

080407-EG

EXHIBIT B

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FPSC-COMMISSION CLERK

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CONFIDENTIAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric conservation goals for Florida Power & Light Company.

DOCKET NO. 080407-EG

FLORIDA SOLAR COALITION'S REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA POWER & LIGHT COMPANY NOS. 1-3

Florida Solar Coalition (FSC), pursuant to Rule 1.350, Florida Rules of Civil Procedure, by and through the undersigned attorney, hereby serves the following request for production of documents upon Florida Power & Light Company (FPL).

Please produce these documents to Suzanne Brownless, Suzanne Brownless, P.A., 1975 Buford Blvd., Tallahassee, FL 32308 within thirty (30) days.

DEFINITIONS AND INSTRUCTIONS

A. As used herein, the following words shall have the meanings indicated:

(i) "Person" or "persons" shall mean and include natural persons, corporations, partnerships, associations, joint ventures, proprietorships, entities and all other forms of organizations and associations.

(ii) "Document" or "report" shall mean any kind of written, typed, recorded, or graphic matter, however produced or reproduced, of any kind or description, whether sent or received, including originals, non-identical copies and drafts and both sides thereof; and including, but not limited to: e-mails, papers, books, letters, correspondence, telegrams, bulletins, notices, announcements, charts, instructions, manuals, brochures, schedules, cables, telex messages, memoranda, notes, notations, accountants' work papers, transcripts, minutes, agendas, reports and recordings of telephonic or other conversations, of interviews, of conferences, or of other meetings, affidavits, statements, summaries, opinions, reports, studies, analyses, evaluations, contracts, agreements, journals, statistical records, desk calendars, appointment books, diaries, lists, tabulations, sound recordings, computer print-outs, data processing input and output, microfilms, and all other records kept by electronic, photographic, or mechanical means and things similar to any of the foregoing, however, denominated by you, and any other documents as defined in Rule 1.350, Florida Rules of Procedure.

(iii) "Identify" shall mean: 1) when used in reference to a natural person, give the person's full name, business or residence address, business or residence telephone numbers, occupation and employer; 2) when used with reference to an entity, give the entity's full name, principal place of business, address and telephone number; 3) when used with reference to a document, give the document's date, title, author recipient, type (e.g., letter, memorandum, note), name of the custodian of the document, and a description of the contents with sufficient specificity to be the basis for discovery; and 4) when used with reference to an action taken by an entity, identify the person(s) taking the action, describe the nature of the action, and give the date on which the action was taken. If any action identified pursuant to (4) involved a communication with another person, identify the person(s) with whom the actor(s) communicated; and if, the communication was through the use of a document, identify the document through which the communication was made.

DOCUMENT NUMBER-DATE

08989 AUG 31 8

FPSC-COMMISSION CLERK


(iv) If FPL maintains that any documentation or record which refers to or relates to anything about which these production requests ask or that would be responsive to any of the production requests has been destroyed, set forth the contents of said document, the location of any copies of said document, the date and circumstances of said destruction and the name of the person who ordered or authorized such destruction;

(v) In answering these production requests, furnish all information and responsive documents in the possession of FPL or in the possession of any of FPL employees, contract personnel, agents, representatives or attorney(s).

DOCUMENT REQUESTS

1. Please provide a copy of the Request for Proposals (RFP) for the technical potential study in the FEECA dockets referenced by Ms. Clark at the November 3, 2008 workshop. [T. 9]
2. Please provide a copy of the Economic and Achievable Scope of Work, and any and all revisions to that document, entered into between Florida Power & Light Company and other collaborative members and Itron for this docket.
3. Please provide copies of the memorandum of understanding (MOU) entered into between FPL and the other FEECA utilities with regard to the technical potential study and the amended MOU for the economic and achievable potential study referred to by Ms. Clark at the December 15, 2008 workshop.

Respectfully submitted this 4th day of March, 2009 by:




Suzanne Brownless, Esq.
Fla. Bar No. 309591
Suzanne Brownless, P.A.
1975 Buford Blvd.
Tallahassee, FL 32308
Phone: (850) 877-5200; FAX: (850) 878-0090

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been provided by U.S. Mail and email, this 4th day of March, 2009 to the following persons:

