

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost Recovery Clause

Docket No. 20180007-EI

Filed: October 18, 2018

**FLORIDA POWER & LIGHT COMPANY'S
NOTICE OF WITNESSES' SUBJECT MATTER EXPERTISE**

Florida Power & Light Company ("FPL") hereby files this Notice of Expert Subject Matter Designations in response to the objection set forth in Section H of the Florida Industrial Power Users Group's ("FIPUG") prehearing statement filed October 15, 2018. FIPUG lodges an objection to the qualification of witnesses as an expert "unless the witness in question affirmatively states the subject matter area(s) in which he or she claims expertise." FIPUG's objection fails to comply with the requirements of the Order Establishing Procedure as it fails to "identify each witness the party wishes to voir dire as well as state with specificity the portions of that witness' prefiled testimony, by page and line number, and/or exhibits, by page and line number, to which the party objects." Order No. PSC-2018-0090-PCO-EI, at 6. FPL believes that its prehearing statement and the prefiled testimony of each FPL witness provides adequate notice of each witness's area of expertise. Nonetheless, as further clarification, FPL proffers this notice as an affirmative statement of the subject matter of its witnesses' expertise for the purpose of this proceeding. If required by the Chairman, FPL's witnesses are prepared to confirm the statements of expertise in this notice when they take the stand.

1. Renae B. Deaton is qualified as an expert through her knowledge, skill, education, training and experience. Ms. Deaton will testify as an expert on the subject matters of Issue Nos. 1-8, 10d and 13: regulatory treatment for historical and projected costs and implementation of, and calculations associated with, the Commission's environmental cost recovery factors; the

appropriate effective date of environmental cost recovery factors for 2019; and the tariff approval process.

2. Michael W. Sole is qualified as an expert through his knowledge, skill, education, training and experience. Mr. Sole will testify as an expert on the subject matters of Issue Nos. 1-4, 10a-10c and 10e: reasonableness and prudence of environmental compliance activities and projected environmental cost recovery amounts to be collected during 2019.

Respectfully submitted this 18th day of October 2018.

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CERTIFICATE OF SERVICE
Docket No. 20180007-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic delivery on this 18th day of October 2018 to the following:

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