

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Evaluation of storm restoration costs for Florida Power & Light Company related to Hurricane Irma.

DOCKET NO.: 20180049-EI

FILED: April 8, 2019

**NOTICE OF TELEPHONIC DEPOSITION DUCES TECUM**

TO: Kenneth M. Rubin  
Florida Power & Light Company  
700 Universe Blvd.  
Juno Beach, FL 33418  
[ken.rubin@fpl.com](mailto:ken.rubin@fpl.com)

NOTICE is hereby given that pursuant to Rule 28-106.206, Florida Administrative Code and Florida Rule of Civil Procedure 1.310, the Office of Public Counsel will take the deposition of the following named individual at the location and time indicated below:

NAME	DATE and TIME	LOCATION
Ronald R. Reagan	Friday, April 26, 2019 9:00 A.M.	Florida Power & Light Company 700 Universe Blvd. Juno Beach, Florida 33408-0420

The deponent is requested to bring the following documents:

1. Regarding vendor rates, all studies or analyses relied on by FPL that purportedly demonstrate the use of a blended rate is more cost effective than an hourly rate by job type, as referenced in the rebuttal testimony of Ronald R. Reagan at page 8, lines 14-22.
2. All market studies and reports relied on to support Mr. Reagan's claim that, for Hurricane Irma restoration, FPL obtained the best and lowest rate it could, based on experience and the market conditions at that time, as referenced in the rebuttal testimony of Ronald R. Reagan at page 10, lines 2-5 and page 12, lines 7-8.
3. All studies, analyses and reports personally prepared by Mr. Reagan that support Mr. Reagan's contention that Mr. Schultz's referenced range of rates is not accurate, as stated in the rebuttal testimony of Ronald R. Reagan at page 12, lines 12-20.

4. All studies, analyses and reports relied upon by Mr. Reagan that support Mr. Reagan's contention that Mr. Schultz's referenced range of rates is not accurate, as stated in the rebuttal testimony of Ronald R. Reagan at page 12, lines 12-20.
5. All studies, analyses and reports prepared by FPL that support the contention that Mr. Schultz's referenced range of rates is not accurate, as stated in the rebuttal testimony of Ronald R. Reagan at page 12, lines 12-20.
6. All studies, reports and analyses performed by Mr. Reagan in which he personally evaluated storm costs and/or analyzed vendor resource restoration rates charged by vendors located outside the state of Florida for responding to restore hurricane damage and/or other weather events outside of Florida. See rebuttal testimony of Ronald R. Reagan at page 13, lines 1-12.
7. All studies, reports and analyses relied upon by Mr. Reagan in which the storm costs and/or vendor resource restoration rates charged by vendors located outside the state of Florida for responding to restore hurricane damage and/or other weather events outside of Florida were analyzed. See rebuttal testimony of Ronald R. Reagan at page 13, lines 1-12.
8. All studies, reports and analyses performed by Mr. Reagan in which he personally evaluated storm costs and/or analyzed vendor resource restoration rates charged to *utilities other than FPL* by vendors located outside the state of Florida for responding to restore hurricane damage and/or other weather events *inside* of Florida. See rebuttal testimony of Ronald R. Reagan at page 13, lines 1-12.
9. All studies, reports and analyses relied upon by Mr. Reagan in which the storm costs and/or analyzed vendor resource restoration rates charged to *utilities other than FPL* by vendors located inside the state of Florida for responding to restore hurricane damage and/or other weather events *inside* of Florida were analyzed. See rebuttal testimony of Ronald R. Reagan at page 13, lines 1-12.
10. All studies, analyses and reports relied upon by Mr. Reagan that support Mr. Reagan's assertion that "[I]ine contractors are likely to negotiate for and charge different rates for responding to different types of events in different parts of the country" on page 13, lines 6-8 of his rebuttal testimony.
11. All studies, reports and analyses personally performed by Mr. Reagan, or prepared by someone else and relied on by Mr. Reagan, that show mobilization/demobilization rates charged by external vendors to utilities are generally higher than the working rate charged by external vendors to those utilities, as stated in the rebuttal testimony of Ronald R. Reagan at page 20, lines 15-23 and page 21, lines 1-2.

A telephonic conference line will be made available if a party wishes to participate telephonically and has made arrangements to view confidential information. This deposition shall 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, and for any other purposes allowed under the Florida Rules of Civil Procedure and the Rules of the Florida Public Service Commission.

Please govern yourselves accordingly.

Respectfully Submitted

J.R. KELLY  
PUBLIC COUNSEL

/s/ Stephanie A. Morse  
Stephanie Morse  
Associate Public Counsel

Patricia A. Christensen  
Associate Public Counsel

Charles J. Rehwinkel  
Deputy Public Counsel

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400  
(850) 488-9330

Attorneys for the Citizens  
of the State of Florida

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 8th day of April, 2018, to the following:

Suzanne Brownless/Ashley Weisenfeld  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[sbrownle@psc.state.fl.us](mailto:sbrownle@psc.state.fl.us)  
[awaisenf@psc.state.fl.us](mailto:awaisenf@psc.state.fl.us)

Robert Scheffel Wright/John T. LaVia  
Representing Florida Retail Federation  
Gardner Law Firm  
1300 Thomaswood Drive  
Tallahassee FL 32308  
[jlavia@gbwlegal.com](mailto:jlavia@gbwlegal.com)  
[schef@gbwlegal.com](mailto:schef@gbwlegal.com)

Ken Hoffman  
Florida Power & Light Company  
215 South Monroe Street, Suite 810  
Tallahassee FL 32301  
[ken.hoffman@fpl.com](mailto:ken.hoffman@fpl.com)

Jon C. Moyle, Jr./Karen A. Putnal  
c/o Moyle Law Firm, PA  
Florida Industrial Power Users Group  
118 North Gadsden Street  
Tallahassee FL 32301  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)  
[kputnal@moylelaw.com](mailto:kputnal@moylelaw.com)

Kenneth M. Rubin/Kevin Donaldson  
Florida Power & Light Company  
700 Universe Blvd.  
Juno Beach, Florida 33408-0420  
[ken.rubin@fpl.com](mailto:ken.rubin@fpl.com)  
[kevin.donaldson@fpl.com](mailto:kevin.donaldson@fpl.com)

Eugene Hennelly  
Balyasny Asset Management L.P.  
101 California Street, Suite 4600 | San  
Francisco, CA | 94111  
[ehennelly@Bamfunds.com](mailto:ehennelly@Bamfunds.com)

/s/Stephanie A. Morse  
Stephanie A. Morse  
Associate Public Counsel  
Florida. Bar No. 0068713