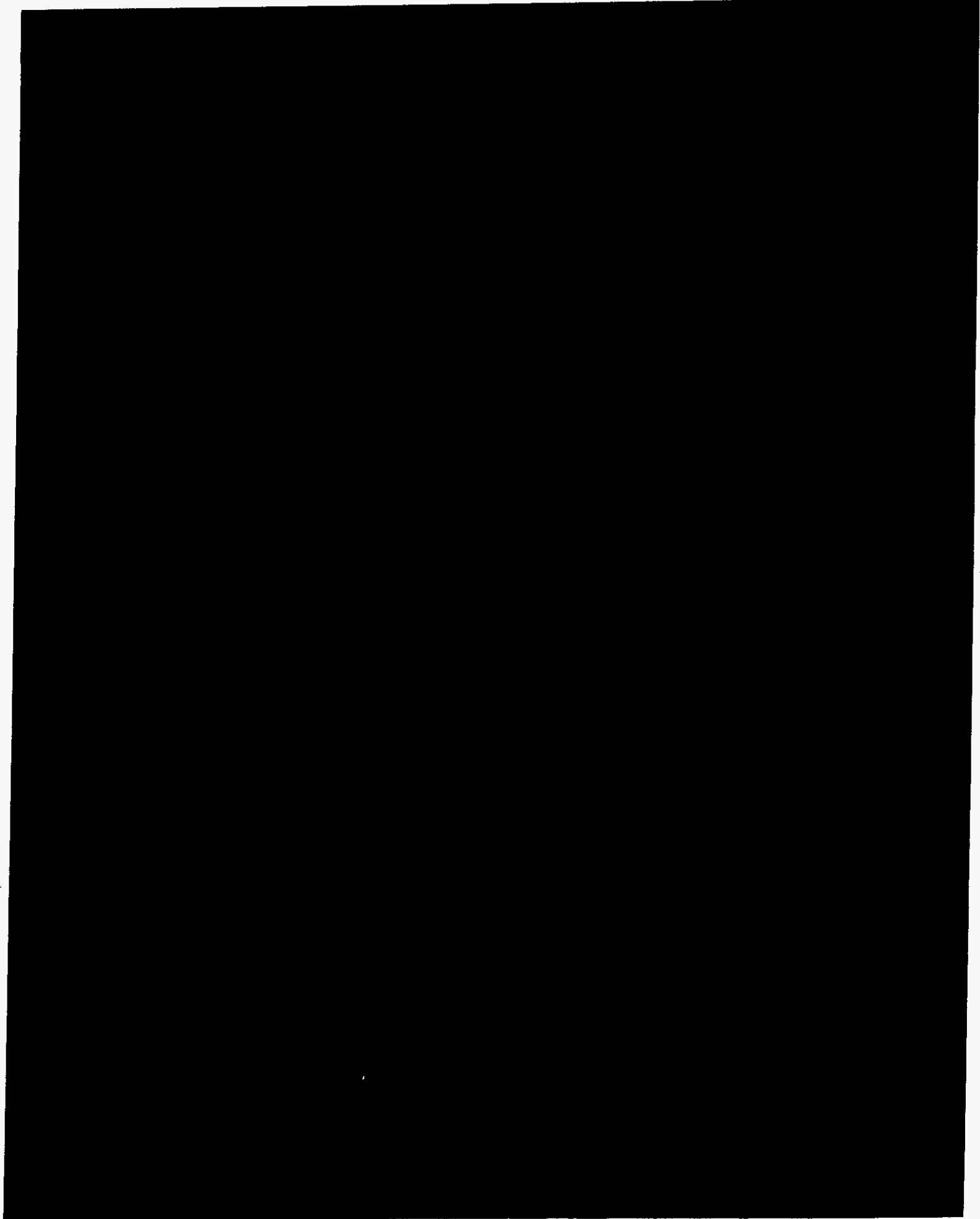
Katherine Fleming, Esq. Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 keflem@psc.state.fl.us	J.R. Kelly, Esq. Stephen Burgess, Esq. Office of Public Counsel 111 West Madison Street, room 812 Tallahassee, Florida 32399-1400 burgess.steve@leg.state.fl.us
Wade Litchfield, Esq. Florida Power & Light Co. 215 South Monroe Street, Suite 810 Tallahassee, Florida 32301 wade_litchfield@fpl.com	Paul Lewis, Jr. Progress Energy Florida, Inc. 106 East College Avenue, Suite 800 Tallahassee, Fla. 32301-7740 paul.lewisjr@pgnmail.com
John T. Burnett, Esq. Progress Energy Service Company, LLC P.O. Box 14042 St. Petersburg, Fla. 33733-4042 john.burnett@pgnmail.com	Paula K. Brown TECO Regulatory Affairs P.O. Box 111 Tampa, Florida 33601-0111 Regdept@tecoenergy.com
Susan D. Ritenour Gulf Power Company One Energy Place Pensacola, Fla. 32520-0780 sdriteno@southernco.com	John T. English Florida Public Utilities Co. P.O. Box 3395 West Palm Beach, Fla. 33402-3395
Norman H. Horton, Jr. Esq. Messer, Caparello & Self, PA P.O. Box 15579 Tallahassee, Fla. 32317 nhorton@lawfla.com	Susan F. Clark, Esq. Radey, Thomas, Yon & Clark, PA 301 South Bronough Street, Suite 200 Tallahassee, Florida 32301 sclark@radeylaw.com
Steven R. Griffin, Esq. Beggs & Lane Law Firm 501 Commendancia Street Pensacola, Fla. 32502 srg@beggslane.com	James D. Beasley, Esq. Lee L. Willis, Esq. Ausley Law Firm P.O. Box 391 Tallahassee, Florida 32302

Chris Browder P.O. Box 3193 Orlando, FL 32802-3193 bknibbs@ouc.com	Teala A. Milton V.P., Government Relations 21 West Church Street, Tower 16 Jacksonville, Florida 32202-3158 milta@jea.com
Jeff Curry Lakeland Electric Utility Company 501 East Lemon Street Lakeland, Florida 33801 jeff.curry@lakelandelectric.com	



