

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and purchased power  
cost recovery clause and generating  
performance incentive factor.

Docket No. 20230001-EI  
Filed: February 23, 2023

**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, cross notice is hereby given that the Florida Industrial Power Users Group (FIPUG) reserves the right to take the deposition of the following named individual(s).

NAME	DATE AND TIME	ADDRESS
Designated Company Representative (s) for Florida Power & Light Company	Tuesday, February 28, 2023 at 9:00 a.m.	Via Video Conference (Link will be circulated to witness and counsel prior to deposition)
Designated Company Representative (s) for Tampa Electric Company	Tuesday, February 28, 2023 at 1:00 p.m.	Via Video Conference (Link will be circulated to witness and counsel prior to deposition)
Designated Company Representative (s) for Duke Energy Florida, LLC	Wednesday, March 1, 2023 at 9:00 a.m.	Via Video Conference (Link will be circulated to witness and counsel prior to deposition)

The deponent is instructed to bring with him/her to the deposition any and all documents, photographs, workpapers, memorandums, correspondence, related to this matter which the witness possesses, or has received, referenced, relied upon or which was supplied to the witness by any person or party in connection with this matter or which was supplied by the witness to any person or party in connection with this matter.

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.  
Karen A. Putnal  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, Florida 32301  
Telephone: (850)681-3828  
Facsimile: (850)681-8788  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)  
[kputnal@moylelaw.com](mailto:kputnal@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 23rd day of February, 2023, to the following:

Keith Hetrick  
Suzanne S. Brownless  
Special Counsel  
Office of the General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[khetrick@psc.state.fl.us](mailto:khetrick@psc.state.fl.us)  
[sbrownle@psc.state.fl.us](mailto:sbrownle@psc.state.fl.us)

Charles Rehwinkel  
Patricia A. Christensen  
Mary Wessling  
Office of Public Counsel  
111 West Madison Street – Room 812  
Tallahassee, FL 32399-1400  
[gentry.richard@leg.state.fl.us](mailto:gentry.richard@leg.state.fl.us)  
[christensen.patty@leg.state.fl.us](mailto:christensen.patty@leg.state.fl.us)  
[Wessling.mary@leg.state.fl.us](mailto:Wessling.mary@leg.state.fl.us)

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 S. Monroe St., Suite 601  
Tallahassee, FL 32301  
[bkeating@gunster.com](mailto:bkeating@gunster.com)

Maria Jose Moncada  
Senior Attorney  
Joel T. Baker  
Principal Attorney  
Florida Power & Light Company  
700 Universe Boulevard (LAW/JB)  
Juno Beach, FL 33408-0420  
[maria.moncada@fpl.com](mailto:maria.moncada@fpl.com)  
[joel.baker@fpl.com](mailto:joel.baker@fpl.com)

Kenneth Hoffman  
Vice President, Regulatory Relations  
Florida Power & Light Company  
215 South Monroe Street, Suite 810  
Tallahassee, FL 32301-1859  
[ken.hoffman@fpl.com](mailto:ken.hoffman@fpl.com)

Dianne M. Triplett  
Associate General Counsel  
Duke Energy Florida, LLC  
299 First Avenue North  
St. Petersburg, FL 33701  
Dianne.triplett@duke-energy.com  
FLRegulatoryLegal@duke-energy.com

Matthew R. Bernier  
Senior Counsel  
Duke Energy Florida, LLC  
106 East College Avenue, Suite 800  
Tallahassee, FL 32301-7740  
Matthew.bernier@duke-energy.com

J. Jeffrey Wahlen  
Malcolm Means  
Virginia Ponder  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, Florida 32302  
jwahlen@ausley.com  
mmeans@ausley.com  
vponder@ausley.com

Mike Cassel  
Regulatory and Governmental Affairs  
Florida Public Utilities Company  
Florida Division of Chesapeake Utilities Corp.  
1750 SW 14th Street, Suite 200  
Fernandina Beach, FL 32034  
mcassel@fpuc.com

Michelle D. Napier  
Florida Public Utilities Company  
1635 Meathe Drive  
West Palm Beach, FL. 33411  
mnapier@fpuc.com

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