BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition for Determination of Need for Proposed Electrical Power Plant and Related Facilities, Indiantown Project, by Florida Power and Light and Indiantown Cogeneration, L.P.

DOCKET NO. 900709-EQ

ORIGINAL FILE COPY

In re: Petition for Approval of Cogeneration Agreement Between Florida Power and Light Company and Indiantown Cogeneration, L.P. DOCKET NO. 900731-EQ

In re: Petition of Florida Power and Light Company for Inclusion of the Scherer Unit No. 4 Purchase in Rate Base, Including an Acquisition Adjustment DOCKET NO. 900796-EI Filed: November 27, 1990

AMENDED NOTICE OF DEPOSITION DUCES TECUM

TO: Charles Guyton
Steel Hector and Davis
215 South Monroe Street
Suite 601
Tallahassee, Florida 32301

PLEASE TAKE NOTICE that pursuant to rule 1.310, Florida Rules of Civil Procedure, and rule 25-22.034, Florida Administrative Code, Nassau Power Corporation, by and through its undersigned counsel, will take the sworn deposition upon oral examination of G.R. CEPERO, witness for Florida Power and Light, for the purpose of discovery, for use at hearing, and for such other purposes as are permitted by the Florida Rules of Civil Procedure. This notice

was served on all parties to these dockets on November 26, 1990. The only addition is document request number 9 and a change in the starting time of the deposition.

The deposition will be taken at the following time and place, or at such other time and place as may be mutually agreed by counsel:

DATE AND TIME: Monday, December 3, 1990; 11:00 a.m.

LOCATION: Steel Hector and Davis 215 South Monroe Street Suite 601 Tallahassee, Florida 32301

The deponent should bring with him to the deposition the following documents:

- All workpapers from which the calculations on Table 21-1,
 21-2 and 21-3 included in FPL's response to Staff's First Set of Interrogatories, Interrogatory 21, Docket Nos. 900709-EQ, 900731-EQ, were derived.
- 2. All workpapers, documents and analyses which support the \$73 million figure referred to on page 29, line 7 of Mr. Cepero's prefiled testimony in Docket Nos. 900709-EQ, 900731-EQ.
- 3. All workpapers, documents and analyses which quantify the "value" of the provisions of the ICL contract to FPL in Docket Nos. 900709-EQ, 900731-EQ.
- 4. All workpapers supporting FPL's response to Staff's First Set of Interrogatories, Interrogatory 5, in Docket Nos. 900709-EQ, 900731-EQ.

- 5. All workpapers supporting FPL's response to Staff's First Set of Interrogatories, Interrogatory 6, in Docket Nos. 900709-EQ, 900731-EQ.
- 6. All documents supporting the statement in FPL's response to Staff's First Set of Interrogatories, Interrogatory 21, referencing "the volatility in both supply and price inherent in premium fuels like natural gas . . . ", in Docket Nos. 900709-EQ, 900731-EQ.
- 7. All workpapers supporting the \$58 million savings referred to on page 66 of Exhibit 1 of joint petition in Docket No. 900709-EQ.
- 8. All analyses, studies, memoranda and all other documents relating to:
 - (a) the difference between the yearly amounts to be paid to ICL and FPL's avoided cost for the same time frames;
 - (b) the amount of the maximum potential termination fee which would be in excess of the maximum security provisions of the contract.

9. All documents related to the "due diligence" investigations referred to on page 13, lines 15-19 of Mr. Cepero's testimony in Docket No. 900796-EI.

Joseph A. McGlothlin
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and Reeves
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Attorneys for Nassau Power Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Amended Notice of Deposition Duces Tecum has been furnished by hand delivery* or by U.S. mail to the following parties of record this 27th day of November, 1990:

Mike Palecki*
Bob Elias*
Ed Tellechea*
Bob Christ*
Fla. Public Service Commission
Division of Legal Services
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