Suzanne Brownless
Fla. Bar No. 309591

c:FEECAcert



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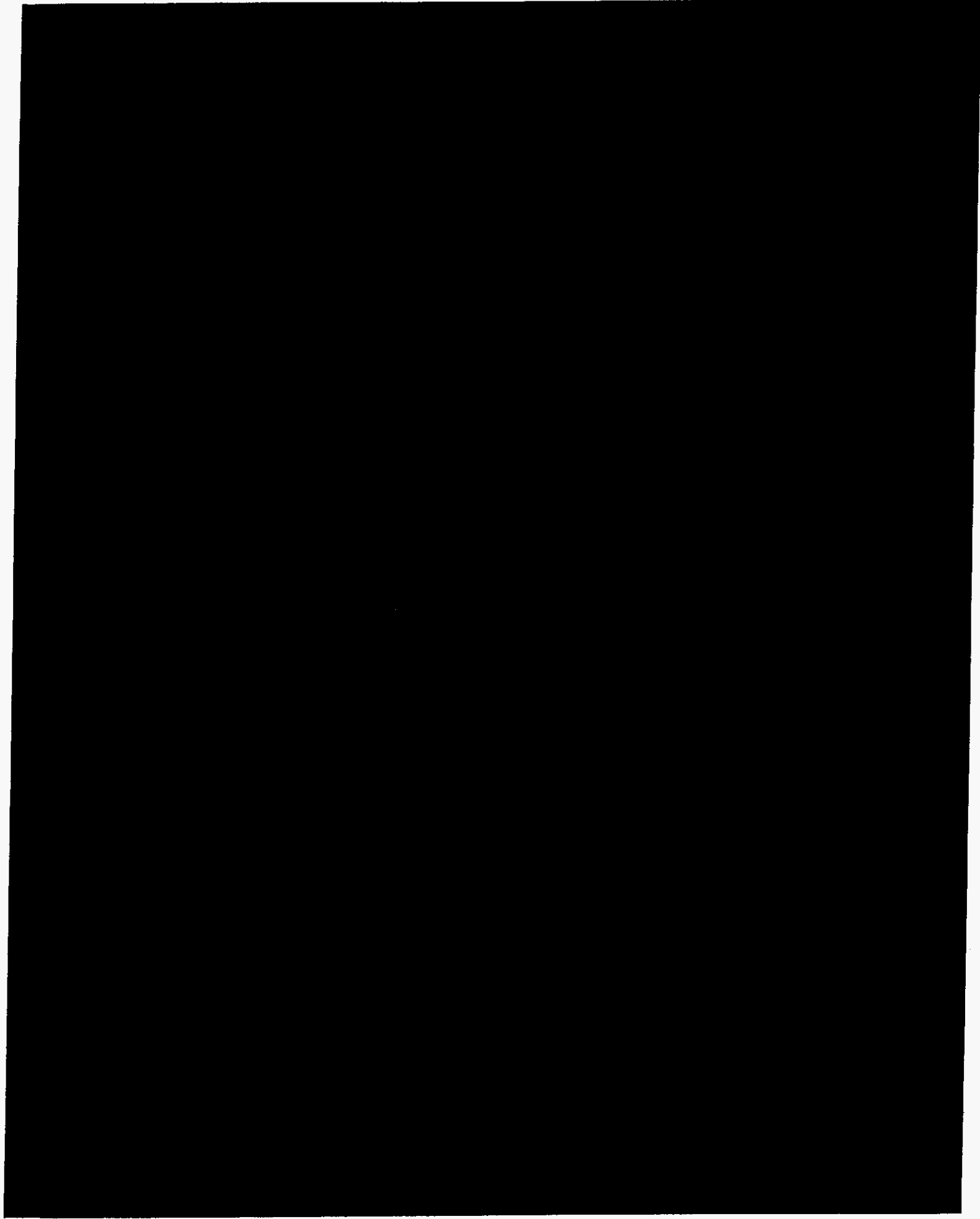
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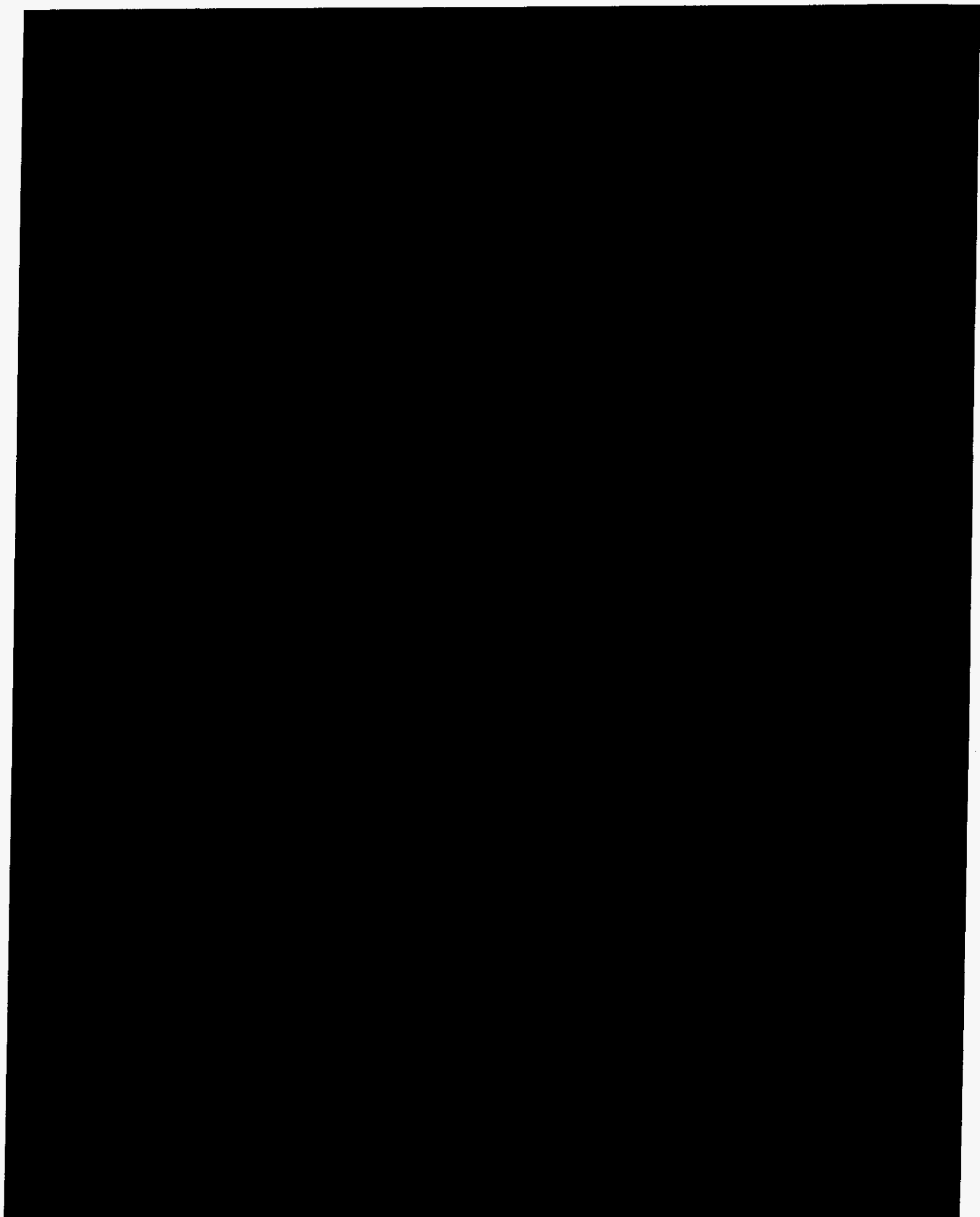
...the seventeenth of these is the fact that the ...

