

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of:

DOCKET NO. 150001-EI

FUEL AND PURCHASED POWER COST
RECOVERY CLAUSE WITH
GENERATING PERFORMANCE
INCENTIVE FACTOR.

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PROCEEDINGS: PREHEARING CONFERENCE

COMMISSIONER
PARTICIPATING: CHAIRMAN ART GRAHAM
PREHEARING OFFICER

DATE: Monday, October 19, 2015

TIME: Commenced at 2:33 p.m.
Concluded at 3:23 p.m.

PLACE: Betty Easley Conference Center
Room 148
4075 Esplanade Way
Tallahassee, Florida

REPORTED BY: LINDA BOLES, CRR, RPR
Official FPSC Reporter
(850) 413-6734

1 APPEARANCES:

2 JAMES D. BEASLEY, J. JEFFRY WAHLEN, and ASHLEY
3 M. DANIELS, ESQUIRES, Ausley & McMullen, Post Office Box
4 391, Tallahassee, Florida 32302, appearing on behalf of
5 Tampa Electric Company.

6 JEFFREY A. STONE, RUSSELL A. BADDERS, and
7 STEVEN R. GRIFFIN, ESQUIRES, P.O. Box 12950, Pensacola,
8 Florida 32591-2950, appearing on behalf of Gulf Power
9 Company.

10 DIANNE M. TRIPLETT and JOHN T. BURNETT,
11 ESQUIRES, 299 First Avenue North, St. Petersburg,
12 Florida 33701; and MATTHEW R. BERNIER, ESQUIRE, 106 East
13 College Avenue, Suite 800, Tallahassee, Florida
14 32301-7740, appearing on behalf of Duke Energy Florida,
15 Inc.

16 JOHN T. BUTLER, R. WADE LITCHFIELD, MARIA J.
17 MONCADA and JESSICA CANO, ESQUIRES, 700 Universe
18 Boulevard, Juno Beach, Florida 33408-0420, appearing on
19 behalf of Florida Power & Light Company.

20 ROBERT SCHEFFEL WRIGHT and JOHN T. LaVIA, III,
21 ESQUIRES, Gardner Law Firm, 1300 Thomaswood Drive,
22 Tallahassee, Florida 32308, appearing on behalf of the
23 Florida Retail Federation.

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1 APPEARANCES (Continued):

2 BETH KEATING, ESQUIRE, Gunster Law Firm, 215
3 South Monroe Street, Suite 601, Tallahassee, Florida
4 32301-1839, appearing on behalf of Florida Public
5 Utilities Company.

6 JON C. MOYLE, JR., and KAREN PUTNAL, ESQUIRES,
7 Moyle Law Firm, P.A., 118 North Gadsden Street,
8 Tallahassee, Florida 32301, appearing on behalf of
9 Florida Industrial Power Users Group.

10 J.R. KELLY, PUBLIC COUNSEL; CHARLES REHWINKEL,
11 DEPUTY PUBLIC COUNSEL; ERIK L. SAYLER, PATRICIA
12 CHRISTENSEN, and JOHN J. TRUITT, ASSOCIATE PUBLIC
13 COUNSEL, ESQUIRES, Office of Public Counsel, c/o the
14 Florida Legislature, 111 W. Madison Street, Room 812,
15 Tallahassee, Florida 32399-1400, appearing on behalf of
16 the Citizens of the State of Florida.

17 JAMES W. BREW, OWEN J. KOPON and LAURA A.
18 WYNN, ESQUIRES, Xenopoulos & Brew, P.C., 1025 Thomas
19 Jefferson Street, NW, Eight Floor, West Tower,
20 Washington, DC 20007, appearing on behalf of White
21 Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate
22 - White Springs.

1 APPEARANCES (Continued):

2 SUZANNE BROWNLESS, DANIJELA JANJIC, and JOHN
3 VILLAFRATE, ESQUIRES, Florida Public Service Commission,
4 2540 Shumard Oak Boulevard, Tallahassee, Florida
5 32399-0850, appearing on behalf of the Florida Public
6 Service Commission.

7 MARY ANNE HELTON, ESQUIRE, Advisor to the
8 Commission, 2540 Shumard Oak Boulevard, Tallahassee,
9 Florida 32399-0850, appearing as advisor to the Florida
10 Public Service Commission.

11 CHARLIE BECK, General Counsel, Florida Public
12 Service Commission, 2540 Shumard Oak Boulevard,
13 Tallahassee Florida, appearing as General Counsel to the
14 Florida Public Service Commission.

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P R O C E E D I N G S

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2 **CHAIRMAN GRAHAM:** Okay. I figure the sooner
3 we get started, the sooner we can get done.

4 We will call this prehearing to order. Let
5 the record show it is Monday at 2:00, and this is the
6 fuel clause prehearing.

7 Staff, if -- excuse me. Staff, if I can get
8 you to read the notice, please.

9 **MS. MAPP:** By notice issued October 5th, 2015,
10 this time and place is set for a Prehearing Conference
11 in the following dockets: 150001-EI, 150002-EG,
12 150003-GU, 150004-GU, and 150007-EI. The purpose of the
13 prehearing is set out in the notice.

14 **CHAIRMAN GRAHAM:** Okay. I think we need to
15 take appearances.

16 **MR. BUTLER:** Good afternoon, Mr. Chairman.
17 John Butler appearing on behalf of Florida Power & Light
18 Company in the 01, 02, and 07 dockets. I'd also like to
19 enter an appearance for Wade Litchfield and Maria
20 Moncada in those three dockets, and for Jessica Cano in
21 the 01 docket only. Thank you.

22 **MR. BERNIER:** Good afternoon, Mr. Chairman.
23 Matt Bernier for Duke Energy Florida, and making an
24 appearance in the 01, 02, and 07 dockets. I'd also like
25 to enter an appearance for Dianne Triplett in those same

1 dockets and John Burnett in the 01 docket only. Thank
2 you.

3 **MR. BEASLEY:** Good afternoon, Chairman Graham.
4 James D. Beasley appearing with J. Jeffry Wahlen, Ashley
5 M. Daniels in the 01, 02, and 07 dockets for Tampa
6 Electric.

7 **MR. BADDERS:** Good afternoon, Chairman.
8 Russell Badders on behalf of Gulf Power Company in the
9 01, 02, and 07 dockets. I'd also like to enter an
10 appearance for Jeffrey A. Stone and Steven R. Griffin in
11 the same dockets.

