## **Dorothy Menasco**

From:

Ann Bassett [abassett@lawfla.com]

Sent:

Tuesday, May 26, 2009 4:46 PM

To:

Filings@psc.state.fl.us

Subject:

Docket No. 090172-El

Attachments: 2009-05-26, FGT's NOS of Preliminary Objections to FPL 1st ROg and 1st POD.pdf

The person responsible for this electronic filing is:

Floyd R. Self, Esq. Messer, Caparello & Self, P.A. P.O. Box 15579 Tallahassee, FL 32317 (850) 222-0720 fself@lawfla.com

The Docket No. is 090172-EI - Petition to determine need for Florida EnergySecure Pipeline by Florida Power & Light Company

This is being filed on behalf of Florida Gas Transmission Company, LLC.

Total Number of Pages is 5

Florida Gas Transmission Company, LLC's Notice of Serving its Preliminary Objections to Florida Power & Light Company's First Set of Interrogatories (Nos. 1-32) and First Request for Production of Documents (Nos. 1-7)

Ann Bassett Messer, Caparello & Self, P.A. 2618 Centennial Place (32308) P.O. Box 15579 Tallahassee, FL 32317

Direct Phone: 850-201-5225 Fax No. 850-224-4359

Email Address: <abassett@lawfla.com> Web Address: <www.lawfla.com>

DOCUMENT NUMBER-DATE

& S

Attorneys At Law

www.lawfla.com

May 26, 2009

## VIA ELECTRONIC FILING

Ms. Ann Cole, Commission Clerk Office of Commission Clerk Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re:

Docket No. 090172-EI

Dear Ms. Cole:

Enclosed for filing on behalf of Florida Gas Transmission Company, LLC is Florida Gas Transmission Company, LLC's Notice of Serving its Preliminary Objections to Florida Power & Light Company's First Set of Interrogatories (Nos. 1-32) and First Request for Production of Documents (Nos. 1-7) in the above referenced docket.

Thank you for your assistance with this filing.

Sincerely yours

Floyd R. Self-

FRS/amb Enclosure

cc:

Mr. Michael T. Langston

Parties of Record

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to determine need for Florida EnergySecure Pipeline by Florida Power & Light Company.	)	Docket No. 090172-EI Dated: May 26, 2009
	)	

FLORIDA GAS TRANSMISSION COMPANY, LLC'S NOTICE
OF SERVING IT'S PRELIMINARY OBJECTIONS TO FLORIDA POWER AND LIGHT
COMPANY'S FIRST SET OF INTERROGATORIES (NOS. 1-32) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-7)

Florida Gas Transmission Company, LLC ("FGT") by and through its undersigned counsel, hereby files and serves Notice that it has served its Preliminary Objections to Florida Power and Light Company's First Set of Interrogatories (Nos. 1-32) and First Request for Production of Documents (Nos. 1-7) by electronic mail on John T. Butler at john.butler@fpl and by U. S. Mail on John T. Butler, Esq., Florida Power & Light Company, 700 Universe Boulevard, Juno Beach, FL 33408-0420, and by electronic mail on Gary Perko at gperk@hgslaw.com and by U. S. Mail on Gary V. Perko, Esq., Hopping Green & Sams, 123 South Calhoun Street, Tallahassee, FL 32301, on this 26<sup>th</sup> day of May, 2009.

FLOYOR. SELF, ESQ.

MESSER, CAPARELLO & SEPF, P. A.

Post Office Box 15579 Tallahassee, FL 32317 (850) 222-0720

Attorneys for Florida Gas Transmission Company, LLC

05223 MAY 26 8

FPSC-COMMISSION CLERK

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing have been served by Electronic Mail (\*) and/or U.S. Mail this 26<sup>th</sup> day of May, 2009 upon the following:

Martha Brown, Esq.\*
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

John T. Butler, Esq.\*
Mr. R. Wade Litchfield
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420

Gary V. Perko, Esq.\*
Brooke E. Lewis, Esq.
Hopping Green & Sams
P.O. Box 6526
Tallahassee, FL 32314

Howard E. Adams\*
Pennington Law Firm
P.O. Box 100956
Tallahassee, FL 32302-0095

Ms. Kim Watson\*
Kinder Morgan Energy Partners, L.P.
500 Dallas St., Suite 10000
Houston, TX 77002

Ms. Laura Heckman\*
Kinder Morgan Energy Partners, L.P.
500 Dallas St., Suite 1000
Houston, TX 77002

