BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

In re: Joint Petition to determine need for the Shady Hills combined cycle facility, by Seminole Electric Cooperative, Inc. and Shady Hills Energy Center, LLC.

DOCKET NO. 20170267-EC

DATED: February 27, 2018

NOTICE OF TAKING DEPOSITION OF CORPORATE REPRESENTATIVE OF QUANTUM PASCO POWER, L.P.

TO: Robert Scheffel Wright John T. LaVia, III GARDNER, BIST, BOWDEN, BUSH, DEE, LAVIA & WRIGHT, P.A. 1300 Thomaswood Drive Tallahassee, Florida 32308 schef@gbwlegal.com ilavia@gbwlegal.com

Pursuant to Rule 1.310(b)(6), Florida Rules of Civil Procedure, notice is hereby given that Seminole Electric Cooperative, Inc., will take the telephonic deposition of the corporate representative of Quantum Pasco Power, L.P. (Quantum). In accordance with Rule 1.310(b)(6), Quantum is required to select one or more officers, directors, managers, agents, or other persons that have been adequately prepared to testify on behalf of Quantum about the following subject matter:

Information pertaining to the allegation in paragraph 11 of the Motion to Intervene of Quantum Paso Power, L.P. that "[a]t this point in time, Seminole is the only realistic potential counterparty, such that it is highly likely that, absent a reasonable business arrangement with Seminole, the Pasco Facility will be removed from service from the Florida grid."

The deposition will commence on March 6, 2018, 3:30 PM or as soon thereafter as possible at 24 Waterway Avenue, Suite 800, The Woodlands, Texas 77380 and will continue from day to day until completed.

The deposition shall be taken telephonically 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 hearing, 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 telephonic conference line is available if a party wishes to participate telephonically. The telephone number for the conference line is 1-888-508-8513, and the passcode is 695810#.

Please govern yourselves accordingly.

RESPECTFULLY SUBMITTED this <u>27th</u> day of February, 2018.

HOPPING GREEN & SAMS, P.A.

By: /s/Gary V. Perko Gary V. Perko, Esquire Brooke E. Lewis Malcolm N. Means Florida Bar No. 855898 P.O. Box 6526 Tallahassee, FL 32301

(850) 222-7500

Attorneys for Petitioner, SEMINOLE ELECTRIC COOPERATIVE, INC.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via electronic mail to the following on this <u>27th</u> day of February, 2018:

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/s/Gary V. Perko Attorney