12 **MS. KEATING:** Good afternoon, Mr. Chairman.
13 Beth Keating with the Gunster Law Firm here this
14 afternoon for FPUC in the 01 and 02 dockets. Also here
15 for FPUC in the 03 dockets, as well as Florida City Gas.
16 And in the 04 docket appearing for FPUC, FPUC Fort
17 Meade, FPUC Indiantown Division, Chesapeake, and Florida
18 City Gas.

19 **MS. PUTNAL:** Good afternoon, Chairman Graham.
20 I'm Karen Putnal. I'm here today on behalf of the
21 Florida Industrial Power Users Group. I'd like to make
22 an appearance in the 01, 02, and 07 dockets, and also
23 enter an appearance for Jon Moyle in those same dockets.
24 Thank you.

25 **MR. LAVIA:** Good afternoon, Mr. Chairman.

1 J. LaVia with the Gardner Law Firm making an appearance
2 in the 01 docket on behalf of the Florida Retail
3 Federation. I'd also like to make an appearance for my
4 law partner Robert Scheffel Wright in the same
5 01 docket. Thank you.

6 **MR. KOPON:** Good afternoon, Mr. Chairman.
7 Owen Kopon for PCS Phosphate/White Springs in the 01,
8 02, and 07 dockets. And I'd also like to make an
9 appearance for James Brew and Laura Wynn.

10 **MR. REHWINKEL:** Good afternoon, Mr. Chairman.
11 Let me try to do this. Charles J. Rehwinkel with the
12 Office of Public Counsel making an appearance in all
13 dockets, along with J. R. Kelly in all dockets.

14 In the 02 docket that would -- the appearance
15 would be additionally with Patricia Christensen. In the
16 03 docket, Patricia Christensen also. In the 04 docket,
17 I am the only one making an appearance in addition to
18 Mr. Kelly. And in the 07 docket, Patricia Christensen
19 also.

20 Let me go back to the 01 docket. The
21 appearances will also be Patricia Christensen, John
22 Truitt, and Erik Sayler in addition to myself and
23 Mr. Kelly. Thank you.

24 **CHAIRMAN GRAHAM:** Okay.

25 **MR. HORTON:** Mr. Chairman, Norman H. Horton,

1 Jr., appearing in the 04 docket for Sebring Gas.

2 **CHAIRMAN GRAHAM:** That's the 04 docket?

3 **MR. HORTON:** Yes, sir. The 04 docket.

4 **CHAIRMAN GRAHAM:** Okay.

5 **MS. MAPP:** Kyesha Mapp appearing in the
6 03 docket, Suzanne Brownless -- and making an appearance
7 for Suzanne Brownless, Danijela Janjic, and John
8 Villafrate in the 01 docket; Lee Eng Tan and Bianca
9 Lherisson in the 02 docket; Leslie Ames and Kelley
10 Corbari in the 04 docket; and Charles Murphy in the 07
11 docket.

12 **CHAIRMAN GRAHAM:** Okay. Was that --

13 **MS. HELTON:** Mary Anne Helton. I'm here as an
14 advisor for you in all of the dockets.

15 **MR. BECK:** And Charlie Beck, General Counsel.

16 **CHAIRMAN GRAHAM:** Is that all the appearances?

17 Okay. So the order of the dockets today are
18 going to be the 03 docket, then the 04 docket, then the
19 02 docket, then the 07 docket, and then the 01 docket.

20 * * * * *

21 **CHAIRMAN GRAHAM:** We'll proceed to the
22 shortest docket, 01. Okay. Docket 01, staff,
23 preliminary matters.

24 **MS. BROWNLESS:** We have no preliminary matters
25 at this time.

1 **CHAIRMAN GRAHAM:** Does anybody else have any
2 preliminary matters for this docket? Ms. Christensen.

3 **MS. CHRISTENSEN:** I'm not sure whether or not
4 this is a preliminary matter. I just wanted to note for
5 the record Office of Public Counsel filed a motion today
6 and a notice that we were amending our prehearing
7 statements and a motion to strike. We're not
8 anticipating that that will be ruled on today since the
9 parties have seven days to respond. It's an evidentiary
10 motion, so I would assume that it would be taken up
11 after the voir dire of the witness or the questioning of
12 the witnesses as to the qualifications at the hearing,
13 but wanted to make the parties aware that that was
14 filed. And I have additional copies of the motion if
15 anybody would like a copy today.

16 **CHAIRMAN GRAHAM:** Well, they're definitely not
17 going to be ruled on today. But, staff, is that
18 correct?

19 **MS. BROWNLESS:** With regard to the motion, we
20 were going to take that up, Patty, when we got to the
21 expert witness part, but it's fine to talk about it now.

22 Everybody has just received this today.
23 There's two parts to the motion. One part is to allow
24 Office of Public Counsel to amend their prehearing
25 statement to object to the expertise of Mr. Reed based

1 upon the fact that Mr. Reed's rebuttal testimony was
2 filed on the same day that the prehearing statements
3 were due. That strikes the staff as being perfectly
4 reasonable.

5 Having -- so we would recommend that the bench
6 allow Public Counsel to amend their prehearing
7 statement. If, in fact, the bench does do that, then,
8 of course, everyone else, every other party to the
9 docket has the ability to also amend their prehearing
10 statement with regard to the expertise of rebuttal
11 witnesses. So that's the first point I would like to
12 make.

13 The second point is kind of a technical one,
14 but -- and this is a question for Public Counsel. Does
15 the Public Counsel intend for this written motion to act
16 as a waiver of its right to voir dire Mr. Reed at trial?

17 **MS. CHRISTENSEN:** I would suggest -- and the
18 answer, short answer is no, but I would -- the
19 Prehearing Order requires that we file all motions to
20 strike by the Prehearing Conference, so we complied with
21 that.

22 Our thought was that all the parties -- and I
23 believe FIPUG still has an outstanding objection, as
24 well as FRF, to the qualifications of expert witnesses,
25 and they may be taking specific positions on certain

1 witnesses in this docket as well. But I would expect
2 that voir dire or the questioning of the witnesses'
3 qualifications would take place first, and then we could
4 renew our motion to strike the testimony based on what
5 comes out, assuming that there's no changes. Since this
6 is prefiled testimony, I would assume he'd testify
7 consistent with his prefiled testimony. But as with
8 everything, live testimony, a live witness, you know, we
9 would reserve our right to make the necessary
10 adjustments to our motion to strike for anything that
11 would be -- come out during the voir dire, the
12 questioning.

