

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida Power & Light Company.	DOCKET NO. 20210015-EI DATED: July 19, 2021
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NOTICE OF REMOTE DEPOSITION DUCES TECUM

TO: Wade Litchfield/John Burnett
Maria Moncada
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NOTICE is hereby given that Intervenor Florida Internet & Television, Inc. will take the deposition of the representative or representatives of Florida Power & Light Company pursuant to Rule 28-106.206, F.A.C., and Rule 1.310(b)(6), Fla. R. Civ. P., on the matters set forth in Exhibit A hereto at the following location and time indicated, upon oral examination before an official court reporter or other officer authorized by law to take depositions:

NAME	DATE and TIME	LOCATION
FPL Rule 1.310(b)(6) representative(s)	August 5, 2021 at 9:30 a.m. (EDT)	Berger Singerman LLP 313 North Monroe St., Suite 301 Tallahassee, FL 32301 (Via Zoom)

DOCUMENTS REQUESTED

The Witness should bring all work papers and other materials supporting, or used in the preparation of, pre-filed testimony and exhibits submitted in this docket, and any documents produced by FPL in response to FIT's First and Second sets of Document Requests to the extent relevant to the topics in Exhibit A.

This deposition is being taken for purposes of discovery, for use at hearing, 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.

Please govern yourselves accordingly.

Respectfully submitted,

/s/ Floyd R. Self

Floyd R. Self, B.C.S. (Fla. Bar No. 608025)

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*Attorneys for Florida Internet and Television
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of foregoing has been served by electronic mail to the following on this 19th day of July, 2021:

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/s/ Floyd R. Self
Floyd R. Self

CERTIFICATE OF OATH

STATE OF _____

COUNTY OF _____

I, the undersigned authority, certify that _____ personally appeared before me at _____ and was duly sworn by me to tell the truth.

WITNESS my hand and official seal in the City of _____, County of _____, State of _____, this _____ day of _____, 2021.

Notary Public
State of _____

Personally known _____ OR produced identification _____

Type of identification produced _____.

EXHIBIT A

(List of deposition matters pursuant to Rule 1.130(b)(6))

1. FPL's distribution pole attachment rental rates for 2020, 2021, 2022, 2023.
2. FPL's projection of pole attachment rental revenue for test years 2020, 2022, 2023 as set forth in MFR, 2022 test year, Vol. 3 of 8, Section C, referring to Account No. 454 Rent from Electric Property – Pole Attachments and MFR, 2023 test year, Vol. 3 of 8, Section C, referring to Account No. 454 Rent from Electric Property – Pole Attachments.
3. The methodology and/or formula used by FPL to calculate its distribution pole attachment rental rate for 2019, 2020, and 2021, and for the projected test years 2022 and 2023.
4. For the years 2019, 2020, and 2021 as of June 30, 2021, the pole height for the following categories of poles booked to FPL's Account 364 or in FPL's continuing property records:
 - Wood Poles;
 - Non-wood Poles (Concrete, Steel, Composite).
5. The treatment of depreciation in the calculation of FPL's distribution pole attachment rental rates for 2019, 2020, 2021, 2022, and 2023.
6. FPL's replacement of existing distribution poles with taller poles since the implementation of FPL's pole hardening plan in 2007.
7. Referring to MFR, 2022 test year, Vol. 3 of 8, Section C, references to Account No. 454 Rent from Electric Property – Pole Attachments for historical test year 2020, the basis for the distribution pole rent revenue projections in the referenced MFR, including but not limited to:
 - The formula or other method used to calculate the annual pole attachment rental rate that underlies the projection;
 - The cost year upon which the data and other inputs used in the calculation of the rental rate were based;

- The treatment of accumulated deferred taxes in calculating the annual pole rental rate, including how the amounts of excess accumulated deferred taxes created by the TCJA of 2017 were treated;
- The number of pole attachment billing units;
- The rate year upon which the number of billing units reflected in the projection were based, and any assumptions used to adjust or project billing units that may have been made;
- A breakdown of the make-ready or non-recurring charges and fees included in the projections;
- Whether the pole rent revenue projections included payments from all joint users, joint owners, third parties, or private parties with attachments on FPL poles;
- total pole attachment revenues.

8. Referring to MFR, 2022 test year, Vol. 3 of 8, Section C, referring to Account No. 454 Rent from Electric Property – Pole Attachments for test year 2022, the basis for the distribution pole rent revenue projections in the referenced MFR, including but not limited to:

- The formula or other method used to calculate the annual pole attachment rental rate that underlies the projection;
- The cost year upon which the data and other inputs used in the calculation of the rental rate were based;
- The treatment of accumulated deferred taxes in calculating the annual pole rental rate, including how the amounts of excess accumulated deferred taxes created by the TCJA of 2017 were treated;
- The number of pole attachment billing units;
- The rate year upon which the number of billing units reflected in the projection were based, and any assumptions used to adjust or project billing units that may have been made;
- A breakdown of the make-ready or non-recurring charges and fees included in the projections;
- Whether the pole rent revenue projections included payments from all joint users, joint owners, third parties, or private parties with attachments on FPL poles;
- total pole attachment revenues.

9. Referring to MFR, 2023 test year, Vol. 3 of 8, Section C, referring to Account No. 454 Rent from Electric Property – Pole Attachments for test year 2023, the basis for the distribution pole rent revenue projections in the referenced MFR, including but not limited to:

- The formula or other method used to calculate the annual pole attachment rental rate that underlies the projection;

- The cost year upon which the data and other inputs used in the calculation of the rental rate were based;
- The treatment of accumulated deferred taxes in calculating the annual pole rental rate, including how the amounts of excess accumulated deferred taxes created by the TCJA of 2017 were treated;
- The number of pole attachment billing units;
- The rate year upon which the number of billing units reflected in the projection were based, and any assumptions used to adjust or project billing units that may have been made;
- A breakdown of the make-ready or non-recurring charges and fees included in the projections;
- Whether the pole rent revenue projections included payments from all joint users, joint owners, third parties, or private parties with attachments on FPL poles;
- total pole attachment revenues.

10. For each of the years 2019-2020, and for the year 2021 through June 30, 2021, the total accumulated cost and number of units for each item listed below, including appurtenances, recorded in FPL's FERC Account 364 for Poles, towers, and fixtures under 18 C.F.R. Pt. 101, and all additional items, if any, included under FERC Account 364 in FPL's FERC Form 1:

- Anchors, head arms, and other guys, including guy guards, guy clamps, strain insulators, pole plates, etc.;
- Brackets;
- Crossarms and braces;
- Excavation and backfill, including the disposal or excess excavated material;
- Extension arms;
- Foundations;
- Guards;
- Insulator pins and suspension bolts;
- Paving;
- Permits for construction;
- Pole steps and ladders;
- Poles, wood, steel, concrete or other material;
- Racks complete with insulators;
- Railings;
- Reinforcing and stubbing;
- Settings;
- Shaving, painting, gaining, roofing, stenciling, and tagging;
- Towers;
- Transformer racks and platforms.

11. For the years 2019, 2020, 2021, and the test years 2022 and 2023, the treatment of accumulated deferred taxes included in FPL's calculation of the annual distribution pole attachment rental rate.

12. Intercorporate cost allocations between FPL or Gulf and any parent or subsidiary thereof that affected or may affect administrative and general expense accounts (accounts 920 through 935) included in the FCC's formula for calculating pole attachment rates for the years 2019 to 2020 and as forecasted by FPL in this proceeding.