substation;
15 and (c) provide another electrical feed from the Duval Substation in Duval
16 County to the Lake City area in Columbia County.

17 **Q. Are there other reliability and strategic benefits associated with the DRP?**

18 A. The DRP will increase reliability by providing a new 230 kV injection from
19 the existing Duval Substation to the proposed Raven Substation and looping
20 the existing Columbia-Macedonia and Bradford-Columbia 115 kV
21 transmission lines into the proposed Raven Substation. Further, the DRP
22 serves a strategic purpose by supplying potential future industrial,
23 commercial, and residential load south and east of Lake City and west of the

1 existing 230 kV transmission network from the northern portion of Duval to
2 the southern portion of Bradford County while maximizing system reliability
3 and minimizing cost to customers.

4 **DISCUSSION OF ALTERNATIVES**

5 **Q. Did FPL consider alternatives to the DRP?**

6 A. Yes.

7 **Q. What factors were employed to evaluate the alternatives?**

8 A. The factors used to evaluate the performance of the alternatives included
9 reliability, cost, construction feasibility, operational flexibility, right of way
10 (“ROW”) diversity, and future transmission system expandability.

11 **Q. Please describe the transmission alternatives that were considered and
12 explain the reasons why they were rejected.**

13 A. FPL evaluated three alternatives to the proposed DRP. Alternative I consists
14 of ampacity upgrades of several line sections, some of these sections requiring
15 reconductoring, in the 115 kV network between Baldwin, Bradford, and
16 Columbia Substations. Installation of capacitor banks for voltage support
17 would also be required. This alternative was deemed not to be practicable
18 because its implementation does not provide a long term solution in the outer
19 years of the planning horizon because it only reinforces the 115 kV network
20 and, long term, does not alleviate the need for future transmission
21 reinforcement in the area.

22 Alternative II consists of building a new 230 kV transmission line
23 approximately 20 miles from the Columbia Substation on a new ROW to loop

1 in and out of the existing Duke Energy Florida, Inc. (“DEF”) Suwannee River
2 Plant-Ft. White North 230 kV transmission line into the existing Columbia
3 Substation. This alternative was not considered a practicable option because
4 of the need to potentially acquire approximately 20 miles of new ROW, a
5 portion of which is located in residential areas in unincorporated Columbia
6 County and Lake City, coupled with limited space at the FPL Columbia
7 Substation property, also located in a residential area. An expansion of this
8 substation would be required, and the existing substation property is not large
9 enough to accommodate this expansion. Therefore, additional property would
10 have to be purchased for the expansion.

11 Alternative III consists of building a new 230 kV transmission line
12 from the existing DEF Ft. White Substation to the existing Columbia
13 Substation. This alternative was not considered a practicable and timely
14 option because of the need to acquire new ROW, some portion of which is in
15 residential areas in unincorporated Columbia County and Lake City.

16 **Q. Please describe why generation alternatives were not considered viable.**

17 A. Generation alternatives were not considered viable given the absence of a
18 preferred generation site in the area of the DRP. Preferred sites represent those
19 locations where FPL has conducted significant reviews, and has either taken
20 action, or is currently committed to take action, to site new generation
21 capacity. FPL will continue to evaluate whether there are any sites in the area
22 of the DRP that have potential as a site for future generation. However, no
23 final plans have been made in this regard.

1 **Q. Please describe why distribution alternatives were not considered viable.**

2 A. Most of the distribution system in Columbia, Union, and Baker Counties is
3 dependent on the existing 115 kV transmission network between Baldwin,
4 Bradford, and Columbia Substations, and by December 2018, the distribution
5 system will not have sufficient capacity to provide reliable service to existing
6 and proposed substations, hence a new transmission line is required.

7 **ADVERSE CONSEQUENCES OF DELAY OR DENIAL OF THE DRP**

8 **Q. Would there be adverse consequences to FPL's customers in the DRP**
9 **Service Area if the DRP is not timely approved?**

10 A. Yes. If FPL does not add new transmission capability in the DRP Service
11 Area by December 2018, potential overloads are forecasted ranging from 9 to
12 14 percent of the thermal line ratings and low voltage conditions under three
13 separate single contingency events, thus causing a violation of the NERC
14 Reliability Standards.

15 **Q. What would be the impact if certification of the DRP was denied?**

16 A. As discussed above, the economic well-being of the residents of the state
17 would be at risk due to the lack of needed electric service to meet projected
18 new load in the region, and exposure to potential system reliability and
19 integrity issues would be heightened.

20 **Q. Should the Commission approve the need for the DRP?**

21 A. Yes. For all the reasons described above, the Commission should determine
22 that there is a need for the Duval-Raven 230 kV transmission line to preserve

1 electric system reliability and integrity in the area and to maintain low-cost
2 electrical energy for the economic well-being of the residents of Florida.

3 **Q. Does this conclude your testimony?**

4 A. Yes.

1 CHAIRMAN BROWN: Exhibits.

2 MS. TAN: Staff has a stipulated comprehensive
3 exhibit list, which includes the prefiled exhibits
4 attached to the witness' testimony in this case,
5 along with staff's composite exhibits, which
6 reflect the discovery responses. The list has been
7 provided to the party, the Commissioners and the
8 court reporter. This list is marked as the first
9 hearing exhibit, and the other exhibits should be
10 marked as set forth in the chart.

11 At this time, we request that the
12 comprehensive exhibit list marked as Exhibit No. 1
13 be entered into the record.

14 CHAIRMAN BROWN: Okay. We will inter Exhibit
15 1 into the record.

16 (Whereupon, Exhibit No. 1 was received into
17 evidence.)