13 **MS. BROWNLESS:** Just so we're all clear on the
14 procedure then, we would put the witness on the stand.
15 If folks wished to voir dire, they would voir dire, and
16 then you would make your objection to the expertise, and
17 then there would be a ruling on -- an opportunity for
18 FP&L to respond to the objection, and then a ruling on
19 the objection. And then at that time, depending upon
20 what happens with the ruling, you would indicate to the
21 agency what portions of the testimony you deem should be
22 stricken. Is that kind of what you have in mind?

23 **MS. CHRISTENSEN:** Yes. That would be -- I
24 think that would be the appropriate way to do it. A
25 motion to strike is generally done at the time when the

1 person is called to testify and --

2 **MS. BROWNLESS:** And if other folks also wanted
3 to voir dire the witness, and I'd like to ask at this
4 time are there any other parties that will seek to, if
5 you know, that will seek to voir dire Mr. Reed?

6 **MS. PUTNAL:** Yes. FIPUG has identified five,
7 potentially six witnesses that FIPUG would like to have
8 the opportunity to voir dire, and Mr. Reed is among
9 those.

10 **MS. BROWNLESS:** Okay.

11 **MS. PUTNAL:** If I may just state, I'm hearing
12 this conversation -- of course, you know, it's being
13 discussed for the first time since the motion was filed
14 this morning by OPC.

15 **CHAIRMAN GRAHAM:** Can I get you to pull your
16 microphone down a little bit?

17 **MS. PUTNAL:** Yes.

18 **CHAIRMAN GRAHAM:** Thank you.

19 **MS. PUTNAL:** Thank you. I would just like to
20 state on the record that FIPUG has not waived its
21 entitlement to conduct voir dire or to move to strike
22 testimony based on the results of the voir dire. It may
23 be that as a result of voir dire, hearing the witness's
24 responses and counsel's responses to any questions that
25 are posed to the witness, that FIPUG would not move to

1 strike. But certainly at this point, not having had an
2 opportunity to present the questions or hear the
3 responses or arguments of counsel or comments from the
4 Commission, we, you know, we've not filed a motion to
5 strike at this time, and I don't believe we have waived
6 any right to do so at the hearing.

7 **MS. BROWNLESS:** Okay. Okay. I think
8 everybody -- does everybody understand the procedure
9 we're going to use and is everyone comfortable with it?

10 **MR. LAVIA:** This is J. LaVia for the Retail
11 Federation. So to be clear, parties will have an
12 opportunity to voir dire during live testimony, and no
13 rights are being waived today; correct?

14 **MS. BROWNLESS:** Correct.

15 **MR. LAVIA:** That's fine with the Retail
16 Federation.

17 **MS. BROWNLESS:** And I -- well, I want to make
18 sure to be clear about that. Because the areas of
19 expertise were filed for all witnesses on October 14th
20 by everybody, by everyone presenting a witness, we would
21 expect that parties would be able by 5:00 tomorrow to
22 identify with specificity the witnesses that they had
23 questions about that they wish to voir dire. And I
24 would also urge you to identify the portions of the
25 testimony that should your -- should you make an

1 objection to the expertise, that you identify with
2 specificity the areas of the testimony and exhibits that
3 you would seek to have stricken. Particularly with
4 regard to the hedging witnesses, their testimony
5 includes both factual data as well as opinion testimony,
6 and so we would hope that by 5:00 tomorrow you could
7 identify the witness and identify the specific portions
8 of the testimony and exhibits that you would wish to
9 have stricken, should your objection be granted.

10 **MR. LAVIA:** Thank you.

11 **MS. PUTNAL:** Mr. Chairman, just to follow up
12 on that request, we will certainly work with the parties
13 and with staff, and we will be able to identify the
14 witnesses for whom we would like to conduct voir dire by
15 5:00 tomorrow.

16 With respect to the specific sections of the
17 testimony, that may take a little more time, a little
18 more work. In fact, it may require questioning the
19 witnesses themselves in terms of identifying the
20 portions of the testimony that are based on the
21 witness's claim of expertise in a particular area. So
22 I -- we will certainly work with you to identify all
23 those areas that we can, but I'm not sure at this point
24 because the testimony sort of blends, as you say,
25 between fact and opinion and because -- this is an

1 evolving process that maybe that in the future when
2 prefiled testimony is submitted, that each section of
3 testimony is tied perhaps to an area of expertise that
4 the witness is asserting or the party is asserting the
5 witness has, which would make this process much easier
6 in terms of identifying that testimony as it relates to
7 a specific area of expertise.

8 So long story short, we will certainly work
9 with you to provide as much information about the areas
10 of testimony as we can, and we'll certainly be able to
11 provide the names of the witnesses at issue.

12 **MS. BROWNLESS:** Well, we would certainly urge
13 you to do as much identification of the areas over which
14 you feel expert testimony is being offered as possible,
15 and we appreciate your help.

16 **CHAIRMAN GRAHAM:** Let's take about five
17 minutes. I need to check on something. And according
18 to that clock back there, that would be about 12 minutes
19 till.

20 (Recess taken.)

21 **MS. BROWNLESS:** Commissioner, if I may just
22 clarify.

23 **CHAIRMAN GRAHAM:** Hold on.

24 **MS. BROWNLESS:** Yes, sir.

25 **CHAIRMAN GRAHAM:** You know, I like blowing in

1 the mike so much better than banging the gavel.

2 Okay, staff.

3 **MS. BROWNLESS:** Okay. If I might just clarify
4 what we're seeking by 5:00 tomorrow. We're seeking
5 identification of each and every witness that you wish
6 to voir dire. And we're also seeking only this broad
7 distinction: For each witness, what is the part of
8 their testimony that you deem to be factual and,
9 therefore, not subject to a challenge of expertise, and
10 what part of their testimony do you deem to be, you
11 know, expert testimony subject to voir dire? So to the
12 extent that you do not do that by 5:00 p.m. tomorrow,
13 then we would assume that you have waived your right to
14 conduct voir dire about the witnesses. So with that
15 clarification, that's what we would tender, Your Honor.

16 **CHAIRMAN GRAHAM:** You have me a little
17 confused.

18 **MS. BROWNLESS:** Okay.

