

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

FILED: November 28, 2018

NOTICE OF TELEPHONIC DEPOSITION DUCES TECUM (CONTINUED)

TO: Kenneth M. Rubin
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, FL 33418
ken.rubin@fpl.com

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 deposition of the following named individuals at the location and time indicated below:

NAME	DATE and TIME	LOCATION
FPL Corporate Representative Panel: Thomas Gwaltney Kristin Manz Ray Lozano	Thursday, Dec. 13, 2018 9:00 A.M.	Florida Power & Light Company 700 Universe Blvd. Juno Beach, Florida 33408-0420

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 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.

A telephonic conference line will be made available if a party wishes to participate telephonically and has made arrangements to view confidential information. This deposition shall be taken 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 trial, and for any other purposes allowed under the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

Please govern yourselves accordingly.

Respectfully Submitted

J.R. KELLY
PUBLIC COUNSEL

/s/ Stephanie A. Morse
Stephanie Morse
Associate Public Counsel

Patricia A. Christensen
Associate Public Counsel

Charles J. Rehwinkel
Deputy Public Counsel

Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
(850) 488-9330

Attorneys for the Citizens
of the State of Florida

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 28th 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

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

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

/s/Stephanie A. Morse
Stephanie A. Morse
Associate Public Counsel
Florida. Bar No. 0068713