

**BEFORE THE PUBLIC SERVICE COMMISSION**

In Re: Proposed Adoption of Rule 25-6.030, F.A.C.,  
Storm Protection Plan and Rule 25-6.031, F.A.C., Storm  
Protection Plan Recovery Clause

Docket No.: 20190131-EU

Filed: October 30, 2019

**CORRECTED**  
**NOTICE OF DEPOSITION DUCES TECUM**

TO: Duke Energy Florida, LLC  
Dianne M. Triplett, Esq.  
299 First Avenue North  
St. Petersburg, FL 33701  
[dianne.triplett@duke-energy.com](mailto:dianne.triplett@duke-energy.com)

Matthew R. Bernier, Esq.  
106 East College Avenue, Suite 800  
Tallahassee, FL 32301  
[matthew.bernier@duke-energy.com](mailto:matthew.bernier@duke-energy.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 individuals at the location and time indicated below:

NAME	DATE and TIME	LOCATION
Duke Energy Florida, LLC (DEF) Corporate Representative, or Panel of Corporate Representatives, as described below.	Monday, November 18, 2019 3:00 p.m. Or date and time mutually agreed.	Office of Public Counsel 111 W. Madison Street, Rm 812 Tallahassee, Florida 32399-1400

Please produce as a corporate representative the following person or persons:

1. Who can explain in detail the entire planning process for undergrounding projects.
2. Who can explain the accounting treatment of AFUDC for such undergrounding projects.
3. Who can describe the ongoing undergrounding projects contained in the Storm Hardening Plans the Commission approved on July 9, 2019.

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,

/s/J. R. Kelly

J. R. Kelly

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 to the following parties on this 30<sup>th</sup> day of October, 2019.

Adria Harper  
Andrew King  
Office of General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL32399-0850  
[aharper@psc.state.fl.us](mailto:aharper@psc.state.fl.us)  
[aking@psc.state.fl.us](mailto:aking@psc.state.fl.us)

Cindy Miller  
Cindy Miller LLC  
1544 Cristobal Drive  
Tallahassee FL 32303  
[milcindy@gmail.com](mailto:milcindy@gmail.com)

James D. Beasley  
J. Jeffrey Wahlen  
Malcolm N. Means  
Tampa Electric Company  
Post Office Box 391  
Tallahassee, Florida 32302  
[jbeasley@ausley.com](mailto:jbeasley@ausley.com)  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)  
[mmeans@ausley.com](mailto:mmeans@ausley.com)

Joint Administrative Procedures Committee  
Ken Plante, Coordinator  
680 Pepper Building  
111 W. Madison Street  
Tallahassee, FL 32399  
[joint.admin.procedures@leg.state.fl.us](mailto:joint.admin.procedures@leg.state.fl.us)

Tampa Electric Company  
Ms. Paula K. Brown  
Regulatory Affairs  
P. O. Box 111  
Tampa, FL 33601-0111  
[regdept@tecoenergy.com](mailto:regdept@tecoenergy.com)

Kenneth A. Hoffman  
Florida Power & Light Company  
134 West Jefferson Street  
Tallahassee, FL 32301-1713  
[Ken.Hoffman@fpl.com](mailto:Ken.Hoffman@fpl.com)

Dianne Triplett  
Matthew R. Bernier  
Duke Energy Florida  
106 East College Avenue, Suite 800  
Tallahassee, FL 32301  
[Dianne.triplett@duke-energy.com](mailto:Dianne.triplett@duke-energy.com)  
[matthew.bernier@duke-energy.com](mailto:matthew.bernier@duke-energy.com)

Russell Badders  
Holly Henderson  
Gulf Power Company  
215 S. Monroe St., Suite 618  
Tallahassee, FL 32301  
[Russell.badders@nexteraenergy](mailto:Russell.badders@nexteraenergy)  
[Holly.henderson@nexteraenergy.com](mailto:Holly.henderson@nexteraenergy.com)

Robert Scheffel Wright  
Gardner Law Firm  
1300 Thomaswood Drive  
Tallahassee FL 32308  
[schef@gbwlegal.com](mailto:schef@gbwlegal.com)

Jon C. Moyle, Jr.  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, FL 32301  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)

Samantha Cibula  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[scibula@psc.state.fl.us](mailto:scibula@psc.state.fl.us)

James W. Brew  
1025 Thomas Jefferson Street, NW  
Eight Floor, West Tower  
Washington, DC 20007  
[jbrew@smxblaw.com](mailto:jbrew@smxblaw.com)

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe Street, Suite 601  
Tallahassee, FL 32301  
[bkeating@gunster.com](mailto:bkeating@gunster.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)

*/s/J. R. Kelly*  
J. R. Kelly  
Public Counsel