19 **CHAIRMAN GRAHAM:** All right. So you want for
20 them to come back to you with the actual witness that
21 they are questioning their expertise.

22 **MS. BROWNLESS:** Right.

23 **CHAIRMAN GRAHAM:** And you want for them to
24 come back with the part of their testimony that they
25 question or the part of the --

1 **MS. BROWNLESS:** That they believe is expert
2 testimony subject to their challenge. Because many of
3 these witnesses have testimony --

4 **CHAIRMAN GRAHAM:** Slow down. Slow down. Slow
5 down. Slow down. I'm an engineer and everything is
6 going to be bullet points and lines.

7 **MS. BROWNLESS:** Okay.

8 **CHAIRMAN GRAHAM:** Okay. So we're going to
9 identify the witness.

10 **MS. BROWNLESS:** Their name.

11 **CHAIRMAN GRAHAM:** And then we're going to
12 identify the part of the testimony that they agree with
13 or the part of the testimony they don't agree with?

14 **MS. BROWNLESS:** No. The part of their
15 testimony that they deem --

16 **CHAIRMAN GRAHAM:** That they're challenging.

17 **MS. BROWNLESS:** -- to be factual and,
18 therefore, not challenged, and the part of their
19 testimony that they believe is subject to challenge
20 because it is expert testimony.

21 And the reason that's important is because for
22 many of the witnesses here their -- and the hedging
23 witnesses are a perfect example. There's part of their
24 testimony that deals with 2014 hedging results, which
25 are facts, and then there's part of their testimony

1 which deals with 2015 projections for the rest of the
2 year and 2016 projections, and all of that could be and
3 is subject to an expert challenge because it takes
4 expertise to make those projections.

5 So we're just trying to get a general idea.
6 And I think that that's something that the parties could
7 identify prior to hearing from the questions and answers
8 from the individual experts.

9 **CHAIRMAN GRAHAM:** Retail Federation.

10 **MR. LAVIA:** Thank you. Just so I understand,
11 this is adding a layer that I've never heard of before
12 where the challenging party has to identify what is
13 fact, what is not fact, and what is mixed questions of
14 fact and law. Typically those decisions are made by
15 the, by the Chair, by the judge, whoever the case, the
16 ALJ, and sometimes they're close calls and sometimes --
17 and often in this type of proceeding they're mixed. So
18 we don't get to conduct voir dire with regard to factual
19 testimony. Their qualifications to give factual
20 testimony, not at issue. It's to give expert opinion
21 testimony. And that's where I'm a little unclear on how
22 we're going to do that. And it is putting a burden on
23 us that I have never seen put on a challenging party
24 before, so I think I would object to that.

25 **CHAIRMAN GRAHAM:** Anybody else?

1 **MS. CHRISTENSEN:** Patty Christensen with the
2 Office of Public Counsel. Since we've filed a written
3 motion that explicitly outlines what part of the
4 prefiled testimony we object to -- in sum, the whole
5 prefiled testimony of that particular witness -- I'm
6 assuming this procedure is not applicable to our motion
7 and our objection to this particular witness since we've
8 already done it essentially.

9 **MS. BROWNLESS:** Right. You've done it.

10 **MS. CHRISTENSEN:** And I'll let the other
11 parties, FIPUG and Retail, speak to their concerns.

12 **CHAIRMAN GRAHAM:** FIPUG.

13 **MS. PUTNAL:** We would join the objection of
14 the Retail Federation. I understand the objective and
15 the goal, but I do believe that there are probably many
16 instances in the prefiled testimony where the testimony
17 is a combination or a blend of fact and opinion, which
18 adds a layer of difficulty in addition to the original
19 issue, which is whether all of the opinions are at
20 issue. I mean, a witness may have several bases for his
21 or her expertise, some of which may not be in dispute at
22 all. There may be areas of expertise that are in
23 dispute that go beyond those that are agreed upon. So
24 we would object to the extent -- not to the request, but
25 to the extent that the inability to separate out those

1 issues by tomorrow at 5:00 would be construed as a
2 waiver.

3 **CHAIRMAN GRAHAM:** Ms. Brownless, let's try
4 this. Let's identify the witnesses, let's identify the
5 area of expertise that is in question. And if they can
6 go further past that, then the more detail you can get
7 into, that's fine, but at least by 5:00 tomorrow they
8 identify the witnesses and the area of expertise that
9 they are questioning or challenging.

10 **MS. BROWNLESS:** And I think I want -- we need
11 to be clear that if you do not identify a witness by
12 5:00 tomorrow, that you will have waived the right to
13 voir dire them.

14 **MS. PUTNAL:** Mr. Chairman, Ms. Brownless, I
15 under -- I think that in this situation, FIPUG commits
16 to identifying the witnesses in this proceeding by 5:00
17 tomorrow. I think what makes me a little bit anxious is
18 whether FIPUG is agreeing, you know, to that procedure
19 going forward. As I said, I think that this is an
20 evolving procedure. We're all kind of feeling our way
21 through this, and we'd like to have an opportunity to,
22 you know, work on that evolution. There may be things
23 that could have been done earlier in the process that
24 would make this step easier. So for tomorrow, we
25 completely agree we'll do our best to do that by 5:00.

1 We understand we need to identify the witnesses in this
2 docket, but I didn't want to, like, overextend that
3 agreement to future proceedings.

4 **CHAIRMAN GRAHAM:** Well, I can't swear that
5 I'll be Prehearing Officer next year, but as far as
6 tomorrow goes, you're good.

7 **MS. PUTNAL:** Thank you.

8 **MS. BROWNLESS:** So if they don't identify a
9 witness by 5:00 tomorrow, are they going to be allowed
10 to voir dire different witnesses that they have not
11 identified at the hearing?

12 **CHAIRMAN GRAHAM:** In this specific case they
13 will not be able to voir dire that person if they do not
14 identify them by 5:00 tomorrow.

15 **MS. BROWNLESS:** Thank you, Your Honor.

16 **CHAIRMAN GRAHAM:** That doesn't mean moving
17 forward that that's going to be the new standard.

18 **MR. LAVIA:** Just to be clear in terms of
19 process, just sending emails with whom we identify, or
20 do we have to file a specific pleading? How do you
21 anticipate handling this?

22 **MS. BROWNLESS:** It probably would be better if
23 you file a notice similar to what the utilities filed
24 identifying the expertise of their witnesses.

