

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by
Peoples Gas System

DOCKET NO.: 20200051-GU

In re: Petition for approval of tariff
Modifications for liquefied natural gas
Service by Peoples Gas System

DOCKET NO.: 20200093-GU

FILED: August 14, 2020

**THE FLORIDA INDUSTRIAL POWER USERS GROUP'S
CROSS NOTICE OF TAKING DEPOSITION DUCES TECUM**

TO: ALL PARTIES

Pursuant to Rule 1.310, Florida Rules of Civil Procedure, notice is hereby given that the Florida Industrial Power Users Group (FIPUG) will take the deposition of the following named individual(s).

NAME	DATE AND TIME	ADDRESS
Timothy O'Connor	August 21, 2020 8:30 am	Via Zoom Link

The deponent is instructed to bring with him/her to the deposition:

1. Any territorial agreements for Miami-Dade County.
2. Any agreements for LNG services with a governmental entity.
3. Any agreements for LNG services with a third party.
4. All documents supporting the four growth projects outlined in the witness' direct testimony.
5. Any plans approved by management and the Tampa Electric and Emera Board related to Liquefied Natural Gas facilities in Miami and Jacksonville and the related expansion projects.

6. Discovery responses in Docket No. 20200093.
7. His prefiled testimony in Docket No. 20200051, his co-sponsored MFR schedules and any associated workpapers supporting the testimony and the co-sponsored MFR schedules.

The deposition will 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, or for any other purposes allowed under the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

/s/ Jon. C. Moyle _____

Jon C. Moyle, Jr.
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
(850) 681-3828 (Voice)
(850) 681-8788 (Facsimile)
jmoyle@moylelaw.com

Attorneys for Florida Industrial Power Users Group

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail this 14th day of August 2020 to the following:

Suzanne Brownless
Bianca Lherisson
Jennifer Crawford
Kurt Schrader
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
sbrownle@psc.state.fl.us
BLheriss@psc.state.fl.us
jcrawfor@psc.state.fl.us
kschrade@psc.state.fl.us

J.R. Kelly
Charles J. Rehwinkel
Office of Public Counsel
111 West Madison Street, room 812
Tallahassee, FL 32301
Kelly.jr@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us

Matthew R. Bernier, Esq.
Duke Energy Florida
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
matthew.bernier@duke-energy.com

Dianne M. Triplett
Duke Energy Florida
299 First Avenue North
St. Petersburg, Florida 33701
Diane.triplett@duke-energy.com

Daniel Hernandez
Nicole Zaworska
Shutts Law Firm
4301 W. Boy Scout Blvd., Suite 300
Tampa, FL 33607
DHernandez@shutts.com
DEF-CR3@shutts.com
NZaworska@shutts.com

Ms. Paula K. Brown
Peoples Gas System
Regulatory Affairs
P. O. Box 111
Tampa FL 33601-0111
regdept@tecoenergy.com

Ms. Kandi M. Floyd
Director, Regulatory Affairs
Peoples Gas System
P. O. Box 111
Tampa, Florida 33601-0111
kfloyd@tecoenergy.com

Andrew M. Brown
Thomas R. Fariior
Macfarlane Ferguson & McMullen
P. O. Box 1531
Tampa, Florida 33601-1531
ab@macfar.com

/s/ Jon C. Moyle, Jr.
Jon C. Moyle, Jr.