



Writer's E-Mail Address: bkeating@gunster.com

July 24, 2014

BY E-PORTAL FILING

Ms. Carlotta Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 140025-EI -Application for rate increase by Florida Public Utilities Company.

Dear Ms. Stauffer:

Attached for electronic filing on behalf of Florida Public Utilities Company/Electric Division (FPU) in the above-referenced docket, please find a Notice of Telephonic Deposition Duces Tecum.

Please do not hesitate to contact me if you have any questions whatsoever regarding this filing.

Sincerely,

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

Cc:/Service List (Docket 140025-EI)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for Rate Increase by Florida
Public Utilities Company.

DOCKET NO. 140025-EI

DATED: July 24, 2014

NOTICE OF TELEPHONIC DEPOSITION DUCES TECUM

To: Office of Public Counsel
Patricia Christensen, Esquire
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400

NOTICE IS HEREBY GIVEN that Florida Public Utilities Company, pursuant to Florida Rule of Civil Procedure 1.310, will take the telephonic depositions of the following named individuals at the date, locations, and times indicated below:

<u>Witness</u>	<u>Location/Number</u>
J. Randall Woolridge 120 Haymaker Circle, State College, PA 16801 Thursday, July 31, 2014 10:00 a.m. (EST)	Offices of Gunster Law Firm Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601 Tallahassee, FL 32301 Teleconference: 1-800-661-7007
Donna Ramas 4654 Driftwood Drive Commerce Township, Michigan 48382 Thursday, July 31, 2014 2:30 p.m. (EST), or immediately upon conclusion of the deposition of Randall Woolridge, whichever occurs later.	Passcode: 5211706#

Each witness should bring copies of all the work papers or other materials used by the witness in the preparation of any testimony filed in this docket. **Since the deposition will be taken by telephone, please have a Notary Public available to swear in the witness.** This 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.

Individuals with disabilities needing a reasonable accommodation to participate in this proceeding should contact undersigned counsel at (850) 521-1706. If hearing impaired, please call 1-800-955-8771 (TDD) or 1-800-955-8770 (V) via Florida Relay Service for assistance.

The deponents shall bring copies of documents as set forth below to this deposition and shall provide a copy of same to undersigned counsel for Florida Public Utilities Company in advance of the deposition.

DEFINITIONS

1. "Document" shall mean and refer to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software. As used herein, "Document" or "document" shall be given its broadest sense and shall mean all written or printed papers or other materials that contain or convey information, including, without limitation, all letters, reports, memoranda, laboratory data, records of telephone or other conversations, intra-office and interoffice communications, correspondence, electronic correspondence (e-mail), handwritten or typewritten notes, diaries, records of every kind, sound recordings, transcripts, contracts, agreements, books, financial statements, books of account, journals, ledgers, invoices,

indices, data processing cards, other data processing materials, data sheets, computer modeling input and output files, tapes, photographs, photostats, aerial maps, bulletins, circulars, notices, messages, tabulations, economic or statistical studies, instructions, requests, calendars, desk pads, appointment books, scrapbooks, notebooks, specifications, drawings, diagrams, sketches, and writings of every kind or character, including preliminary drafts and other copies of the foregoing, however produced or reproduced. "Document" also includes information stored by a computer, whether stored on a hard disk, "floppy" disk, CD ROM, or in any other fashion or manner.

2. "FPSC" shall mean the Florida Public Service Commission.
3. "Related to" shall mean contain, discussed, described, addressed, referred to, or relied upon.
4. "Testimony" shall mean pre-filed testimony by the witness filed on behalf of and at the direction of the Office of Public Counsel in Docket No. 140025-EI.

INSTRUCTIONS

5. Scope of Deposition Duces Tecum. In appearing for this Deposition Duces Tecum, produce all responsive documents, including any and all non-identical copies of each such document.
6. Privilege. If any Document is withheld on the basis of privilege or other similar such basis, as applicable, the following information regarding the withheld document:
 - a. Describe the type of document and general topic or subject matter;
 - b. Identify the author and addressee;
 - c. Identify the date the document was created;
 - d. State the specific basis of the privilege upon which the document has been

withheld.

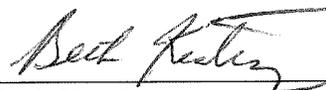
7. If any document responsive to any Request herein is no longer in your possession or control:
 - a. Identify the document;
 - b. Describe the nature of the disposition of the document; and
 - c. As applicable, identify the location of the document and in whose possession the document resides.
8. Documents requested herein include those in your possession and control, as well as the possession and control of your employees, agents, representatives, and attorneys.

DOCUMENTS REQUESTED

1. All documents or work papers related to, relied upon, or referred to in preparation of your pre-filed testimony in FPSC Docket No. 140025-EI.

Please govern yourselves accordingly.

Respectfully submitted,



Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706
*Attorneys for Florida Public Utilities
Company*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 24th day of July, 2014:

Patricia A. Christensen, Esquire
Office of the Public Counsel
c/o The Florida Legislature
111 West Madison St., Rm 812
Tallahassee, FL 32399-1400

Martha Barrera, Esquire/Suzanne Brownless,
Esquire
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

By: 
Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706