

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Evaluation of storm restoration costs for Florida Power & light Company related to Hurricane Irma. || DOCKET NO. 20180049-EI
|| DATED: November 13, 2018

STAFF’S CROSS-NOTICE OF DEPOSITION DUCES TECUM

TO: Kenneth M. Rubin
Kevin I. C. Donaldson,
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, Florida 33418
Ken.rubin@fpl.com
kevin.donaldson@fpl.com

NOTICE is hereby given that the Staff of the Florida Public Service Commission will take the deposition of the following named individuals at the following location and time indicated:

NAME	DATE and TIME	LOCATION
FPL Corporate Representative, or Panel of Corporate Representatives, as described below.	Thursday, Nov. 15, 2018 9:30 A.M.	Florida Power & Light Company 700 Universe Blvd. Juno Beach, Florida 33408-0420

Upon oral examination before an official court reporter or other officer authorized by law to take depositions. The oral examination will continue from day to day until completed.

Please produce as a corporate representative the person or persons having overall responsibility and knowledge about the management and oversight of non-FPL line crew vendor contracts and contract compliance and FPL’s maintenance and organization, in any accounting system (including, but not limited to, SAP), of the non-FPL line crew vendor invoices submitted for restoration work performed in the immediate aftermath of Hurricane Irma (including but not limited to the actual preparation of the invoice (including the format used by the vendor and the format used or required by FPL and how FPL controls or regulates the invoice being ultimately submitted for payment) and the person or persons having overall responsibility and knowledge about FPL’s review and processing of the invoices for payment, including verification of the correctness of the billing and appropriateness of payment by FPL pursuant to the contractual arrangement that governs the rights and obligations of the vendor and FPL. A panel of representatives may be produced.

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The deponent is requested to bring the documents which comprise or outline any and all agreements between FPL and each line crew contractor involved in restoration work related to Hurricane Irma for FPL, including documents which reference or relate to rates, pricing, payment terms, and terms governing the engagement and payment of line crews, from the time travel and services were requested by FPL (mobilization and work), through the time FPL released each respective line crew from service and/or demobilization was completed. The documents to be brought to the deposition include, but are not limited to, contract(s), mutual assistance agreement(s), vendor contracts and commitments (discussed in the August 31, 2018 testimony of Manuel B. Miranda, p.6, line 7), term sheets and purchase orders, covering each of the line crew contractors involved in restoration work regarding Hurricane Irma for FPL.

This 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. A telephonic conference line will be made available if a party wishes to participate telephonically and has made arrangements to view confidential information.

In accordance with the Americans with Disabilities Act, persons needing a special accommodation to participate at this proceeding should contact the Office of Commission Clerk no later than five days prior to the deposition at 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.

/s/ Suzanne Brownless

Suzanne Brownless
Special Counsel, Office of the General Counsel

FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
sbrownle@psc.state.fl.us
(850) 413-6218

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that Staff's Cross-Notice of Deposition Duces Tecum was served by electronic mail to Kenneth M. Rubin and Kevin I.C. Donaldson, Florida Power & Light Company, 700 Universe Blvd., Juno Beach, Florida 33408-0420, ken.rubin@fpl.com, kevin.donaldson@fpl.com, and that a true copy was furnished to the following by electronic mail on this 13th day of November, 2018:

Robert Scheffel Wright/ John T. LaVia
Gardner Law Firm
1300 Thomaswood Drive
Tallahassee, FL 32308
jlavia@gbwlegal.com
schef@gbwlegal.com

Jon C. Moyle, Jr./ Karen A. Putnal
Moyle Law Firm, PA
118 N. Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com

Ken Hoffman
Florida Power & Light Company
134 West Jefferson Street
Tallahassee, FL 32301
Ken.hoffman@fpl.com

Stephanie Morse
Patricia A. Christensen
Office of the Public Counsel
c/o Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
morse.stephanie@leg.state.fl.us
Christensen.p@leg.state.fl.us

/s/ Suzanne Brownless

Suzanne Brownless
Special Counsel, Office of the General Counsel
FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
sbrownle@psc.state.fl.us
(850) 413-6218