25 **MR. LAVIA:** So if I file a notice challenging

1 all -- or questioning the expertise of all witnesses,
2 that would cover it?

3 **MS. BROWNLESS:** Sure.

4 **MR. LAVIA:** Okay.

5 **CHAIRMAN GRAHAM:** Mr. Rehwinkel.

6 **MR. REHWINKEL:** Yes, Mr. Chairman, two
7 observations. Actually one question. This docket has
8 sort of -- has an ominous portent to it with respect to
9 voir dire, so I would ask if it's possible that we could
10 get some agreement on the timing on when the voir dire
11 would occur. Normally the witness sits where I am right
12 now and gives -- goes through the Q and A with the --
13 that party's attorney and then gives a summary --
14 actually -- and is then tendered for cross-examination.
15 It seems it might be appropriate -- well, I don't know
16 when the appropriate time for the voir dire would be,
17 but certainly anything the witness would testify to that
18 would go into evidence ought to be subject to voir dire
19 before that occurs.

20 **MS. BROWNLESS:** And I do -- I have given that
21 some thought, Mr. Rehwinkel.

22 **MR. REHWINKEL:** Okay.

23 **MS. BROWNLESS:** And this is the method I would
24 propose. And this is based on research I did in
25 Padovano's -- what do they call it -- Florida Civil

1 Practice, 2011 Edition.

2 You ask if the witness has been sworn. They
3 state their name and address. By whom are you employed,
4 in what capacity? Have you prefiled testimony? Is this
5 a true and correct copy of your prefiled testimony? Do
6 you have any changes or revisions to your testimony? If
7 I asked you the same questions today, would your answers
8 be the same? Then say, Mr. and Ms. so and so, notice
9 was filed on October 14th that you will testify as an
10 expert with respect to area A, B, C, D, E, F, G,
11 whatever it is. Is it your intent to testify in those
12 areas at this time? And then the witness will answer
13 the question. And then you would tender the witness for
14 voir dire, and that -- we'll just go down the line and
15 let everybody ask the questions. And then we would --
16 you would either object -- you know, you'd make your
17 objections, allow the utility or the person who's
18 sponsoring the witnesses to respond to those objections,
19 get a ruling on the objection, and then at that time it
20 would seem to me that you would have to say the part of
21 his testimony or her testimony that you believe should
22 be stricken as a result of the ruling if an area of
23 expertise is -- you know, if they're found not to be an
24 expert in an area of expertise, that you would have to
25 be prepared at that time to state what you thought

1 was -- should be stricken so that the Chair could rule
2 on that.

3 And then you would pick back up after the
4 ruling and say -- talk about exhibits, identify the
5 exhibits, they've been premarked for identification,
6 give the summary, tender the witness for cross. And I
7 want to -- and this is for my benefit because I have not
8 done this docket before. Usually in the past what we've
9 done is not made objections to identified exhibits at
10 the time the exhibit was identified. Usually we have
11 waited until the end of the proceeding to do that. So
12 is that what everybody understands will be done?

13 **MR. BUTLER:** End of proceeding or end of that
14 witness's testimony?

15 **MS. BROWNLESS:** End of that witness's,
16 that's -- I mean, when you -- when everybody gets
17 through. Is that acceptable?

18 **CHAIRMAN GRAHAM:** So let me see if I
19 understand. So when is the witness's direct testimony
20 entered into the record? It's after he's been
21 challenged and after --

22 **MS. BROWNLESS:** After he's been challenged and
23 there's been a ruling on the challenge.

24 **CHAIRMAN GRAHAM:** After I've challenged --
25 after I've ruled on the challenge?

1 **MS. BROWNLESS:** Yes.

2 **CHAIRMAN GRAHAM:** And say I agree with the
3 challenge, then the challenger will have to go through
4 and state specifically where in the record it's been --
5 they want to get stricken?

6 **MS. BROWNLESS:** Yes, sir.

7 **CHAIRMAN GRAHAM:** And then that part of the
8 direct testimony would be entered into the record.

9 **MS. BROWNLESS:** Yes, sir. And then we'd move
10 on. And then when you got your exhibits identified,
11 then they do the summary, tender for cross, get to the
12 end of his testimony, when everybody has had an
13 opportunity to cross-examine, move the exhibits into the
14 record, and then any objection to the exhibits, the
15 admissibility of the exhibits could be made at that
16 time. Does that all sound good for everybody?

17 **CHAIRMAN GRAHAM:** Mr. Rehwinkel, you have the
18 floor.

19 **MR. REHWINKEL:** I mean, I would defer to
20 Ms. Christensen, but I think that's the kind of
21 clarification I was looking for as far as the timing. I
22 think that's the best way to protect the interests of
23 everyone is to do this before it goes into the record.

24 **MS. CHRISTENSEN:** And I would concur with my
25 colleague. I would just ask, since Ms. Brownless has an

1 idea of how that would go in the flow of questioning, if
2 maybe she could just do a brief summary of those
3 questions and send it to the parties so that we're all
4 clear on how that would go in. I mean, if it's not too
5 much trouble.

6 **MS. BROWNLESS:** Oh, sure.

7 **MS. CHRISTENSEN:** You know, I think it'll make
8 it smoother as we get there. And then, of course, when
9 we move exhibits into the record, we would -- those
10 would be subject to the motion to strike as well.

11 **MS. BROWNLESS:** Right.

12 **MS. CHRISTENSEN:** And with those
13 clarifications, I think we're clear on how the process
14 should proceed.

15 **MR. REHWINKEL:** Mr. Chairman, the observation
16 I was going to make, your General Counsel has
17 established an ongoing process to look at process and
18 procedure at the Commission. It's been very helpful for
19 the parties to have a dialogue. I think the Public
20 Counsel shares the concerns that Retail Federation and
21 FIPUG express, and we would urge that this process -- I
22 think we're working through it here and I think you've
23 got a workable process that you are devising as
24 Prehearing Officer, but we would urge that -- and I
25 think this is scheduled for later this month, and I

1 would urge that this be given some priority and we
2 discuss it, and we can kind of collaboratively work
3 through a process that works for everyone with the kind
4 of input that's given, more measured and thoughtful
5 input by everyone rather than do it on the fly. And I'm
6 not contesting the process your staff has developed. I
7 think what Ms. Brownless has suggested is workable and
8 we'll work through it. But I would urge that before we
9 make this anything more permanent, that we go through
10 this iterative process that your General Counsel has
11 established.

