

**Ruth Nettles**

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**From:** ljacobs50@comcast.net  
**Sent:** Thursday, July 09, 2009 8:07 PM  
**To:** Filings@psc.state.fl.us  
**Subject:** NRDC-SACE Objections to FPL's 1st Set of Interrogatories and 1st Request for Production of Documents  
**Attachments:** NRDC-SACE Notice of Svc of objectns to FPL 1st discovery FINAL.pdf

a. The person responsible for this filing is:

E. Leon Jacobs, Jr.  
Williams & Jacobs  
1720 S. Gadsden St. MS 14  
Tallahassee, Fl 32301  
(850) 222-1246  
ljacobs50@comcast.net

b. This filing is made in: Docket Nos. 080407-080413 Numeric Conservation Goals:

c. This document is filed on behalf of the Natural Resources Defense Counsel and the Southern Alliance for Clean Energy, Inc.

d. The total pages in the attached document are four.

e. The document consists of NRDC-SACE's Objections to FPL's 1st Set of Interrogatories and 1st Request for Production of Documents

WILLIAMS & JACOBS, LLC

ATTORNEYS AT LAW  
1720 S. GADSDEN ST. MS. 14  
TALLAHASSEE, FL 32301

MOSES WILLIAMS, ESQ.

E. LEON JACOBS, JR., ESQ.

July 9, 2009

Ann Cole  
Director, Office of the Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd  
Tallahassee, Florida 32399-0850

RE: Docket No. 080407-EG Florida Power & Light Company;  
Docket No. 080408-EG Progress Energy, Florida, Inc. ;  
Docket No. 080409-EG Tampa Electric Company;  
Docket No. 080410-EG Gulf Power Company ;  
Docket No. 080411-EG Florida Public Utilities Company;  
Docket No. 080412-EG Orlando Utilities C; and  
Docket No. 080413-EG Jacksonville Electric Authority

Dear Ms. Cole:

On behalf of the Southern Alliance for Clean Energy, and the Natural Resources Defense Council, I have enclosed for filing Notice of Service of NRDC-SACE' Objections to the First Set of Interrogatories (nos. 1-8), and the First Request for Production of Documents (Nos. 1-8) filed by Florida Power & Light on NRDC and SACE. I thank you for your attention to this matter.

Sincerely,

*/s/ E. Leon Jacobs, Jr.*

E. Leon Jacobs, Jr.  
Attorney for Intervenors

Enclosures

DOCUMENT NUMBER-DATE

06912 JUL 10 8

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Commission Review of Numeric ) DOCKET NO. 080407-EG  
Conservation Goals )  
Florida Power & Light Company )  
\_\_\_\_\_ )

In re: Commission Review of Numeric ) DOCKET NO. 080408-EG  
Conservation Goals )  
Progress Energy, Florida, Inc. )  
\_\_\_\_\_ )

In re: Commission Review of Numeric ) DOCKET NO. 080409-EG  
Conservation Goals )  
Tampa Electric Company )  
\_\_\_\_\_ )

In re: Commission Review of Numeric ) DOCKET NO. 080410-EG  
Conservation Goals )  
Gulf Power Company )  
\_\_\_\_\_ )

In re: Commission Review of Numeric ) DOCKET NO. 080411-EG  
Conservation Goals )  
Florida Public Utilities Company )  
\_\_\_\_\_ )

In re: Commission Review of Numeric ) DOCKET NO. 080412-EG  
Conservation Goals )  
Orlando Utilities Commission )  
\_\_\_\_\_ )

In re: Commission Review of Numeric ) DOCKET NO. 080413-EG  
Conservation Goals )  
Jacksonville Electric Authority )  
\_\_\_\_\_ )

**NOTICE OF SERVICE OF**  
**INTERVENORS NATURAL RESOURCES DEFENSE COUNCIL AND**  
**SOUTHERN ALLIANCE FOR CLEAN ENERGY, INC.**  
**OBJECTIONS TO FLORIDA POWER & LIGHT'S**  
**FIRST SET OF INTERROGATORIES (NOS 1-8) AND**  
**FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-8)**

**NOTICE IS HEREBY GIVEN** that Intervenor, the Natural Resources Defense Council and the Southern Alliance for Clean Energy, Inc., by and through their undersigned attorney,

DOCUMENT NUMBER-DATE

06912 JUL 10 8

FPSC-COMMISSION CLERK

have on the 9th day of July, 2009, filed their Objections to Florida Power & Light's First Set of Interrogatories Nos. 1-8 upon NRDC & SACE, and Florida Power & Light's First Request for Production of Documents Nos. 1-8.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy and correct copy of the foregoing was served on this 9<sup>th</sup> day of July, 2009 via email (\*) and/or US Mail on:

<p>Katherine Fleming, Esq. *  Erik L. Slayer, Esq. *  Florida Public Service Commission  Gerald L. Gunter Building  2540 Shumard Oak Boulevard  Tallahassee, Florida 32399-0850  <u>KEFLEMIN@PSC.STATE.FL.US</u>  <u>esayler@PSC.STATE.FL.US</u></p>	<p>J.R. Kelly / Stephen Burgess *  Office of Public Counsel  c/o The Florida Legislature  11 I W. Madison Street, Room 8 12  Tallahassee, FL 32399-1400  <u>kelly.jr@leg.state.fl.us</u></p>
<p>Jack Leon, Esq., *  Wade Litchfield, Esq. *  Florida Power &amp; Light Company  215 S. Monroe Street, Suite 810  Tallahassee, Florida 32301-1859  <u>Jack.Leon@fpl.com</u>  <u>Wade.Litchfield@fpl.com</u></p>	<p>Mr. Paul Lewis, Jr. *  Progress Energy Florida  106 East College Avenue, Suite 800  Tallahassee, FL 32301-7740  <u>paul.lewisjr@pgnmail.com</u></p>
<p>John T. Burnett / R. Alexander Glenn *  Progress Energy Service Company, LLC  Post Office Box 14042  St. Petersburg, FL 33733-4042  <u>john.burnett@pgnmail.com</u></p>	<p>Paula K. Brown *  Tampa Electric Company  Regulatory Affairs  P. O. Box 111  Tampa, FL 33601-0111  <u>regdept@tecoenergy.com</u></p>
<p>Susan D. Ritenour *  Gulf Power Company  One Energy Place  Pensacola, FL 32520-0780  <u>sdriteno@southernco.com</u></p>	<p>John T. English  Florida Public Utilities Company  P. O. Box 3395  West Palm Beach, FL 33402-3395</p>
<p>Chris Browder *  Orlando Utilities Commission  P. O. Box 3193  Orlando, FL 32802-3193  <u>cbrowder@ouc.com</u></p>	<p>Teala M. Milton *  JEA  V.P., Government Relations  21 West Church Street, Tower 16  Jacksonville, FL 32202-3158  <u>milta@jea.com</u></p>
<p>Suzanne Brownless, Esq. *  1975 Buford Boulevard  Tallahassee, FL 32308  <u>suzannebrownless@comcast.net</u>   James D. Beasley, Esq., *  Lee L. Willis, Esq. *  Ausley Law Firm</p>	<p>Jeremy Susac *  Florida Energy Commission  600 South Calhoun Street, Suite 251  Tallahassee, FL 32399-001  <u>jeremy.susac@eog.myflorida.com</u>   Susan Clark, Esq. *  Radey Law Firm</p>

