

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Environmental Cost )  
Recovery Clause. )  
\_\_\_\_\_ )

DOCKET NO. 20170007-EI  
FILED: July 11, 2017

**CORRECTED NOTICE OF DEPOSITION DUCES TECUM**

TO: John Butler  
Jessica Cano  
Florida Power & Light Company  
700 Universe Blvd.  
Juno Beach, FL 33418  
[john.butler@fpl.com](mailto:john.butler@fpl.com)  
[Jessica.cano@fpl.com](mailto:Jessica.cano@fpl.com)

NOTICE is hereby given that the undersigned or another attorney with the Office of Public Counsel will take the deposition of the following named individual indicated below:

NAME	DATE AND TIME	LOCATION
Peter F. Andersen	Thursday, July 20, 2017 10:00 am	Office of Public Counsel 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400

The deponent is requested to have with him copies of the following documents:

1. Tetra Tech Technical Memorandum dated December 21, 2016 titled "Determination of Allocation of Costs for CCS Recovery and Improvement."
2. Tetra Tech Draft Technical Memoranda dated January 29, 2015 titled "Evaluation of Alternative Measures for Cooling Canal System Salinity Reduction," including but not limited to, any and all reconfigured calibrated water and salt balance models and calculations for Figure 2 of the referenced Draft Technical Memorandum which explain why the modeled salinities and water levels from the referenced water balance model spreadsheet do not match Figure 1.
3. Tetra Tech Technical Memorandum dated May 9, 2014 titled "Evaluation of Required Floridan Water for Salinity Reduction in the Cooling Canal System," including but not limited to, the predicted CCS stage and salinity computations indicated in Figures 1 and 2 of the referenced Technical Memorandum.
4. Tetra Tech Technical Memorandum dated December 3, 2014 titled "Evaluation of Drawdown in the Upper Floridan Aquifer Due to Proposed Salinity Reduction-based Withdrawals, including but not limited to, the drawdown computations indicated in Figures 8 and 9.

5. Tetra Tech Technical Memorandum dated May 13, 2014 titled "Evaluation of Drawdown in the Upper Floridan Aquifer Due to Proposed Salinity Reduction-based Withdrawals," including but not limited to, the drawdown computations indicated in Figures 9, 10 and 11.
6. Comprehensive Pre-Uprate Monitoring Report for Units 3 & 4 Uprate Project, October 31, 2012 by Ecology and Environment Inc.
7. All SEAWAT files related to the simulation for "Alternative3D\_CCSasContain\_model\_Input"
8. All SEAWAT files related to the simulation for "Alternative3D\_CCSasOther\_model"
9. Source codes for utility executables under "Alternative3D\_CCSasContain\_PostProcessing"
10. Source codes for utility executables under "Alternative3D\_CCSasOther\_PostProcessing"
11. Water and salt balance model excel spreadsheet "1\_Water balance\_Model\_Nov2015.xlsx," and any and all other revised excel files used for the balance calculations for past and predictive conditions.
12. All MODFLOW files for the various predictive simulations conducted for extraction from the UFA for CCS freshening water

This deposition shall 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.

Please note that a call in number and passcode will be provided to all parties at the service email address contained in the Certificate of Service prior to this deposition.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

J. R. Kelly  
Public Counsel



Stephanie A. Morse  
Associate Public Counsel

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400  
(850) 488-9330  
Attorneys for the Citizens  
of the State of Florida

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and foregoing Citizens' Notice of Service has been furnished by electronic mail on this 11th day of July, 2017, to the following:

Bianca Lherisson  
Charles Murphy  
Office of General Counsel  
Florida Public Service  
Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[blheriss@psc.state.fl.us](mailto:blheriss@psc.state.fl.us)  
[cmurphy@psc.state.fl.us](mailto:cmurphy@psc.state.fl.us)

James Beasley  
Jeffrey Wahlen  
Ashley Daniels  
Ausley Law Firm  
P.O. Box 391  
Tallahassee, FL 32302  
[jbeasley@ausley.com](mailto:jbeasley@ausley.com)  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)  
[adaniels@ausley.com](mailto:adaniels@ausley.com)

Jeffrey A. Stone  
Russell Badders  
Steve Griffin  
Beggs & Lane Law Firm  
P.O. Box 12950  
Pensacola, FL 32591  
[jas@beggslane.com](mailto:jas@beggslane.com)  
[rab@beggslane.com](mailto:rab@beggslane.com)  
[srg@beggslane.com](mailto:srg@beggslane.com)

Dianne M. Triplett  
Duke Energy  
299 First Avenue North  
St. Petersburg, FL 33701  
[dianne.triplett@duke-energy.com](mailto:dianne.triplett@duke-energy.com)

Matthew R. Bernier  
Duke Energy  
106 East College Avenue, Suite 800  
Tallahassee, FL 32301-7740  
[matthew.bernier@duke-energy.com](mailto:matthew.bernier@duke-energy.com)

Jon C. Moyle, Jr.  
Moyle Law Firm  
118 North Gadsden Street  
Tallahassee, FL 32301  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)

Ken Hoffman  
Florida Power & Light Company  
215 South Monroe St., Suite 810  
Tallahassee, FL 32301-1858  
[ken.hoffman@fpl.com](mailto:ken.hoffman@fpl.com)

John T. Butler  
Jessico Cano  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408-0420  
[john.butler@fpl.com](mailto:john.butler@fpl.com)  
[jessica.cano@fpl.com](mailto:jessica.cano@fpl.com)

Robert L. McGee, Jr.  
Gulf Power Company  
One Energy Place  
Pensacola, FL 32520-0780  
[rlmcgee@southernco.com](mailto:rlmcgee@southernco.com)

Paula K. Brown  
Tampa Electric Company  
Regulatory Affairs  
P.O. Box 111  
Tampa, FL 33601-0111  
[regdept@tecoenergy.com](mailto:regdept@tecoenergy.com)

James W. Brew  
Laura A. Wynn  
c/o Stone Law Firm  
1025 Thomas Jefferson St., NW, Eight  
Washington, DC 20007-5201  
[jbrew@smxblaw.com](mailto:jbrew@smxblaw.com)  
[law@smxblaw.com](mailto:law@smxblaw.com)

George Cavros  
120 E. Oakland Park Blvd.,  
Ste. 105  
Fort Lauderdale, FL 33334  
[george@cavros-law.com](mailto:george@cavros-law.com)



Stephanie A. Morse  
Associate Public Counsel  
Florida Bar No. 0068713