Bradford County
Board of County Commissioners
Clerk
P.O. Drawer B
Starke, FL 32091-1286

Brevard County
Board of County Commissioners
Clerk
P.O. Box 999
Titusville, FL 32781-0999

Clay County
Board of County Commissioners
Clerk
P.O. Box 698
Green Cove Springs, FL 32043-0698

Flagler County
Board of County Commissioners
Clerk
Kim C. Hammond Justice Center
1769 East Moody Blvd., Bldg. 1
Bunnell, FL 32110-5991

Indian River County
Board of County Commissioners
Clerk
1840 25th Street
Vero Beach, FL 32960-3365

Martin County
Board of County Commissioners
Clerk
2401 S.E. Monterey Road
Stuart, FL 34996-3397

Okeechobee County
Board of County Commissioners
Clerk
304 N. W. 2<sup>nd</sup> Street
Okeechobee, FL 34972-4146

Orange County
Board of County Commissioners
Clerk
P.O. Box 38
Orlando, FL 32802-0038

Osceola County
Board of County Commissioners
Clerk
1 Courthouse Square, Suite 4400
Kissimmee, FL 32741-5440

Palm Beach County
Board of County Commissioners
Clerk
P.O. Box 4036
West Palm Beach, FL 33402-4036

Putnam County
Board of County Commissioners
Clerk
P.O. Box 758
Palatka, FL 32178-0758

Seminole County
Board of County Commissioners
Clerk
P.O. Drawer C
Sanford, FL 32772-0659

St. Lucie County
Board of County Commissioners
Clerk
2300 Virginia Avenue
Fort Pierce, FL 34982-5652

Central Florida Regional Planning Council Ms. Patricia Steed P.O. Drawer 2089 Bartow, FL 33831

City Clerk
City of Palm Coast
2 Commerce Boulevard
Palm Coast, FL 32164-3126

Clerk of Circuit Court Indian River County P.O. Box 1028 Vero Beach, FL 32961-1028

Clerk of Circuit Court
St. Lucie County
221 South Indian River Drive
Fort Pierce, FL 34950-4315

County Manager/Clerk Volusia County 123 West Indiana Avenue Deland, FL 32720-4612

Mr. Charles Gauthier
Division of Community Planning
Department of Community Affairs
2555 Shumard Oak Blvd.
Tallahassee, FL 32399-2100

Mr. Michael P. Halpin
Department of Environmental Protection
Siting Coordination Office
2600 Blair Stone Road, MS 48
Tallahassee, FL 32301

Mr. Frederick P. Gaske, Director Department of State Division of Historical Resources 500 S. Bronough Street Tallahassee, FL 32399-0250

Director of Administration Department of Transportation 605 Suwannee St. Tallahassee, FL 32399-0450

Mr. Phil Laurien
East Central Florida Regional Planning Council
631 North Wymore Road, Suite 100
Maitland, FL 32751

Mr. D. David, Northeast Regional Director Florida Fish and Wildlife Conservation Commission 1239 S.W. 10<sup>th</sup> Street Ocala, FL 34471-0323

Mr. G. Holder, Southwest Regional Director 3900 Drane Field Road Lakeland, FL 33811-1299

Ms. Brenda Buchan Governor's Energy Office 600 S. Calhoun Street, Suite 251 Tallahassee, FL 32399

Mr. Scott R. KoonsNorth Central Florida Regional Planning Council2009 N.W. 67 Place, Suite AGainesville, FL 32653-1603

Mr. Biran D. Teeple
Northeast Florida Regional Planning Council
6850 Belfort Oaks Place
Jacksonville, FL 32216

South Florida Water Management District Poinciana Professional Park 2640 Golden Gate Parkway, Suite 205 Naples, FL 34105

South Florida Water Management District 8211 West Broward Boulevard Plantation, FL 33324

South Florida Water Management District 10 High Point Road, Suite A Tavernier, FL 33070 South Florida Water Management District 780 SE Indian Street Stuart, FL 34997

South Florida Water Management District 205 North Parrott Avenue, Suite 201 Okeechobee, FL 34972

South Florida Water Management District 1707 Orlando Central Parkway, Suite 20 Orlando, FL 32809

South Florida Water Management District 3301 Gun Club Road, Building B-2 West Palm Beach, FL 33406

St. Johns River Water Management District P.O. Box 1429 Palatka, FL 32178-1429

Treasure Coast Regional Planning Council Michael Busha 421 S.W. Camden Avenue

Floyd R. Self

Stuart, FL 34994