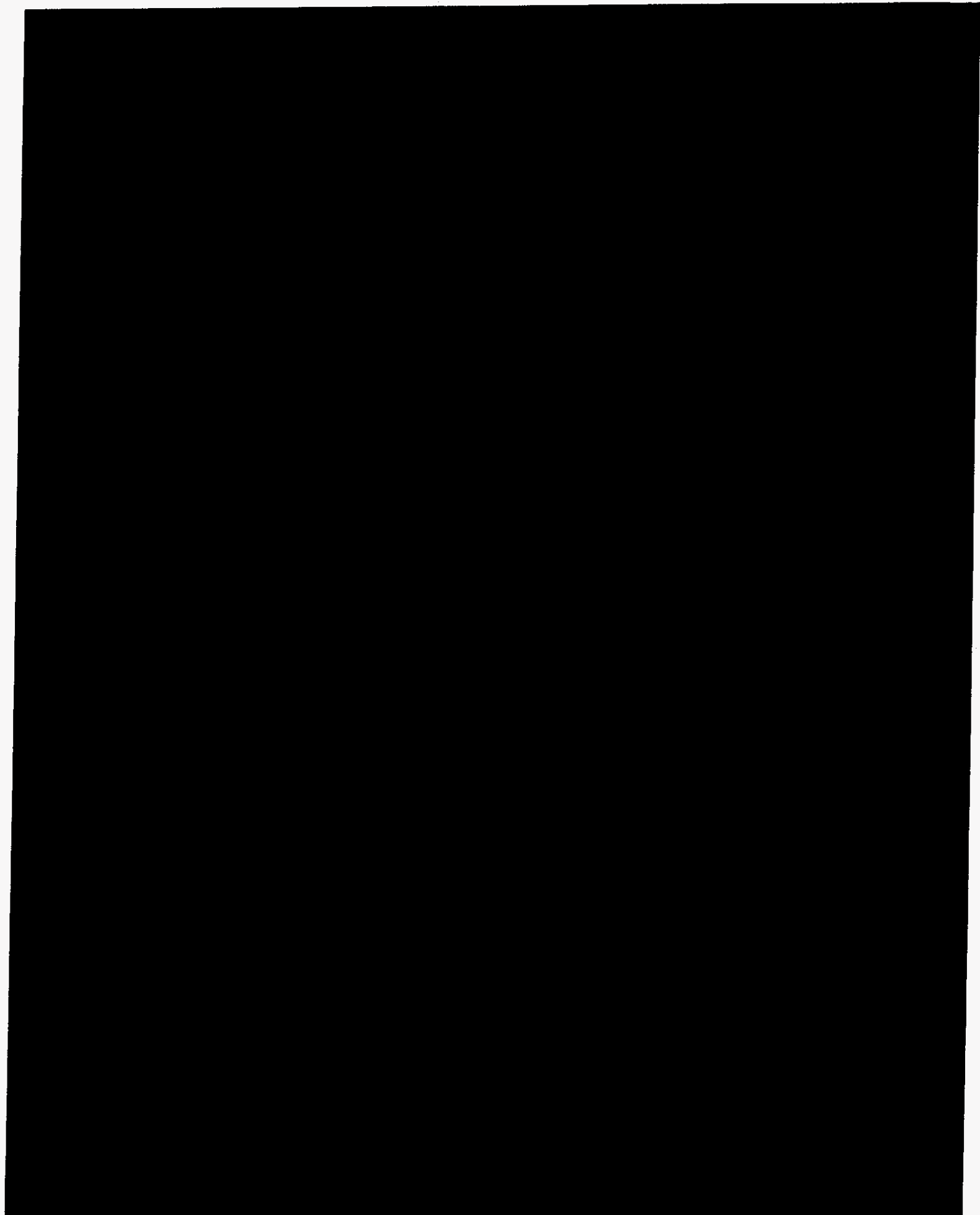
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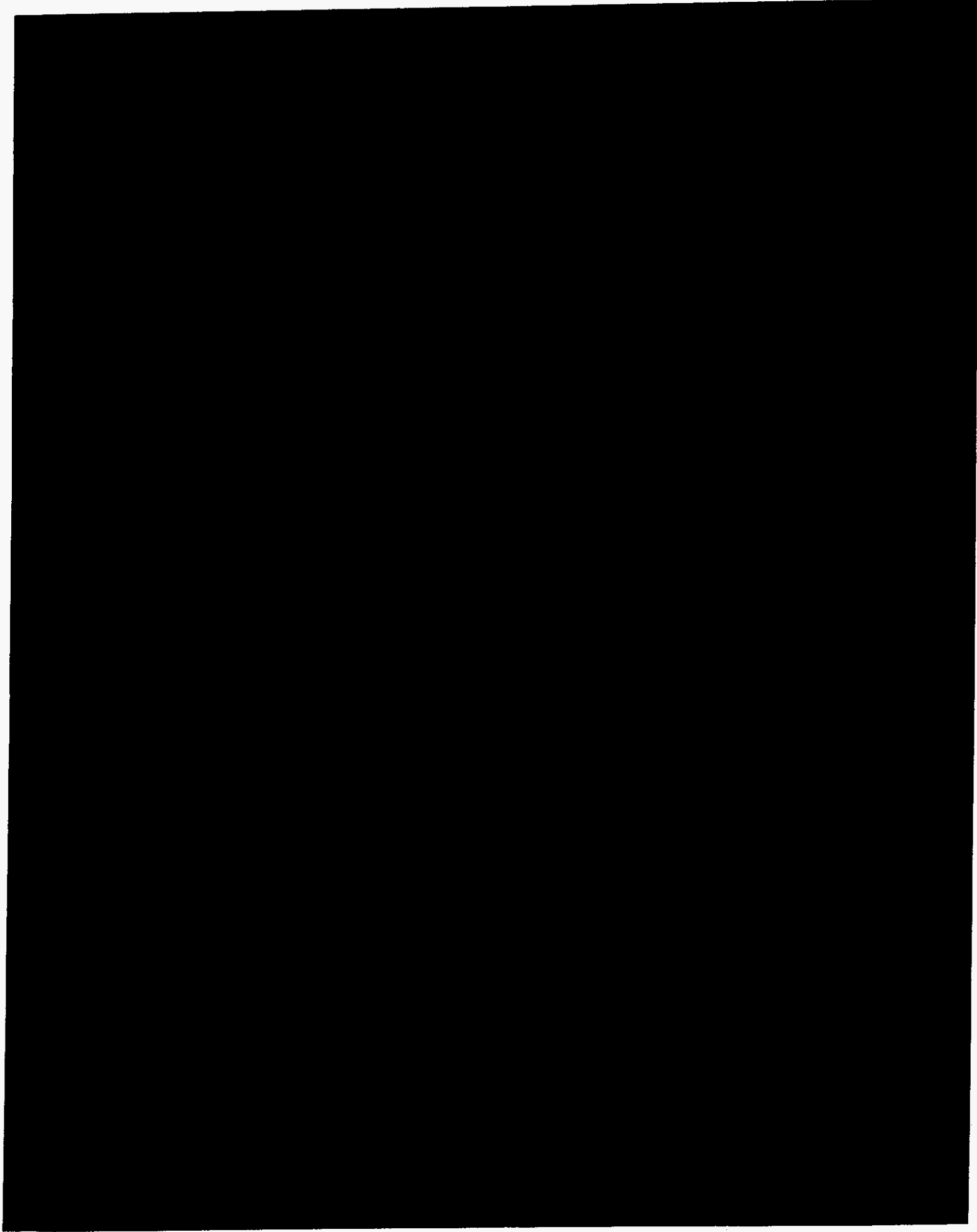
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