

Marguerite McLean

090539-GU

From: Suarez, Lourdes C. (CAO) [LCS@miamidade.gov]
Sent: Wednesday, March 23, 2011 12:12 PM
To: Filings@psc.state.fl.us
Cc: Anna Williams; Martha Brown; fself@lawfla.com; Spierce@aglresources.com; Gillman, Henry (CAO); Hope, David (CAO); Paxton, Lucinda (CAO)
Subject: Docket No. 090539-GU

Attachments: 2011-03-23, 090539-GU, Amended Notice of Deposition - Carolyn Bermudez.pdf

a) The name, address, telephone number and email for the person responsible for the filing is:

David Stephen Hope
Assistant County Attorney
Miami-Dade County Attorney's Office
Stephen P. Clark Center
111 N.W. First Street, Suite 2800
Miami, Florida 33128-1993
(305) 375-5151
Dhope@miamidade.gov

- b) The filing is made in Docket No. 090539-GU
- c) The document is filed on behalf of Miami-Dade County
- d) The total pages in the document are 3 pages
- e) The attached document is Miami-Dade County's Amended Notice of Deposition

Lourdes C. Suarez
Miami-Dade County Attorney's Office
111 N.W. 1 Street, Suite 2810
Office: 305-375-4291
Fax: 305-375-5634

DOCUMENT NUMBER-DATE

01926 MAR 23 =

FPSC-COMMISSION CLERK

3/23/2011

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of Special Gas)
Transportation Service agreement with)
Florida City Gas by Miami-Dade County)
Through Miami-Dade Water and Sewer)
Department)

Docket No. 090539-GU

**MIAMI-DADE COUNTY'S AMENDED
NOTICE OF DEPOSITION DUCES TECUM**

To: Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
2618 Centennial Place
Tallahassee, Florida 32308

NOTICE is hereby given that Miami-Dade County will take the deposition duces tecum of the following named individual at the following location and time indicated:

Carolyn Bermudez	Wed. March 30, 2011 and Thurs. March 31, 2011 at 10:00 a.m.	Location: Stephen P. Clark Center County Attorney's Office 111 N.W. First Street Suite 2810 - Conf. Rm. A Miami, Florida 33128-1993
------------------	---	--

Upon oral examination before an official court reporter or other officer authorized by law to take depositions.

The deponent is requested to have with her all documents listed on the attached Schedule A, as well as her direct testimony and exhibits.

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 Procedures and the Rules of the Florida Public Service Commission.

Please govern yourself accordingly.

OFFICE OF COUNTY ATTORNEY, MIAMI-DADE COUNTY, FLORIDA
TELEPHONE (305) 375-5151

DOCUMENT NUMBER - DATE

01926 MAR 23 =

FPSC-COMMISSION CLERK

*In re: Petition for approval of Special Gas Transportation Agreement
Docket No. 090539-GU
Amended Notice of Deposition Duces Tecum*

Respectfully submitted,

R. A. CUEVAS, JR.
MIAMI-DADE COUNTY ATTORNEY

By: 

David Stephen Hope
Assistant County Attorney
Florida Bar No. 87718
Miami-Dade County Attorney's Office
111 NW 1st Street, Suite 2810
Miami, FL 33128
Tel: (305) 375-5151
Fax: (305) 375-5634
E-mail: DHope@miamidade.gov

CERTIFICATE OF SERVICE

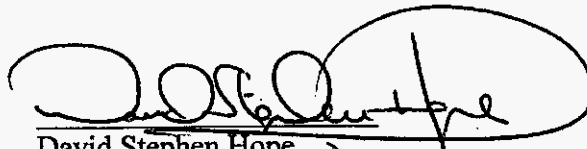
I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this

23rd day of March 2011 to:

Anna Williams, Esq.
Martha Brown, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Anwillia@PSC.State.FL.US
MBrown@PSC.State.FL.US

Floyd R. Self, Esq.
Messer, Caparello & Self, P.A.
2618 Centennial Place
Tallahassee, Florida 32308
fself@lawfla.com

Shannon O. Pierce, Esq.
AGL Resources, Inc.
Ten Peachtree Place, 15th Floor
Atlanta, Georgia 30309
Pierce@aglresources.com



David Stephen Hope
Assistant County Attorney

*In re: Petition for approval of Special Gas Transportation Agreement
Docket No. 090539-GU
Amended Notice of Deposition Duces Tecum*

SCHEDULE A

1. Any documents that FCG did not provide in response to discovery requests, including without limitation, responsive documents to Miami-Dade's Request to Produce No. 20 regarding continuing property records relating to the incremental pipe that serves Miami-Dade and any other documents that such as invoices, work orders, purchase orders, job tickets that provide proof of FCG's investment in the incremental pipe.
2. Any documents that show that Miami-Dade County was included as a GS-1250K customer in the 2003 rate case.
3. Any documents that identify FCG's incremental cost of operating and maintaining the facilities used to serve Miami-Dade and provide customer service and billing activities to Miami-Dade.
4. Copies of your pre-filed testimony and exhibits, discovery responses to requests by PSC Staff and Miami-Dade attributed to you or which you have prepared, and all the work papers and other materials used by you in the preparation of any testimony or discovery responses in this docket.