

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Re: Petition for rate increase and approval of  
depreciation study by Florida City Gas

DOCKET NO. 20170179-GU

FILED February 27, 2018

**CROSS-NOTICE OF TELEPHONIC DEPOSITION DUCES TECUM**

TO: Walt Trierweiler, Esq.  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
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NOTICE is hereby given that pursuant to Rule 28-106.206 Florida Administrative Code, and Florida Rule of Civil Procedure 1.310 the Office of Public Counsel will take the telephonic deposition of the following named individual at the location and time indicated below:

NAME	DATE and TIME	LOCATION
Mr. Greg Becker	Thursday, March 8, 2018 1:00 p.m.	Room 382D Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

The deponent is requested to have with him copies of his pre-filed testimony and schedules, all the work papers or other materials used by him in the preparation of any testimony filed in this case or used by him in the preparation of any responses to discovery requests in this docket, all discovery responses and MFR schedules for which he is primarily responsible, all work papers or

other materials he prepared in connection with Docket No. 20170179-GU, the documents listed on Attachment A, and any other documents identified by the undersigned prior to the deposition.

The deposition is being taken for purposes of discovery, for use at trial, and for any other purposes allowed under the Florida Rules of Civil Procedure, the Uniform Rules of Procedure and the Rules of the Florida Public Service Commission.

Please govern yourselves accordingly.

J.R. KELLY  
PUBLIC COUNSEL



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Attorneys for the Citizens of the  
State of Florida

**CERTIFICATE OF SERVICE**  
**Docket No. 20170179-GU**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 27th day of February, 2018, to the following:

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Stephanie A. Morse  
Associate Public Counsel

**DUCES TECUM DOCUMENTS LIST**

Note: For purposes of this list, "the Company" means Florida City Gas.

1. Electronic copies of all schedules, exhibits, tables, figures, and attachments included with the Greg Becker's Rebuttal Filing; please provide the requested documents in electronic form with all links and formulas intact, source data used, and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, please provide the information in the form that most closely matches what has been requested.
2. Please refer to the Rebuttal Testimony of Gregory Becker, page 24 lines 20 through 22, where he stated that, "[s]ince 2015, the Company has evaluated Capacity options on Sabal Trail, Southeast Connection, Gulfstream, FGT and purchasing or building an LNG facility," and produce the following:
  - a. All documents, reports, analyses, presentations (including those to management or investors), emails and other correspondence since January 1, 2015 that discuss the Company's evaluation of Capacity options on the Sabal Trail pipeline. Provide the requested documents in electronic format with all formulas and linked spreadsheets intact source data used, and explain all assumptions and calculations used.
  - b. All documents, reports, analyses, presentations (including those to management or investors), emails and other correspondence since January 1, 2015 that discuss the Company's evaluation of Capacity options on the Southeast Connection pipeline. Provide the requested documents in electronic format with all formulas and linked spreadsheets intact source data used, and explain all assumptions and calculations used.
  - c. All documents, reports, analyses, presentations (including those to management or investors), emails and other correspondence since January 1, 2015 that discuss the Company's evaluation of Capacity options on the Gulfstream pipeline. Provide the requested documents in electronic format with all formulas and linked spreadsheets intact source data used, and explain all assumptions and calculations used.
3. Please refer to the Company's Rules and Regulations, sec. 18, and produce the following:

- a. Any and all documents related to penalties the Company has assessed on transportation service customers and Third Party Suppliers since January 1, 2013, including, but not limited to, documents which reflect (1) the name(s) of the party(ies) upon whom the Company assessed a penalty, (2) the quantity of unauthorized gas use, and (3) the total amount of penalized unauthorized gas use. Provide the requested documents in electronic format with all formulas and linked spreadsheets intact source data used, and explain all assumptions and calculations used.
- b. All documents, reports, analyses, presentations (including those to management or investors), emails and other correspondence since January 1, 2013, that discuss unauthorized use by transportation service customers and/or Third Party Suppliers on the Company's system.