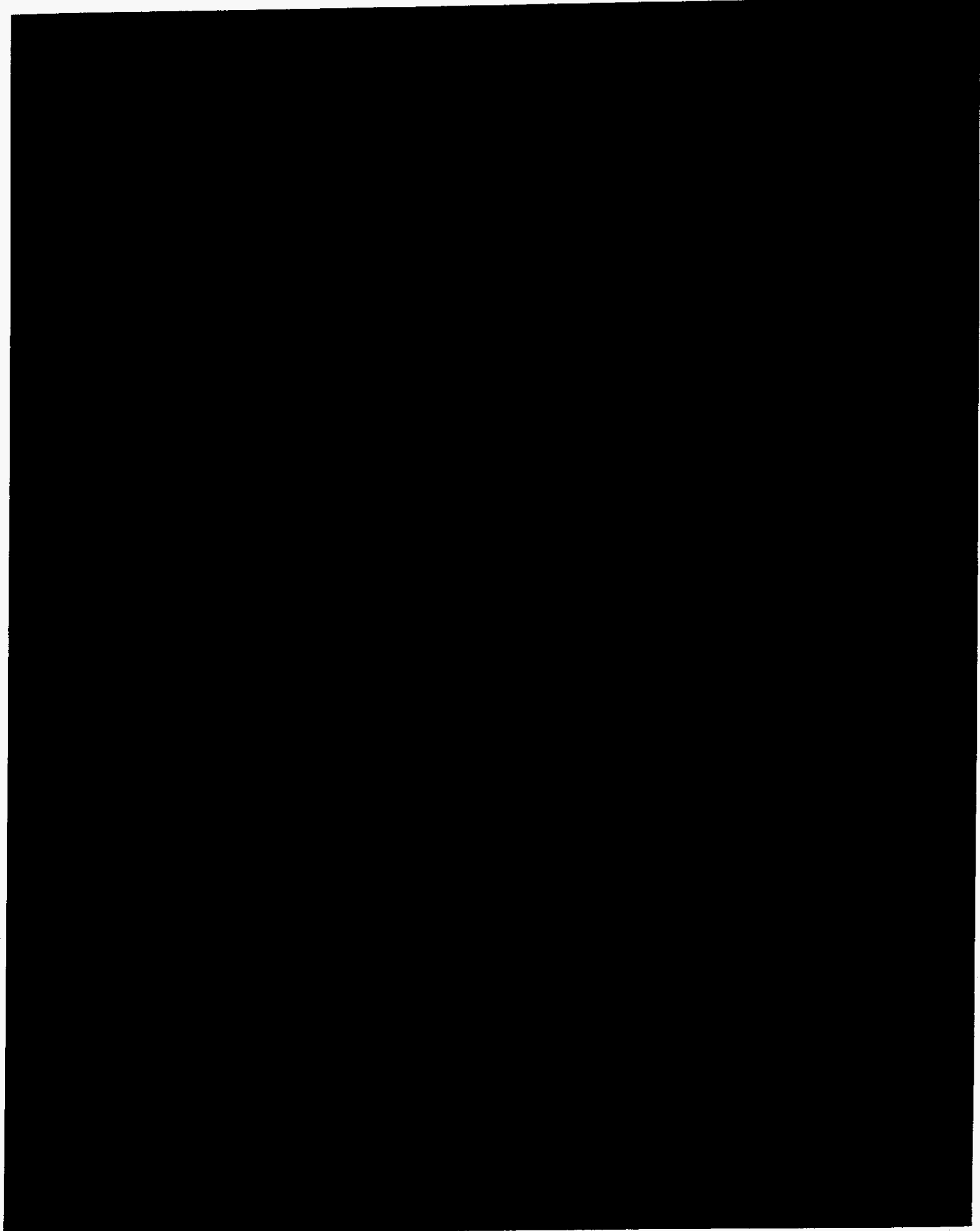
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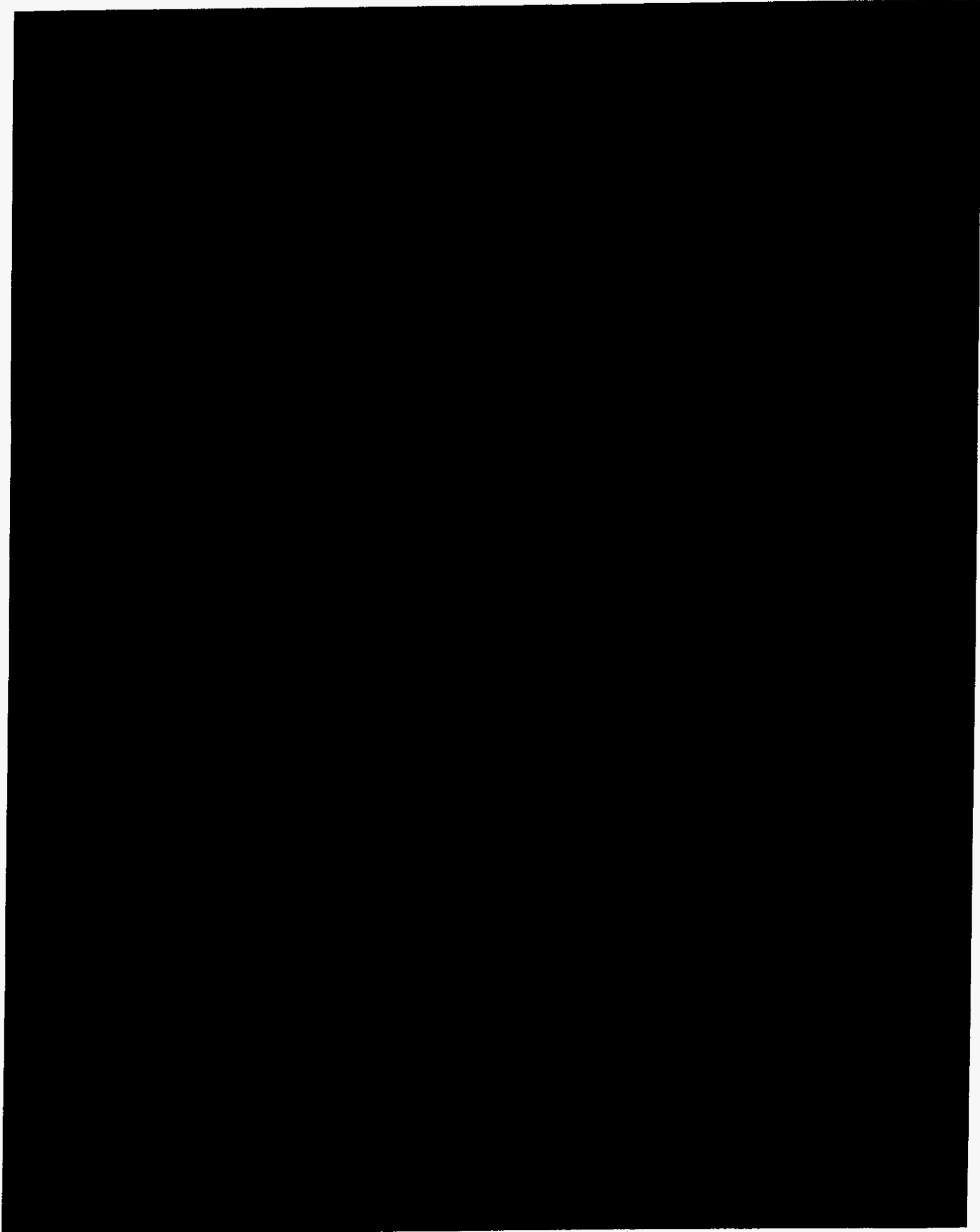


