Ruth Nettles

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

Sent: Tuesday, May 19, 2009 12:59 PM

To: Filings@psc.state.fl.us

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

Subject: Electronic Filing for Docket Nos. 080407-EG, et al. / Notice of Service of Objections to Staff's 3rd Set of

Interrogatories (Nos. 12-18) & 2nd Request for Production of Documents (Nos. 2-4)

Attachments: FPL's Notice of Service of Objections to Staff's 3rd Set of Interrogatories (Nos. 12-18) & 2nd Request for

Production of Documents (Nos. 2-4)_5-19-09.pdf

Electronic Filing

a. Person responsible for this electronic filing: Joaquin E. Leon, Esquire 9250 W. Flagler St., Suite 6514 Miami, FL 33174

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.
- **d.** There are a total of 4 pages in the attached document.
- e. The document attached for electronic filing is Florida Power & Light Company's Notice of Service of Objections to Staff's 3rd Set of Interrogatories (Nos. 12-18) & 2nd Request for Production of Documents (Nos. 2-4).

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
	Filed: May 19, 2009

NOTICE OF SERVICE OF FLORIDA POWER & LIGHT COMPANY'S OBJECTIONS TO STAFF'S THIRD SET OF INTERROGATORIES (NOS. 12-18) AND SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 2-4)

Florida Power & Light Company ("FPL") gives notice of service of its objections to the Staff of the Florida Public Service Commission's Third Set of Interrogatories (Nos. 12-18) and Second Request for Production of Documents (Nos. 2-4) to Katherine E. Fleming, with a copy to all parties on the attached Certificate of Service.

04931 MAY 198

FPSC-COMMISSION CLERK

Respectfully submitted this 19th day of May, 2009.

R. Wade Litchfield, Vice President of Regulatory Affairs 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

By:

Carla Pettils, Esquire Authorized 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 May, 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