

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to determine need for)
Seminole combined cycle facility, by) DOCKET NO. 20170266-EC
Seminole Electric Cooperative, Inc.)
)

In re: Joint petition for determination)
of need for Shady Hills combined cycle) DOCKET No. 20170267-EC
facility in Pasco County, by Seminole)
Electric Cooperative, Inc. and Shady) SERVED: January 19, 2018
Hills Energy Center, LLC.)
)

QUANTUM PASCO POWER, L.P.'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-4) TO SEMINOLE ELECTRIC COOPERATIVE, INC.

Pursuant to Rule 1.350, Florida Rules of Civil Procedure, and the Order Establishing Procedure in this docket, Quantum Pasco Power, L.P. ("Quantum") hereby requests Seminole Electric Cooperative, Inc. ("Seminole") to produce the Documents requested in paragraphs 1-4 below. Quantum requests that the subject documents be made available for inspection and copying at Gardner, Bist, Bowden, Bush, Dee, LaVia, and Wright, P.A., 1300 Thomaswood Drive, Tallahassee, Florida 32308, on February 5, 2018, at 10:00 A.M. or at some other mutually agreeable date, time, and location.

Quantum acknowledges that some of the documents requested may be confidential, proprietary business documents. Accordingly, Quantum agrees to execute an appropriate confidentiality agreement prior to being granted access to any confidential documents.

Instructions

If Seminole is unable to provide all of the Documents requested below, please provide all of the Documents that Seminole is able to produce and state the reason(s) for Seminole's

inability to produce the remainder of the Documents. If Seminole objects to a request for production, please provide those Documents that can be supplied without objection and state the reason(s) for each objection. If a privilege is claimed with respect to any Document that has been requested, please identify the Document, the topic discussed in the Document, the privilege claimed, and the basis for Seminole's claim of privilege.

Definitions

For the purposes of this request to produce, the following terms shall be defined in the manner set forth below:

A. "Document" is used in the broadest sense and shall mean all written or printed papers or other materials that contain or convey information, including, without limitation, all letters, reports, memoranda, laboratory data, records of telephone or other conversations, intra-office and interoffice communications, correspondence, electronic correspondence (e-mail), handwritten or typewritten notes, diaries, records of every kind, sound recordings, transcripts, contracts, agreements, books, financial statements, books of account, journals, ledgers, invoices, indices, data processing cards, other data processing materials, data sheets, computer modeling input and output files, tapes, photographs, photostats, aerial maps, bulletins, circulars, notices, messages, tabulations, economic or statistical studies,

instructions, requests, calendars, desk pads, appointment books, scrapbooks, notebooks, specifications, drawings, diagrams, sketches, and writings of every kind or character, including preliminary drafts and other copies of the foregoing, however produced or reproduced. "Document" also includes information stored by a computer, whether stored on a hard disk, "floppy" disk, CD ROM, or in any other fashion or manner.

B. "Possession, custody or control" of documents shall mean documents within the actual or constructive possession, custody or control of Seminole.

C. "Seminole" shall mean Seminole Electric Cooperative, Inc Inc., together with its officers, employees, consultants, agents, representatives, attorneys and any other person or entity acting on Seminole's behalf.

D. "Seminole Combined Cycle Facility" or "SCCF" shall mean the natural gas-fired power plant that is at issue in Docket No. 20170266-EC.

E. "Shady Hills" shall mean Shady Hills Energy Center, LLC, its affiliates and subsidiaries, together with its officers, employees, consultants, agents, representatives, attorneys and any other person or entity acting on Shady Hill's behalf.

F. "Shady Hills Combined Cycle Facility" shall mean the natural gas-fired power plant that is at issue in Docket No. 20170267-EC.

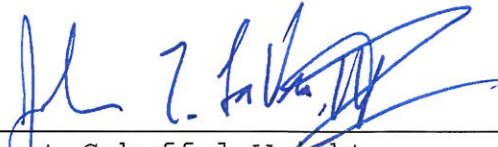
G. "Shady Hills Combustion Turbine Facility" or "SHCTF" shall mean the existing Shady Hills power plant identified in paragraph 11 of the Petition for Determination of Need for Shady Hills Combined Cycle Facility that is at issue in Docket No. 20170267-EC.

H. "Tolling Agreement" shall mean the tolling agreement referenced in paragraph 12 of the Petition for Determination of Need for Shady Hills Combined Cycle Facility.

DOCUMENTS REQUESTED

1. Any and all Documents Seminole relied upon when responding to Quantum's First Set of Interrogatories (Nos. 1-26).
2. Please provide the Tolling Agreement by which Seminole proposes to purchase capacity and energy from the SHCCF.
3. Please provide the purchased power agreement, tolling agreement, and any other agreements, including any amendments thereto, that reflect purchases from the SHCTF by Seminole, for any time period.
4. Please provide all analyses, workpapers, and other documents that show or relate to the scores and rankings shown in Figure 12 of the Seminole Need Study.

Respectfully submitted this 19th day of January 2018.



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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 19th day of January 2018.

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