

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: April 30, 2019

NOTICE OF TELEPHONIC DEPOSITION DUCES TECUM

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 individual at the location and time indicated below:

| NAME | DATE and TIME | LOCATION |
|-------------------|-------------------------------------|---|
| Manuel B. Miranda | Thursday, May 16, 2019 7:00 A.M. | Florida Power & Light Company 700 Universe Blvd. Juno Beach, Florida 33408-0420 |

The deponent is requested to bring the following documents:

1. Any and all documents related to analyses personally performed by Mr. Miranda or analyses that was performed by FPL and reviewed by Mr. Miranda, that would support his statement that selecting contractor restoration resources, ultimately, would be costlier (e.g., selecting a contractor just under the alleged hourly labor rate cap but considerably farther away resulting in more mobilization/demobilization costs) and extend restoration times because of a scarcity of contractors willing and able to perform the work at what Mr. Miranda describes as an arbitrary rate limit. (Miranda Rebuttal Testimony, p. 7, lines 7-12.)
2. Any and all documents related to Mr. Miranda's review, if any, of the travel and standby times of contractors performing storm restoration in states other than Florida.

3. Any and all documents related to Mr. Miranda's review, if any, of the travel and standby times of contractors performing storm restoration in Florida outside of FPL's territory.

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 oral examination will continue from day to day until completed. The deposition is being taken for purposes of discovery, for use at hearing and/or trial, and for any other purposes allowed under the Florida Rules of Civil Procedure and any Rules applicable to the Florida Public Service Commission.

Please govern yourselves accordingly.

Respectfully Submitted
J.R. KELLY
PUBLIC COUNSEL

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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 30th day of April, 2019, to the following:

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