BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re:	Environmental cost recovery clause.)	Docket No. 150007-EI
)	
)	Filed: October 14, 2015

DUKE ENERGY FLORIDA, LLC'S NOTICE OF AREAS OF WITNESS EXPERTISE

Duke Energy Florida, LLC ("DEF") submits this Notice of Areas of Witness Expertise, and states:

- 1. DEF has pre-filed the testimony of Thomas G. Foster, Michael Delowery, Garry Miller, Jeffrey Swartz, Patricia Q. West, and Corey Zeigler. The witnesses' qualifications are fully described in their respective testimonies, but due to the objection to expert testimony contained in the Florida Industrial Power Users Group's prehearing statement (filed October 9, 2015), DEF provides this additional clarification regarding the qualifications and scope of expert testimony filed in this docket.
- 2. Thomas G. Foster is a fact witness when providing factual information and also qualified as an expert witness through his knowledge, skill, experience, training and education, to the extent he offers opinions on the subject matter of Issue Nos. 1-8, 10A, 10B, and 13, namely: the operation, calculations and policy considerations associated with the Commission's environmental cost recovery clause ("ECRC"); the accounting for and calculation of environmental cost recovery amounts and factors; issues surrounding the appropriateness of recovering prudently incurred costs associated with DEF's Coal Combustion Residual Rule Program through the ECRC; issues surrounding the effective date of ECRC factors for billing purposes; and the tariff approval process.

- 3. Michael Delowery is a fact witness when providing factual information and also qualified as an expert witness through his knowledge, skill, experience, training and education, to the extent he offers opinions on the subject matter of Issue Nos. 1-3, namely: the calculation of environmental cost recovery amounts and projections.
- 4. Garry Miller is a fact witness when providing factual information and also qualified as an expert witness through his knowledge, skill, experience, training and education, to the extent he offers opinions on the subject matter of Issue Nos. 2-3 and 10A, namely: the calculation of environmental cost recovery amounts and projections; and issues surrounding the prudently incurred costs associated with DEF's Coal Combustion Residual Rule Program through the ECRC.
- 5. Jeffrey Swartz is a fact witness when providing factual information and also qualified as an expert witness through his knowledge, skill, experience, training and education, to the extent he offers opinions on the subject matter of Issue Nos. 1-3, namely: the calculation of environmental cost recovery amounts and projections.
- 6. Patricia Q. West is a fact witness when providing factual information and also qualified as an expert witness through her knowledge, skill, experience, training and education, to the extent she offers opinions on the subject matter of Issue Nos. 1-3, namely: the calculation of environmental cost recovery amounts and projections.
- 7. Corey Zeigler is a fact witness when providing factual information and also qualified as an expert witness through his knowledge, skill, experience, training and education, to the extent he offers opinions on the subject matter of Issue No. 1, namely: the calculation of environmental cost recovery amounts.

8. DEF proffers this notice as an affirmative statement of the subject matter of its witnesses' expertise for the purpose of this proceeding. Each witness is prepared to confirm the statements of expertise in this notice when she or he takes the stand.

Respectfully submitted,

s/Matthew R. Bernier

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 14th day of October, 2015.

<u>s/Matthew R. Bernier</u> Attorney

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