12 **CHAIRMAN GRAHAM:** Well, just like I told
13 Ms. Putnal, as I told Ms. Putnal earlier, as you said,
14 this is going to be something we're kind of sticking our
15 toes in the water now inching our way through. So just
16 because we're doing it this way doesn't mean that it's
17 now in granite because I think -- because everybody is
18 being patient as we go through this. There may be some
19 things next year that should be changed from this year.
20 Of course, I wouldn't wait until this time next year to
21 suggest those changes. But I don't think, like I said,
22 I don't think anything is going to be written in stone.
23 As you guys get together maybe 30 days from now is the
24 time to talk about how this could have been done better.

25 **MS. BROWNLESS:** And a final point with regard

1 to this, because this is a motion to strike, the parties
2 do have seven days to file a written response. We're on
3 a very short timeline here, so to the extent that anyone
4 wishes to file a written response either in support of
5 the motion or in opposition to the motion, we would --
6 I'm putting forth the idea that would it be possible to
7 do that by this Friday? If you want to file a written
8 response. You don't have to file a written response.
9 You certainly are able to argue that at the voir dire.

10 **MR. BUTLER:** Presently we do expect to file a
11 written response. If I have followed this, it doesn't
12 seem like there's going to be a ruling --

13 **MS. BROWNLESS:** No.

14 **MR. BUTLER:** -- on that motion before the
15 hearing anyway, so I guess I'm not sure what the impetus
16 is for cutting time off of our response? I mean, I
17 would prefer that we be given the regular seven days to
18 respond. If we were setting it up for something that
19 was going to be ruled upon before the hearing, we
20 certainly would cooperate any way we could to facilitate
21 that. But it sounds like that's not going to happen
22 anyway, so I would prefer to use the --

23 **MS. BROWNLESS:** An excellent point,
24 Mr. Butler, and I'll go with that. Then there's a
25 seven-day response period according to the rule.

1 **MR. BUTLER:** Thank you.

2 **CHAIRMAN GRAHAM:** Okay. We're still on
3 preliminary matters. Does anybody else have any other
4 preliminary matters? Okay. Once again, we will go
5 through the Draft Prehearing Order section by section.
6 Feel free to speak up if there is a section that needs
7 to be changed or audited or fixed or altered or tweaked.

8 Section I. Section II. Section III. Section
9 IV.

10 **MS. BROWNLESS:** I'd just like to take an
11 opportunity to briefly mention a few points about
12 handling the confidential information. I want to make
13 clear that the Commissioners will be provided with
14 copies of all confidential materials that have been
15 prefiled and all confidential materials that are
16 contained in the exhibits on the composite exhibit list
17 which you should have been provided by email and we will
18 be updating.

19 The Commissioners will be provided with copies
20 of all confidential materials that are contained in
21 staff exhibits identified in the composite exhibit list.
22 To the extent that each party has confidential materials
23 that they wish to use as impeachment materials, please
24 make copies, make enough for everybody, put them in the
25 red folders. We counted up the number of copies that

1 you need to make if this is new material that people
2 haven't had, and it's 30 copies by the time all the
3 Commissioners get a copy and all the appropriate
4 parties. So we would suggest that that's the number of
5 copies you have.

6 You're responsible for preparing the copies
7 and putting them in the red folders and keeping them
8 safe, collecting -- handing them out and collecting
9 them. So I just wanted to be clear about that, sir.

10 **CHAIRMAN GRAHAM:** So we're not telling them to
11 bring enough for everybody. We're telling them to bring
12 at least 30 copies.

13 **MS. BROWNLESS:** Yes, sir.

14 **CHAIRMAN GRAHAM:** Was that it for Section IV?

15 **MS. BROWNLESS:** Yes, sir. That's it for
16 Section IV.

17 **CHAIRMAN GRAHAM:** Anybody else have anything
18 to add for Section IV? Section V.

19 **MS. BROWNLESS:** I think we've already talked
20 about the voir dire. That is -- to the extent that we
21 can -- oh, sorry, that's Section V. I was bleeding into
22 Section VI. I'm sorry.

23 **CHAIRMAN GRAHAM:** Anybody else in Section V?
24 Okay. Section VI.

25 **MS. BROWNLESS:** With regard to the order of

1 witnesses, we've listed them just by order of company.
2 And I understand that there's some other suggestions
3 about the order of witnesses, and, OPC, would you like
4 to respond?

5 **CHAIRMAN GRAHAM:** Mr. Sayler.

6 **MR. SAYLER:** Yes, Mr. Chairman. Erik Sayler
7 with the Office of Public Counsel. I had polled my
8 compadres on this side about potentially rearranging the
9 order of witnesses, but after further discussion, we'll
10 just go with the order in the Prehearing Conference --
11 in the Prehearing Order.

12 **CHAIRMAN GRAHAM:** Okay.

13 **MS. BROWNLESS:** Okay.

14 **CHAIRMAN GRAHAM:** Anybody else on Section VI,
15 order of witnesses?

16 **MS. BROWNLESS:** And we'd like to ask if the
17 parties have any objection to excusing the staff
18 witnesses, which are the staff auditors for each
19 company.

20 **MR. BUTLER:** None for FPL.

21 **MR. BERNIER:** No objection.

22 **MR. BEASLEY:** No objection.

23 **MR. BADDERS:** No objection.

24 **MS. KEATING:** No objection.

25 **MS. BROWNLESS:** Do any of the parties object

1 to excusing the auditor witnesses?

2 **MR. SAYLER:** Erik Sayler with OPC. We are
3 looking at one of the staff auditor witnesses related to
4 TECO. We got the audit work papers today. We're going
5 to review that, and hopefully by close of business
6 Wednesday can let you know whether we believe we'll have
7 any questions or not. The other ones we don't have any
8 questions for.

9 **MS. BROWNLESS:** Okay. So it's -- I'm sorry.
10 I didn't hear the company.

11 **MR. SAYLER:** TECO. I don't recall the
12 witness's, staff witness's name.

13 **MS. BROWNLESS:** That's fine. Does anybody
14 else have an issue with a staff witness?

15 **MR. LAVIA:** None for the Retail Federation.

16 **MS. PUTNAL:** I know we spoke about this with
17 Jon on Friday, and we're still looking at that issue.

