

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 14, 2018

FLORIDA RETAIL FEDERATION'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 Florida Retail Federation 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

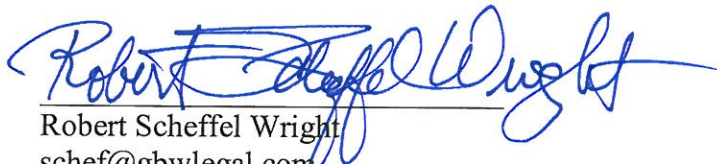
Upon oral examination before an official court reporter or other officer authorized by law to take depositions. The oral examination will continue from day to day until completed.

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.

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.

Please govern yourselves accordingly.



Robert Scheffel Wright
schef@gbwlegal.com

Gardner, Bist, Bowden, Bush, Dee, LaVia & Wright, P.A.
1300 Thomaswood Drive
Tallahassee, Florida 32308
Telephone (850) 385-0070
Facsimile (850) 385-5416

Attorneys for the Florida Retail Federation

CERTIFICATE OF SERVICE
Docket No. 20180049-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 14th day of November, 2018, to the following:

Suzanne Brownless/Ashley Weisenfeld
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
sbrownle@psc.state.fl.us
awaisenf@psc.state.fl.us

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

Ken Hoffman
Florida Power & Light Company
215 South Monroe Street, Suite 810
Tallahassee FL 32301
ken.hoffman@fpl.com

Jon C. Moyle, Jr./Karen A. Putnal
c/o Moyle Law Firm, PA
Florida Industrial Power Users Group
118 North Gadsden Street
Tallahassee FL 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com

Kenneth M. Rubin/I.C. Donaldson
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, Florida 33408-0420
ken.rubin@fpl.com
kevin.donaldson@fpl.com


Attorney