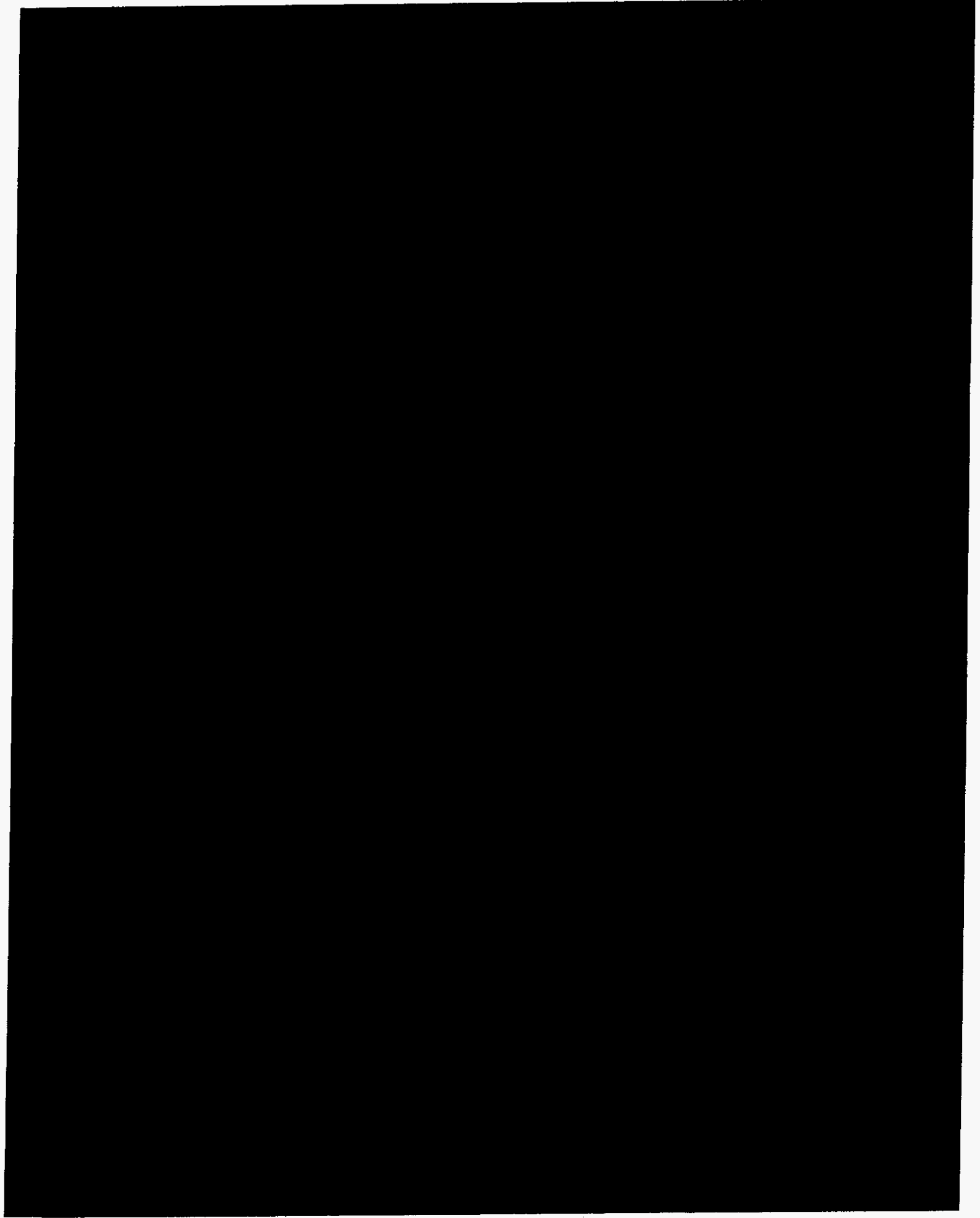


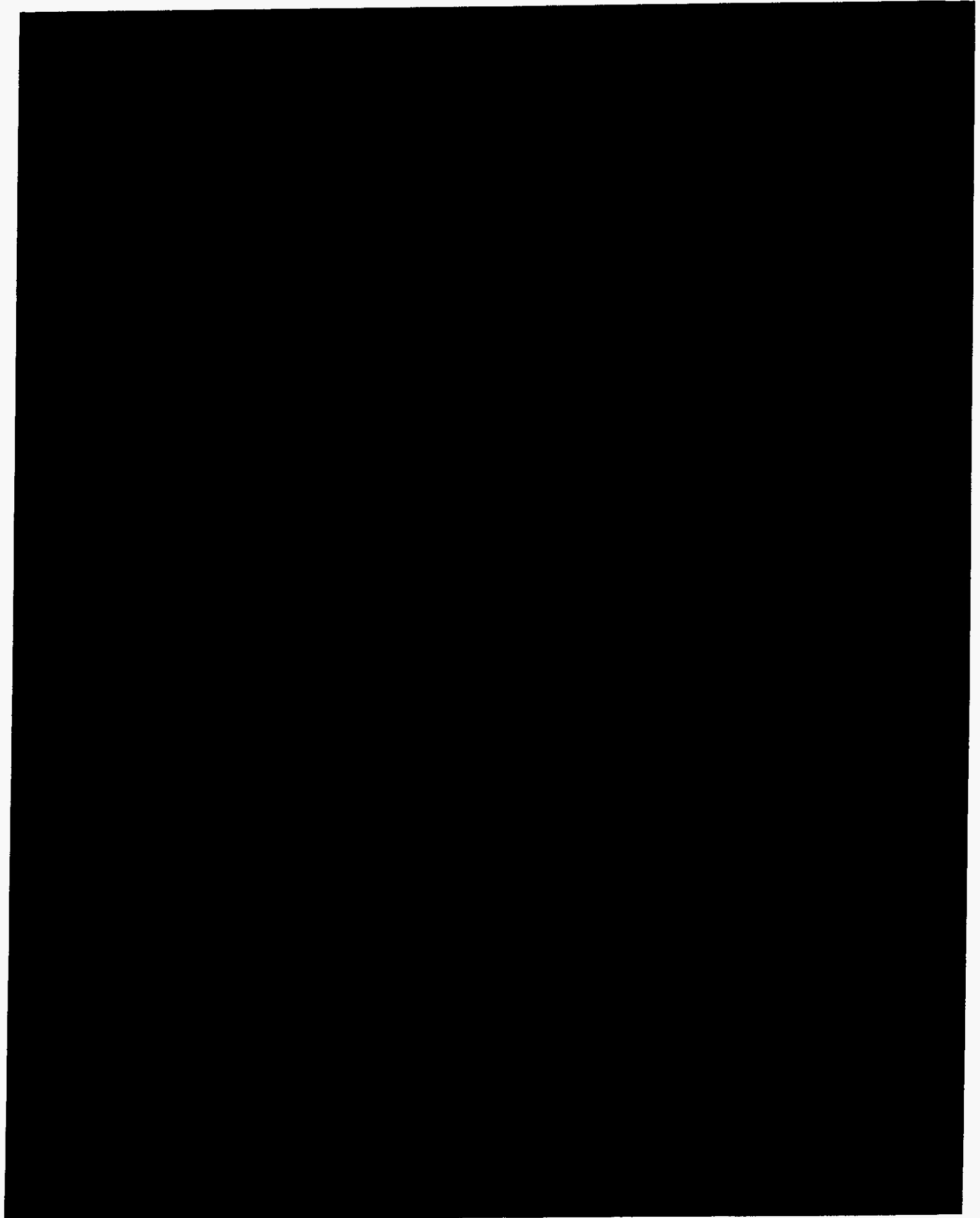