18 MS. TAN: And staff would like to move
19 Exhibits 2 through 9, which include FPL's and
20 staff's exhibits, into the record as set forth in
21 the comprehensive exhibit list.

22 CHAIRMAN BROWN: Okay. Seeing no objections,
23 we will enter Exhibit 2 through 9 into the record
24 as though read -- pardon me, into the exhibit list.
25 Thank you.

1 (Whereupon Exhibit Nos. 2 - 9 were received
2 into evidence.)

3 MS. TAN: And at this time, we suggest that,
4 since the parties are proposing stipulated
5 positions on all issues, no post-hearing filings
6 would be necessary, and the Commission, if it
7 desires, could make a bench decision in this case.

8 The likelihood of a bench decision is
9 mentioned in Section 13 of the prehearing order.
10 We can move to staff's recommendation on the
11 proposed stipulations if you would like.

12 CHAIRMAN BROWN: Yes, please.

13 MS. TAN: Okay. As you are aware, there are
14 five issues before you. They are all stipulated.
15 And as you can see, staff recommends that the
16 proposed stipulations on page five through eight of
17 the prehearing order, issues one through five, be
18 approved by the Commission.

19 CHAIRMAN BROWN: Okay. Commissioners, do you
20 have any questions for staff or for the party?

21 Commissioner Edgar.

22 COMMISSIONER EDGAR: Thank you, Madam Chair.

23 I would like to ask the petitioner very
24 briefly to summarize the request and the stipulated
25 positions.

1 CHAIRMAN BROWN: Excellent.

2 MR. COX: Sure. Commissioner Edgar and
3 Commissioners, Florida Power & Light Company has
4 filed a petition requesting the Commission
5 determination of need for a proposed transmission
6 line, the Duval-Raven 230 kV transmission line,
7 which would originate from our existing Duval
8 substation in Duval County, and stretch
9 38-and-a-half miles to the west and terminate in a
10 new Raven substation in Columbia County. It will
11 cross parts of Duval, Nassau, Baker and Columbia
12 counties as it runs west from the Duval substation.

13 As our filing has indicated, we continue to
14 experience customer load growth in the north region
15 of our territory, in particular, in the project
16 service area, which is an area west of Baldwin and
17 Bradford substations, and east of the planned Raven
18 substation in Columbia County.

19 As a result, we have investigated and assessed
20 the need for new facilities to meet that growth
21 need, and to continue to provide electric
22 particular service in a reliable manner consistent
23 with applicable North American Electric Reliability
24 Coordinating Council criteria.

25 Our studies have shown that, we did in 2014

1 and 2015, that there will be transmission system
2 limitations by December of 20 -- 2018 in the
3 project area if additional transmission facilities
4 are not put in this area.

5 We looked at various alternatives, including
6 both generation and distribution alternatives, in
7 addition to transmission alternatives, and our
8 analysis led to select Duval-Raven as the most
9 cost-effective and efficient means to meet the need
10 by enhancing our existing transmission networks in
11 that area.

12 Thank you.

13 COMMISSIONER EDGAR: Thank you very much.

14 I -- just to kind of lay the foundation for
15 our next steps here this morning, I would note that
16 issues one through four are the specific statutory
17 criteria that we are directed to examine. And
18 issue five, of course, is the keep the docket open
19 or closed depending on our decisions on issue one
20 through four.

21 I do believe that the need for this proposed
22 transmission line with a starting point and end
23 point has been proven, that it is necessary for
24 reliability, and recognizing the protected load
25 growth.

1 I also recognize that this proposal has
2 approximately 96 percent of the line within current
3 right-of-way helping with the cost-effectiveness,
4 and that the other alternatives would be more
5 costly.

6 And with that, Madam Chair, after our
7 discussion, I will be ready to make a motion.

8 CHAIRMAN BROWN: Thank you, Commissioner
9 Edgar.

10 Any other comments or questions?

11 I think we are ripe for a motion at this time.

12 COMMISSIONER EDGAR: Thank you. Then I would
13 move that we approve the stipulated agreements on
14 issues one through four, and then approve to close
15 the docket for issue five.

16 CHAIRMAN BROWN: Is there a second?

17 COMMISSIONER GRAHAM: Second.

18 CHAIRMAN BROWN: Any discussion?

19 All those in favor, say aye.

20 (Chorus of ayes.)

21 CHAIRMAN BROWN: All right. The motion
22 passes. Thank you.

23 And thank you to staff, and to the parties and
24 the prehearing officer for your work on this, for
25 really streamlining it for us today.

1 Staff, are there any other matters to be
2 addressed?

3 MS. TAN: Madam Chairman, there are no further
4 matters at this time. Since the Commission has
5 made a bench decision, post-hearing filings are not
6 necessary. The final order will be issued no later
7 than March 15th, 2016.

8 CHAIRMAN BROWN: Thank you.

9 Commissioners, any final comments before we
10 adjourn?

11 MR. COX: Thank you.

12 CHAIRMAN BROWN: Thank you. Thank you. This
13 hearing is a journaled. Thank you very much.

14 (Whereupon, the proceedings were concluded at
15 9:37 a.m.)

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CERTIFICATE OF REPORTER

STATE OF FLORIDA)
COUNTY OF LEON)

I, DEBRA R. KRICK, Professional Court Reporter, certify that the foregoing proceedings were taken before me at the time and place therein designated; that my shorthand notes were thereafter translated under my supervision; and the foregoing pages are a true and correct record of the aforesaid proceedings.

I further certify that I am not a relative, employee, attorney or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 3rd day of March, 2016.



DEBRA R. KRICK
NOTARY PUBLIC
COMMISSION #EE212307
EXPIRES JULY 13, 2016