

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost
Recovery Clause

DOCKET NO. 170007-EI
FILED: October 6, 2017

**THE FLORIDA INDUSTRIAL POWER USERS GROUP'S
CROSS NOTICE OF DEPOSITION DUCES TECUM**

TO: ALL PARTIES

Pursuant to Rule 1.310, Florida Rules of Civil Procedure, notice is hereby given that the Florida Industrial Power Users Group (FIPUG) will take the deposition of the following named individual(s):

NAME	DATE AND TIME
Michael Sole	Monday, October 9, 2017 at 1:00 p.m. or following questioning by other parties/staff

The deponent is instructed to bring with him/her to the deposition any and all documents, photographs, workpapers, memorandums, correspondence, related to this matter which the witness possesses, or has received, referenced, relied upon or which was supplied to the witness by any person or party in connection with this matter or which was supplied by the witness to any person or party in connection with this matter. Included within this request are the documents identified in the respective footnotes for each witness.

The deposition will 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.

/s/ Jon C. Moyle

Jon C. Moyle, Jr.
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301
Telephone: (850) 681-3828
Facsimile: (850) 681-8788
jmoyle@moylelaw.com

Attorneys for Florida Industrial Power Users Group

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the following by Electronic Mail, on this 6th day of October, 2017:

Charles Murphy
Stephanie Cuello
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399
cmurphy@psc.state.fl.us
scuello@psc.state.fl.us

Jessica A. Cano
John Butler
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
jessica.cano@fpl.com
john.butler@fpl.com

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

James Beasley
Jeffrey Wahlen
Ashley Daniels

Ausley Law Firm
P.O. Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
jwahlen@ausley.com
adaniels@ausley.com

Kenneth Hoffman
Florida Public Service Commission
215 South Monroe Street, Suite 810
Tallahassee, FL 32301-1858
Ken.Hoffman@fpl.com

Stephanie A. Morse
Charles Rehwinkel
Patty Christensen
Office of Public Counsel
The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399
Christensen.patty@leg.state.fl.us
Rehwinkel.charles@leg.state.fl.us
Morse.stephanie@leg.state.fl.us

James W. Brew
Laura A. Wynn
1025 Thomas Jefferson St, NW
8th Floor
Washington, DC 20007

jbrew@smxblaw.com
laura.wynn@smxblaw.com

George Cavros
Southern Alliance for Clean Energy
120 E. Oakland Park Blvd.
Suite 105
Fort Lauderdale, FL 33334
George@cavros-law.com

Dianne Triplett
Matthew R. Bernier
Duke Energy Florida, Inc.
299 1st Avenue North, FL 151
St. Petersburg, FL 33701
dianne.triplett@duke-energy.com
matthew.bernier@duke-energy.com

Paula K. Brown Manager,
Regulatory Coordination
Tampa Electric Company
Post Office Box 111
Tampa, FL 33601
regdept@tecoenergy.com

Rhonda J. Alexander
Regulatory, Forecasting & Pricing Manager
Gulf Power Company
One Energy Place
Pensacola, Florida
32520-0780
rjalexad@southernco.com

/s/ Jon C. Moyle

Jon C. Moyle