18 **MS. BROWNLESS:** Just so we're having
19 everything come back from everybody at the same time,
20 would it be possible for you to let us know by 5:00
21 tomorrow?

22 **CHAIRMAN GRAHAM:** Actually OPC said 5:00 on
23 Wednesday.

24 **MS. BROWNLESS:** Well, just --

25 **CHAIRMAN GRAHAM:** You agreed to his 5:00 on

1 Wednesday, and you said to her you want to be
2 consistent.

3 **MS. BROWNLESS:** Oh, okay.

4 **MS. PUTNAL:** Yes, thank you.

5 **MS. BROWNLESS:** And also if you stipulate to
6 the witness, you'd stipulate to their exhibits; correct?

7 **MR. SAYLER:** Yes.

8 **MS. BROWNLESS:** Okay.

9 **CHAIRMAN GRAHAM:** Okay. Anything else on
10 order of witnesses?

11 **MS. BROWNLESS:** No, sir. With regard to any
12 witnesses that may be excused, we would certainly check
13 with the Commissioners to make sure that they could be
14 excused, and that will be reflected once we get your
15 input in the Prehearing Order.

16 **CHAIRMAN GRAHAM:** Okay. Section VIII.
17 Mr. Sayler.

18 **MR. SAYLER:** Yes, sir, Mr. Chairman. We do
19 have one typo that I picked up on page 8 of the
20 Prehearing Order. And instead of trying to point it out
21 exactly, I will email it to Ms. Brownless by -- is it
22 close of business tomorrow?

23 **MS. BROWNLESS:** Yes, sir, please.

24 **MR. SAYLER:** Okay.

25 **CHAIRMAN GRAHAM:** Okay. Anybody else, Section

1 VII? Section VIII.

2 **MS. BROWNLESS:** This is the same issue that
3 Lee Eng discussed in the 02 and 07 dockets which has to
4 do with FIPUG's position that respective utilities must
5 meet the burden of proof on an issue. We would let you
6 state your response again.

7 **MS. PUTNAL:** Thank you. We understand the
8 request for a more detailed response, and we will work
9 with you on providing that to you by the close of
10 business tomorrow.

11 **MS. BROWNLESS:** Okay. And to the extent that
12 positions are not provided by close of business
13 tomorrow, then we would deem that to be no position.
14 But we'll look forward to your responses.

15 **MS. PUTNAL:** Thank you.

16 **MS. CHRISTENSEN:** And just for clarification,
17 Office of Public Counsel, for those positions where we
18 will take no position, will be adding our caveat
19 language for those particular issues, and we will get
20 those to you by close of business.

21 **MS. BROWNLESS:** And, Patty, your Prehearing
22 Order had a lot of no positions at this time, and I
23 assume that's what you're talking about.

24 **MS. CHRISTENSEN:** Correct. I mean, obviously
25 the ones where we've taken specific positions, we're not

1 looking to change those.

2 **MS. BROWNLESS:** Oh, sure.

3 **MS. CHRISTENSEN:** But we will get you our
4 caveated no position language by close of business
5 tomorrow.

6 **MS. BROWNLESS:** Thank you.

7 **CHAIRMAN GRAHAM:** Mr. Butler.

8 **MR. BUTLER:** Would that apply to all other
9 parties? I know, for example, that Retail Federation
10 has a lot of no positions at this time.

11 **MR. LAVIA:** We will do the same.

12 **MR. BUTLER:** Okay.

13 **CHAIRMAN GRAHAM:** Anybody else on Section
14 VIII? Okay. Section IX, exhibit list.

15 **MS. BROWNLESS:** We have prepared a
16 Comprehensive Exhibit List, the latest version of which
17 was October 16th at 12:20 p.m. We will distribute a new
18 version with the changes. And I know that DEP [sic] has
19 provided some changes which were -- came after 12:20 on
20 the 16th, so we'll put all those in there, and we'll get
21 those out by 5:00 tomorrow.

22 **CHAIRMAN GRAHAM:** Mr. Sayler.

23 **MR. SAYLER:** Again, OPC picked up a small typo
24 on the Exhibit DJL-1 of Mr Lawton, it's the resumé of
25 Daniel J. Lawton, but I'll email that to staff as well

1 by COB tomorrow.

2 **CHAIRMAN GRAHAM:** Okay.

3 **MR. BUTLER:** Mr. Chairman, I would note that
4 on page 65 there's a series of exhibits for Mr. Yupp and
5 then two exhibits for Mr. Reed. Those relate to their
6 rebuttal testimony and, therefore, ought to be moved
7 down to page 71 at the beginning of the section that's
8 entitled "Rebuttal."

9 **CHAIRMAN GRAHAM:** Ms. Brownless.

10 **MS. BROWNLESS:** We'll move them, sir.

11 **CHAIRMAN GRAHAM:** Okay.

12 **MR. SAYLER:** Was that Yupp, GJY-6, Mr. Butler?

13 **MR. BUTLER:** Yes. The 6 through 10 are all
14 rebuttal exhibits and ought to go down in the rebuttal
15 section.

16 **MR. SAYLER:** And the same thing with both of
17 Mr. Reed's?

18 **MR. BUTLER:** With Mr. Reed, yes.

19 **MR. SAYLER:** Okay. Thank you.

20 **CHAIRMAN GRAHAM:** Anybody else, Section IX?
21 Section X.

22 **MS. BROWNLESS:** There are no stipulations at
23 this time. We have received several communications
24 about issues that can possibly be stipulated for all of
25 the companies, and we'll work very diligently to enter

1 into those stipulations. We'll try to work on that. To
2 the extent we can get something out to everybody by 5:00
3 tomorrow, we will, and we'll keep working on it.

4 **CHAIRMAN GRAHAM:** Anybody else, Section X?
5 Section XI.

6 **MS. BROWNLESS:** The only pending motion is the
7 motion that's already been discussed, which is OPC's
8 motion to strike.

9 **CHAIRMAN GRAHAM:** Section XII.

10 **MS. BROWNLESS:** There are several
11 confidentiality requests pending. We've got pretty much
12 all the confidentiality orders issued or they're in the
13 pipeline. I think we got two more confidentiality
14 requests today for discovery that just came in today.
15 I'll try my best to get those out before the end of the
16 week. Our goal is to have all confidentiality orders
17 for all exhibits and all identified exhibits and all
18 testimony finished and done by the hearing.