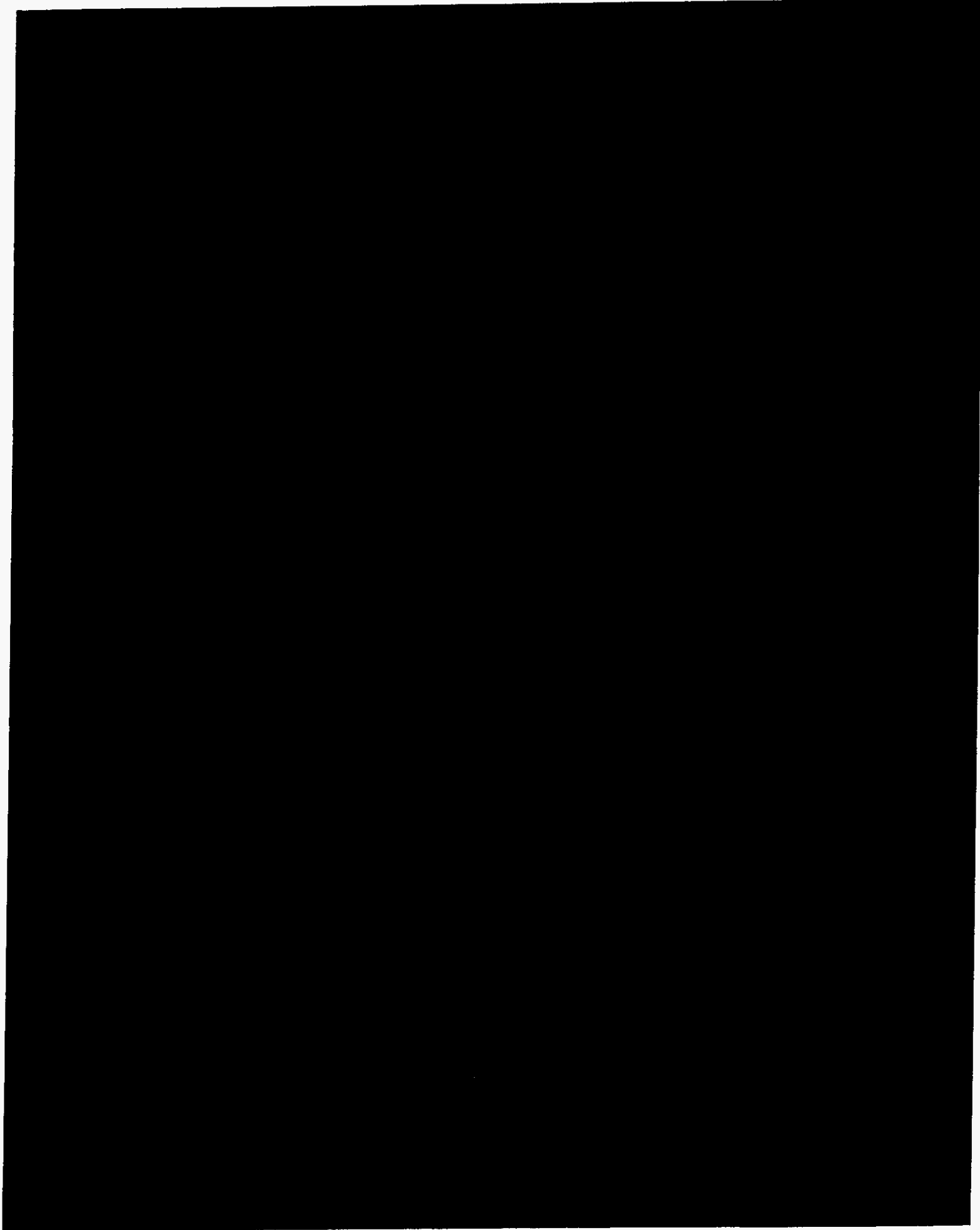


