

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for determination of need for
Dania Beach Clean Energy Center Unit 7, by
Florida Power & Light Company.

Docket No: 20170225-EI

Date: December 7, 2017

**FLORIDA POWER & LIGHT COMPANY'S
NOTICE OF TAKING DEPOSITION DUCES TECUM**

TO: Julie Kaplan, Esq.
Diana Csank, Esq.
Sierra Club
50 F Street NW, 8th Floor
Washington, DC 20001
Julie.Kaplan@sierraclub.org
Diana.Csank@sierraclub.org

Pursuant to Rule 1.310, Florida Rules of Civil Procedure, notice is hereby given that Florida Power & Light Company will take the deposition duces tecum of the following named individual identified below:

NAME	DATE & TIME	LOCATION
EZRA HAUSMAN	WEDNESDAY DECEMBER 20, 2017 9:00 AM	O'BRIEN & LEVINE 68 COMMERCIAL WHARF BOSTON, MA 02110 888-825-3376

The deponent shall bring copies of all the work papers or other materials used by the deponent in the preparation of any testimony filed or planned to be filed in this docket or used or being used by the deponent in the preparation of any responses to any discovery requests in this docket, including all the materials sent to Florida Power & Light Company or other parties because of discovery requests. The deponent shall bring copies of his entire file, including all correspondence and communication with Sierra Club concerning this docket, all billing records,

invoices, and retainer agreements. The deponent should also bring copies of those documents set forth in Exhibit A hereto. A Notary Public will be available to swear in the witness.

The 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 purpose allowed under the Florida Rules of Civil Procedure, the Uniform Rules of Procedure, and the Rules of the Florida Public Service Commission. The oral examination will continue from day to day until completed.

The deponent must appear in person at the location of the deposition specified in this notice for this deposition. The telephonic conference line is available if a party wishes to participate telephonically. The telephone number for the conference line is 305-552-3001. The Code is 71403679.

In accordance with the American with Disabilities Act, persons needing a special accommodation to participate at this proceeding should contact the Office of Commission Clerk as soon as possible prior to the deposition 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850 or 850-413-6770 (Florida Relay Service, 1-800-955-8770 Voice or 1-800-955-8771 TDD). Assistive Listening Devices are available upon request from the Office of Commission Clerk, Gerald L. Gunter Building, Room 152.

Please govern yourselves accordingly.

By: s/William P. Cox
William P. Cox
Florida Bar No. 0093531

EXHIBIT A TO NOTICE OF DEPOSITION DUCES TECUM FOR EZRA HAUSMAN

1. Your current curriculum vitae.
2. Any final reports prepared by you or at your direction, relating to your services in this docket.
3. Copies of any notes made by you, or provided to you, relating to your opinions or conclusions in this docket, whether you relied on those notes or not.
4. Any photographs or videos taken by you, or provided to you, that you have observed and reviewed in regard to this docket.
5. Any deposition or hearing transcripts provided to you, or parts of deposition transcripts or any other statements or written materials provided to you, which you have examined or will examine in the formulation of your opinions and conclusions in this docket.
6. Any diagrams or drawings made by you or provided to you, which you have examined in regard to this docket.
7. Any statements or affidavits taken by you, at your direction, or provided to you for your review concerning any of the facts which are involved in this docket.
8. Any memoranda or written notice made by you, or provided to you, concerning the subject matter of this docket.
9. Any documents prepared by you, provided to you, or obtained by you or reviewed by you, whether intended for your use or not and whether or not you actually reviewed or relied on those documents, in connection with this docket.
10. All literature and/or documents that you considered relevant to your assignment in this docket and which you considered in the development of your opinions or conclusions concerning the subject matter of the docket.
11. All documents prepared by you to illustrate or demonstrate any fact or opinion considered relevant to this docket and/or to your assignment, investigation, or opinions.
12. Copies of any articles, books, papers, or other publications prepared by you which relate to facts similar to the facts surrounding the subject matter of this docket.
13. Any and all materials considered, consulted, and used by you as a basis or predicate for your opinions and conclusions, including, but not limited to, published reports by any private, non-profit or government agency, textbooks, articles, data, or documents furnished by the party engaging your services, or government or industry standards or regulations.
14. Any and all models or demonstrative tools upon which you have or plan to rely, in the formulation and expression of your opinions and conclusions concerning the subject matter of this docket.

15. A copy of any retainer agreement or other agreement between you and Sierra Club (or counsel for Sierra Club) that sets forth the terms of your engagement in this matter, including, but not limited to, the fees for your services.
16. A copy of all statements, bills, invoices, check stubs, or any other document that reflects payment or compensation, or a request for payment or compensation, for your services in this docket.
17. All marketing materials that market or advertise your expert witness services.
18. A list of all other expert witness services performed for Sierra Club in the last ten years.
19. Copies of all publications, expert reports, depositions, or other documents in which you have discussed renewable energy.

CERTIFICATE OF SERVICE
Docket No. 20170225-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 7th day of December 2017 to the following:

Charles W. Murphy, Esq.
Stephanie Cuello, Esq.
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By: s/ William P. Cox
William P. Cox
Florida Bar No. 0093531