19 **CHAIRMAN GRAHAM:** Anybody else, Section XII?
20 Section XIII.

21 **MS. BROWNLESS:** With regard to post-hearing
22 procedures, in this docket I think there are two issues
23 that I'm fairly confident will not be stipulated: The
24 St. Lucie 2 2014 outage and hedging. There are other
25 issues which may, in fact, be stipulated, and with

1 regard to those, we could make a bench decision.

2 For the natural gas hedging and the
3 St. Lucie 2 outage issues and perhaps other identified
4 issues that can't be stipulated to, we would ask that
5 post-hearing briefs be 40 pages because the natural gas
6 hedging issue is a significant issue, and that those be
7 due on November 13th for consideration at the December
8 3rd Agenda Conference.

9 **CHAIRMAN GRAHAM:** Is everybody in agreement
10 with the 40 pages for the briefs and make sure they're
11 in by November 3rd? Mr. Sayler.

12 **MR. SAYLER:** Mr. Chairman, Office of Public
13 Counsel was going to ask, due to the large nature of the
14 hedging issues and the St. Lucie 2 outage, if you'd be
15 amenable to moving the filing deadline from Friday the
16 13th, which some people think is unlucky, to November
17 the 16th, which is a Monday, and also the position
18 statements going from 50 words to 100 words.

19 **CHAIRMAN GRAHAM:** What was last part again?

20 **MS. BROWNLESS:** Yeah.

21 **MR. SAYLER:** Currently the draft Prehearing
22 Order says the position statement should be 50 words.
23 We would like to expand that to 100 words.

24 **CHAIRMAN GRAHAM:** I don't have a problem with
25 going to the 100 words, but going from that Friday to

1 that Monday -- I guess the staff that's going to be
2 reviewing that, is that going to be a problem?

3 **MS. BROWNLESS:** Well, that's a pretty tight
4 timeline for us. That gives us no weekend under the
5 current schedule, and --

6 **CHAIRMAN GRAHAM:** I think we'll keep it on
7 Friday the 13th.

8 **MR. SAYLER:** Thank you.

9 **CHAIRMAN GRAHAM:** Anything else under Section
10 XIII?

11 **MS. BROWNLESS:** And the page limit at 40
12 pages, is everybody appropriate -- okay with that?

13 **CHAIRMAN GRAHAM:** Okay. Section XIV.

14 **MS. BROWNLESS:** We suggest that opening
15 statements should not exceed five minutes per party
16 unless the party chooses to waive its opening statement.

17 **MR. BUTLER:** Mr. Chairman, with respect to
18 FPL, I would ask your indulgence to have an extra five
19 minutes with respect to the St. Lucie outage. I think
20 we're in kind of a distinct position here that we'll be
21 covering our views on hedging and then also covering our
22 views on an entirely unrelated issue about nuclear plant
23 outage, and five minutes would be pretty tight to cover
24 both of those.

25 **CHAIRMAN GRAHAM:** Ms. Christensen.

1 **MS. CHRISTENSEN:** Yes, Commissioner. I would
2 ask for similar treatment, ten minutes in total. Five
3 minutes to deal with the hedging issues -- we're dealing
4 with all the companies, so, I mean, five minutes is
5 going to be tight as it is. We're actually -- if you
6 just give us ten minutes, we'll divvy it up amongst all
7 of the issues we have outstanding within our office
8 because we have the hedging, currently we have the
9 refueling outage, I believe we still have some FPUC
10 issues that may or may not get resolved by hearing, and
11 we may have to deal with all those in opening statement.
12 And if you'd just give us a block of ten minutes, we can
13 allocate that amongst ourselves in the office to address
14 all those issues. And if we can go shorter than ten, we
15 will most certainly do that.

16 **CHAIRMAN GRAHAM:** You do know how to motivate
17 me, don't you? I think both requests are reasonable. I
18 don't have a problem with going with ten minutes for
19 opening statements.

20 **MS. BROWNLESS:** That's perfectly fine. And
21 that's ten minutes for everybody or ten minutes for OPC
22 and FP&L?

23 **CHAIRMAN GRAHAM:** Ten minutes for everybody.
24 Don't feel like you've got to use them.

25 All right. Other matters.

1 **MS. BROWNLESS:** No, sir. I think that's it
2 for us.

3 **CHAIRMAN GRAHAM:** Anything else that needs to
4 come before us?

5 Ms. Putnal, welcome. I think this is the
6 first time you've been before me.

7 **MS. PUTNAL:** Thank you.

8 **CHAIRMAN GRAHAM:** It's good to have you here.
9 Actually tell Mr. Moyle to feel free to send you in his
10 place quite often. You tend to get to the point a lot
11 quicker than he does.

12 For those of you wearing pink, I'm sure most
13 of you have heard me say this before, breast cancer
14 awareness is a big thing for me. Mr. Butler, I noticed
15 quite -- it seems like every year now, he's a fellow
16 Georgia Tech alum, and I do -- it is duly noted. I do
17 appreciate those that are wearing it. Once again, I
18 think it's something very, very, very important. And if
19 there's nothing else to come before us, we're -- we will
20 adjourn Docket No. 1 for this prehearing, which I think
21 concludes the entire prehearing.

22 Once again, please travel safely. You never
23 know when something is going to come around the corner.
24 Make sure you get home safely. I look forward to seeing
25 you all November 2nd.

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MS. BROWNLESS: Yes, sir.

CHAIRMAN GRAHAM: And remember those two different dates, tomorrow end of the day, and there's one other specific that's Wednesday end of the day. That all being said, we're adjourned.

(Prehearing Conference adjourned at 3:23 p.m.)

1 STATE OF FLORIDA)
2 COUNTY OF LEON) : CERTIFICATE OF REPORTER

3
4 I, LINDA BOLES, CRR, RPR, Official Commission
5 Reporter, do hereby certify that the foregoing
6 proceeding was heard at the time and place herein
7 stated.

8 IT IS FURTHER CERTIFIED that I
9 stenographically reported the said proceedings; that the
10 same has been transcribed under my direct supervision;
11 and that this transcript constitutes a true
12 transcription of my notes of said proceedings.

13 I FURTHER CERTIFY that I am not a relative,
14 employee, attorney or counsel of any of the parties, nor
15 am I a relative or employee of any of the parties'
16 attorney or counsel connected with the action, nor am I
17 financially interested in the action.

18 DATED THIS 20th day of October, 2015.

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25


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