

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power
Cost Recovery Clause with
Generating Performance Incentive
Factor

DOCKET NO. 20190001-EI

FILED: August 21, 2019

NOTICE OF CONFIDENTIAL DEPOSITION DUCES TECUM

TO: Duke Energy Florida, LLC
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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
Duke Energy Florida, LLC (DEF) Corporate Representative, or Panel of Corporate Representatives, as described below.	Friday, August 30, 2019 8:30 A.M.	Duke Energy Florida, LLC 299 First Avenue North St. Petersburg, FL 33701

Please produce as a corporate representative the following person or persons:

1. The seven (7) individuals comprising the Root Cause Analysis Team (“Team”) referenced in the testimony of DEF witness Jeffery Swartz, found in Vol. III, at P. 407, Lines 21-2, of the transcript of the Hearing from November 5, 2018.

Each deponent is requested to bring the documents which are related to his or her role(s) in the analysis and resolution of the operational problems at the root of the Bartow Plant outage issues. Please

also bring a copy of each preliminary, interim and final report (including any revised or updated final report) generated by the Team, including drafts circulated within and outside the Team for review and comment. Please also bring all workpapers, analysis, memoranda, supporting documentation (including documents relied upon, consulted and referenced in the development and preparation of the reports generated by the Team. The term “report” includes any document that the Team produced that contained a recommendation for action.

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/ Thomas A. (Tad) David
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Attorneys for the Citizens
of the State of Florida

CERTIFICATE OF SERVICE
Docket No. 20190001-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 21st day of August, 2019, to the following:

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