Dorothy Menasco

Leon, Jack [Jack.Leon@fpl.com] From:

Thursday, March 19, 2009 2:24 PM Sent:

Filings@psc.state.fl.us To:

Anderson, Bryan; PETTUS, CARLA; cguyton@ssd.com Cc:

Electronic Filing for Docket Nos. 080407-EG, et al. / FEECA Utilities' Notice of Service of Joint Objections to Subject:

FSC's 1st Set of Interrogatories (Nos. 1-7) and 1st Request for Production of Documents (Nos. 1-3)

Attachments: FEECA Utilities' Notice of Joint Objections to FSC's 1st Set of Interrogatories (Nos. 1-7) and 1st Request for

Production of Documents (Nos. 1-3).pdf

Electronic Filing

a. Person responsible for this electronic filing:

Joaquin E. Leon, Esquire Florida Power & Light Company 9250 W. Flagler St., Suite 6514 Miami, FL 33174 (305) 552-3922 jack.leon@fpl.com

b. Docket Nos. 080407-EG, et al.

In re: Commission review of numeric conservation goals (Florida Power & Light Company, et al.).

- c. Documents are being filed on behalf of Florida Power & Light Company, Progress Energy Florida, Inc., Tampa Electric Company, Gulf Power Company, Florida Public Utilities Company, Orlando Utilities Commission, and Jacksonville Electric Authority (FEECA Utilities).
- d. There are a total of 4 pages in the attached document.
- e. The document attached for electronic filing is FEECA Utilities' Notice of Service of Joint Objections to FSC's 1st Set of Interrogatories (Nos. 1-7) and 1st Request for Production of Documents (Nos. 1-3).

Thank you for your attention and cooperation to this request.

Jack Leon Senior Attorney Florida Power & Light Company 9250 W. Flagler St., Suite 6514 Miami, FL 33174 (305) 552-3922

Fax: (305) 552-4911 Cell: (305) 439-1661

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric conservation goals (Florida Power & Light Company).	DOCKET NO. 080407-EG
In re: Commission review of numeric conservation goals (Progress Energy Florida, Inc.).	DOCKET NO. 080408-EG
In re: Commission review of numeric conservation goals (Tampa Electric Company).	DOCKET NO. 080409-EG
In re: Commission review of numeric conservation goals (Gulf Power Company).	DOCKET NO. 080410-EG
In re: Commission review of numeric conservation goals (Florida Public Utilities Company).	DOCKET NO. 080411-EG
In re: Commission review of numeric conservation goals (Orlando Utilities Commission).	DOCKET NO. 080412-EG
In re: Commission review of numeric conservation goals (JEA).	DOCKET NO. 080413-EG

NOTICE OF SERVICE OF FEECA UTILITIES' JOINT OBJECTIONS TO FLORIDA SOLAR COALITION'S FIRST SET OF INTERROGATORIES (NOS. 1-7) AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-3)

Filed: March 19, 2009

Florida Power & Light Company, Progress Energy Florida, Inc., Tampa Electric Company, Gulf Power Company, Florida Public Utilities Company, Orlando Utilities Commission, and JEA (hereinafter "FEECA Utilities"), give notice of service of their Joint Objections to Florida Solar Coalition's First Set of Interrogatories (Nos. 1-7) and First Request for Production of Documents (Nos. 1-3) to Suzanne Brownless.

DOCUMENT NO. DATE

02393-09 3/19/08

FPSC - COMMISSION CLERK

Respectfully submitted this 19th day of March, 2009.

R. Wade Litchfield, Vice President and Chief Regulatory Counsel Carla Pettus, Senior Attorney Attorneys for Florida Power & Light Company 700 Universe Boulevard Juno Beach, Florida 33408-0420 Telephone: (561) 691-7101

Facsimile: (561) 691-7135

ON BEHALF OF FEECA UTILITIES

By:

Carla Pettus, Esquire

House Counsel No. 53011

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished electronically and by United States mail this 19th day of March, 2009, to the following:

Katherine E. Fleming, Senior Attorney Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Mr. Richard F. Spelman, President GDS Associates, Inc. 1850 Parkway Place, Suite 800 Marietta, GA 30067

Susan Clark, Esquire Radey Law Firm 301 South Bronough Street Suite 200 Tallahassee, FL 32301 Attorney for Florida Power & Light Company

John T. Burnett, Esquire P.O. Box 14042 Saint Petersburg, FL 33733-4042 Attorney for Progress Energy Service Company, LLC

Tampa Electric Company Ms. Paula K. Brown Regulatory Affairs P. O. Box 111 Tampa, FL 33601-0111 E. Leon Jacobs, Jr., Esquire
Williams & Jacobs, LLC
1720 S. Gadsden St., MS 14
Suite 201
Tallahassee, FL 32301
Attorney for Southern Alliance for Clean
Air/Natural Resources

Mr. Michael Ting Principal Consultant Itron, Inc. Consulting and Analysis Services 1111 Broadway, Suite 1800 Oakland, CA 94607

Paul Lewis, Jr., Esquire 106 East College Avenue, Suite 800 Tallahassee, FL 32301-7740 Attorney for Progress Energy Florida, Inc.

Florida Solar Coalition c/o Suzanne Brownless 1975 Buford Blvd. Tallahassee, FL 32308

Lee L. Willis, II, Esquire
James D. Beasley, Esquire
Ausley Law Firm
Post Office Box 391
Tallahassee, FL 32302
Attorneys for Tampa Electric Company

Steven R. Griffin, Esquire
Beggs & Lane Law Firm
501 Commendencia Street
Pensacola, FL 32502
Attorney for Gulf Power Company

Florida Public Utilities Company Mr. John T. English, Esquire P. O. Box 3395 West Palm Beach, FL 33402-3395

Jacksonville Electric Authority
Ms. Teala A. Milton
V.P., Government Relations
21 West Church Street, Tower 16
Jacksonville, FL 32202-3158

Lakeland Electric
Mr. Jeff Curry
501 East Lemon Street
Lakeland, FL 33801

Jeremy Susac Executive Director Florida Energy and Climate Commission c/o Governor's Energy Office 600 South Calhoun Street, Suite 251 Tallahassee, Florida 32399-0001 Gulf Power Company Ms. Susan D. Ritenour One Energy Place Pensacola, FL 32520-0780

Orlando Utilities Commission Mr. Chris Browder P. O. Box 3193 Orlando, FL 32802-3193

Mr. Bob Krasowski 1086 Michigan Ave. Naples, FL 34103

Norman H. Horton, Jr., Esquire Messer Law Firm Post Office Box 15579 Tallahassee, FL 32317 Attorneys for Florida Public Utilities Company

By: Carla Pettus, Esquire