

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida
Power & Light Company

DOCKET NO.: 160021-EI

In re: Petition for approval of 2016-2018
storm hardening plan by Florida Power &
Light Company

DOCKET NO.: 160061-EI

In re: 2016 depreciation and
dismantlement study by Florida Power &
Light Company

DOCKET NO.: 160062-EI

In re: Petition for limited proceeding to
modify and continue incentive mechanism
by Florida Power & Light Company

DOCKET NO.: 160088-EI

FILED: August 2, 2016

**THE FLORIDA INDUSTRIAL POWER USERS GROUP'S
CROSS NOTICE OF TAKING DEPOSITION DUCES TECUM**

TO: ALL PARTIES

Pursuant to Rule 1.310, Florida Rules of Civil Procedure, notice is hereby given that the Florida Industrial Power Users Group (FIPUG) will take the deposition of the following named individual(s).

NAME	DATE AND TIME	ADDRESS
ROBERT E. BARRETT	Wednesday, August 3, 2016, 8:30 a.m.	Room 382D Gerald L. Gunter Bldg. 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850
MORAY P. DEWHURST	Thursday, August 4, 2016, 3:30 p.m.	Room 382D Gerald L. Gunter Bldg. 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

ROSEMARY MORLEY	Friday, August 5, 2016, 8:30 a.m.	Room 382D Gerald L. Gunter Bldg. 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850
MICHAEL BROSCHE	Tuesday, August 9, 2016, 1:30 p.m.	Room 382D Gerald L. Gunter Bldg. 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850
NED W. ALLIS	Thursday, August 11, 2016, 8:30 a.m.	Florida Power & Light Co. 700 Universe Blvd. Juno Beach, FL 33418
KEITH FERGUSON	Thursday, August 11, 2016, 30 minutes following the conclusion of the deposition of Ned W. Allis	Florida Power & Light Co. 700 Universe Blvd. Juno Beach, FL 33418
ROBERT B. HEVERT	Tuesday, August 16, 2016, 8:30 a.m.	Room 382D Gerald L. Gunter Bldg. 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850
ROXANNE R. KENNEDY	Tuesday, August 16, 2016, 4:00 p.m.	Office of Public Counsel 111 W. Madison St. Rm. 812 Tallahassee, FL 32399

The deponent is instructed to bring with him/her to the deposition any and all documents, photographs, workpapers, memorandums, correspondence, related to this matter which the witness possesses, or has received, referenced, relied upon or which was supplied to the witness by any person or party in connection with this matter or which was supplied by the witness to any person or party in connection with this matter.

The deposition will be taken upon oral examination before an official court reporter or other officer authorized by law to take depositions.

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 Procedure and the Rules of the Florida Public Service Commission.

/s/ Jon C. Moyle

Jon C. Moyle, Jr.
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301
Telephone: (850) 681-3828
jmoyle@moylelaw.com

Attorneys for Florida Industrial Power Users Group

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail this 2nd day of August, 2016, to the following:

Suzanne Brownless
Florida Public Service Commission
2540 Shumard Oak Blvd., Room 110
Tallahassee, FL 32399-0850
sbrownle@psc.state.fl.us

R. Wade Litchfield
John T. Butler
Maria J. Moncada
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
wade.litchfield@fpl.com
john.butler@fpl.com
maria.moncada@fpl.com

Ken Hoffman
Florida Power & Light Company
215 South Monroe Street, Suite 810
Tallahassee, Florida 32399-1400
Ken.hoffman@fpl.com

J.R. Kelly, Esq.
Charles J. Rehwinkel
John Truitt
Patricia Christensen
Office of Public Counsel
111 West Madison Street, room 812
Tallahassee, FL 32301
kelly.jr@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
truitt.john@leg.state.fl.us
Christensen.patty@leg.state.fl.us

Derrick Price Williamson
Spilman Thomas & Battle, PLLC
1100 Bent Creek Boulevard, Suite 101
Mechanicsburg, PA 17050
dwilliamson@spilmanlaw.com

Stephanie U. Roberts
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NC 27103

sroberts@spilmanlaw.com

Kenneth Wiseman
Mark Sundback
William M. Rappolt
Andrews Kurth LLP
1350 I Street NW, Suite 1100
Washington, D.C. 20005
kwiseman@andrewskurth.com
msundback@andrewskurth.com
wrappolt@andrewskurth.com

Federal Executive Agencies
Thomas A. Jernigan
AFCEC/JA-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, FL 32403
Thomas.Jernigan.3@us.af.mil

John B. Coffman
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
(573 424-6779
jonh@johncoffman.net

Robert Scheffel Wright
John T. LaVia
Gardner, Bist, Bowden, Bush, Dee, LaVia
& Wright, PA
1300 Thomaswood Drive
Tallahassee, FL 32308
schef@gbwlegal.com
jlavia@gbwlegal.com

/s/ Jon C. Moyle

Jon C. Moyle, Jr