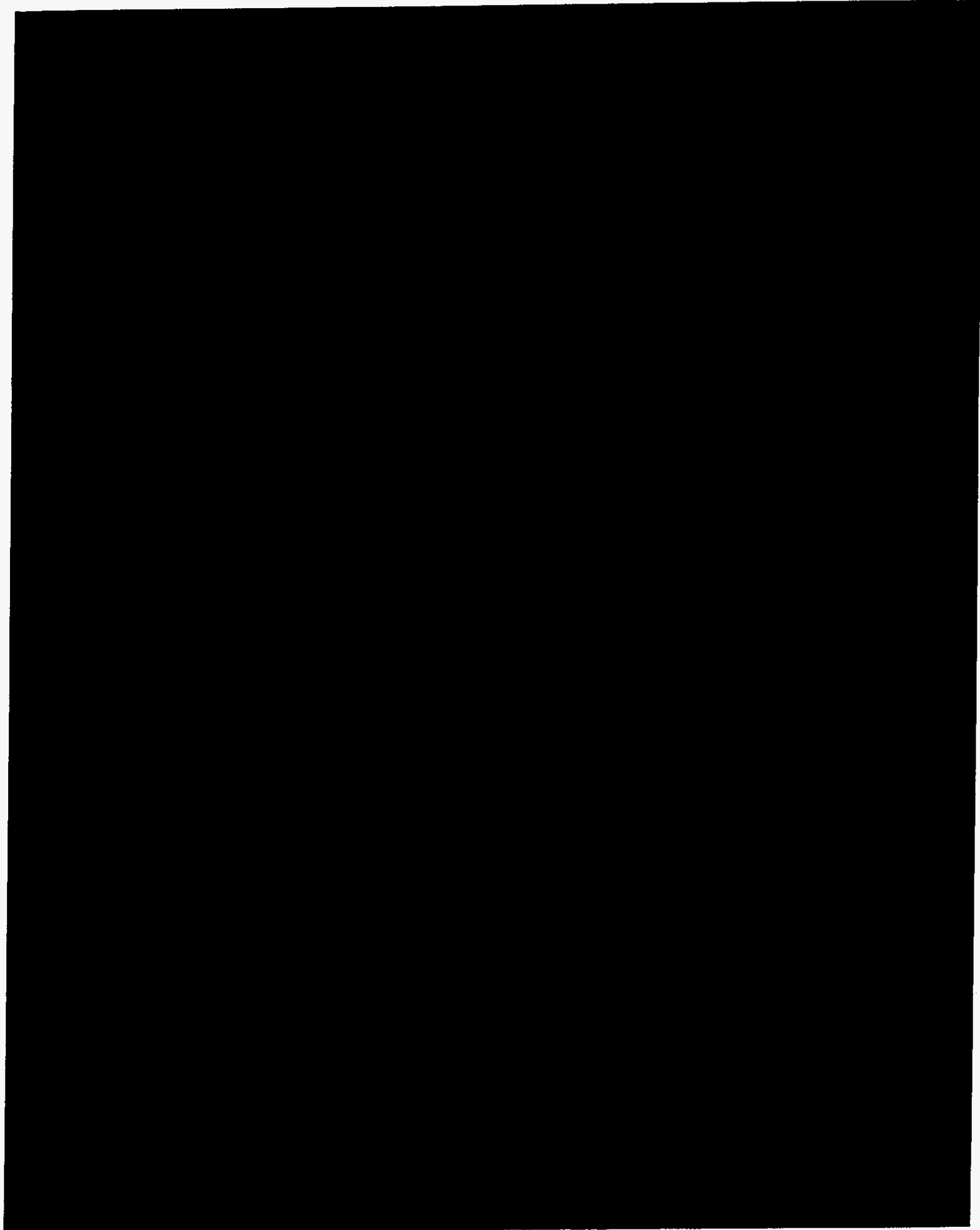


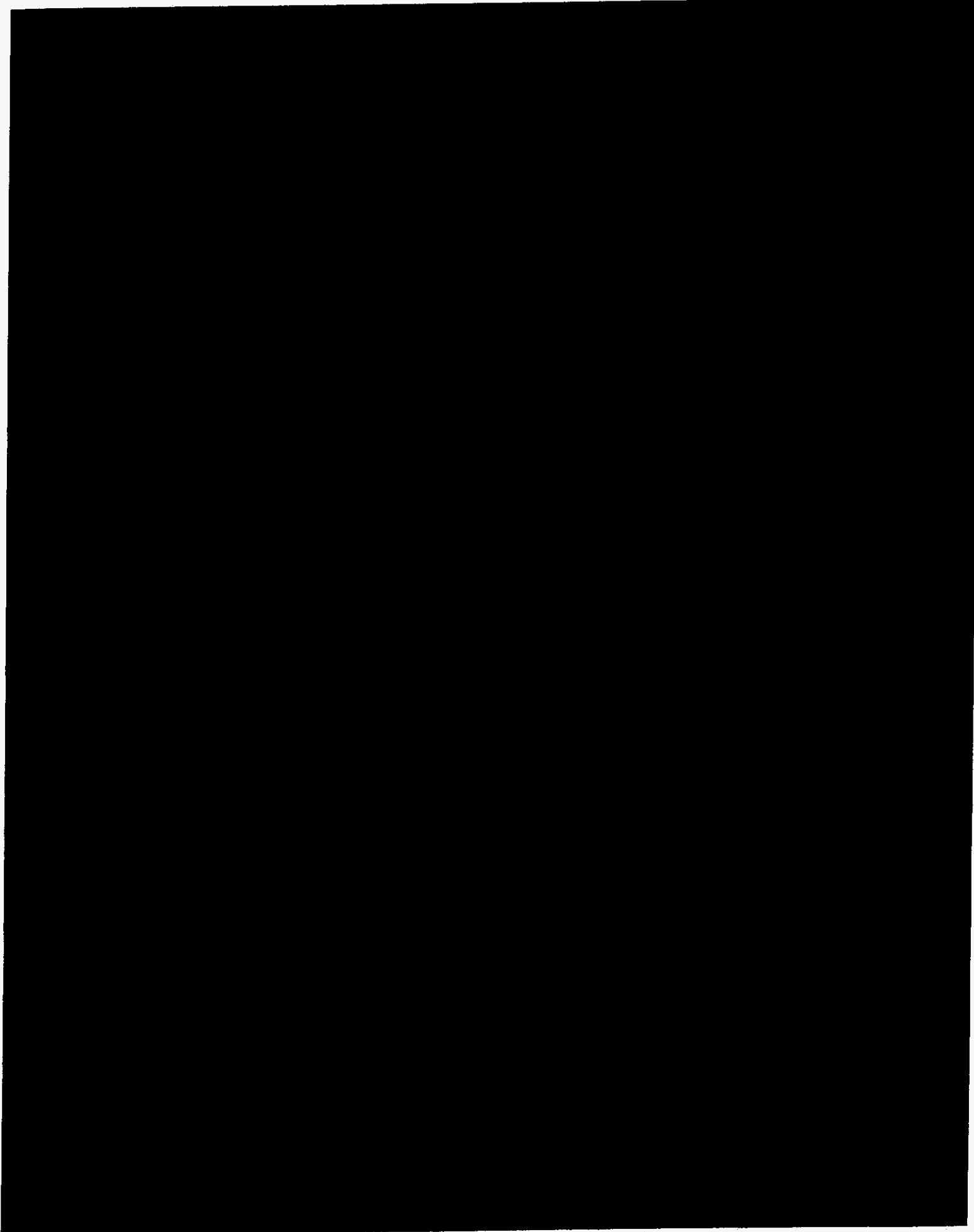


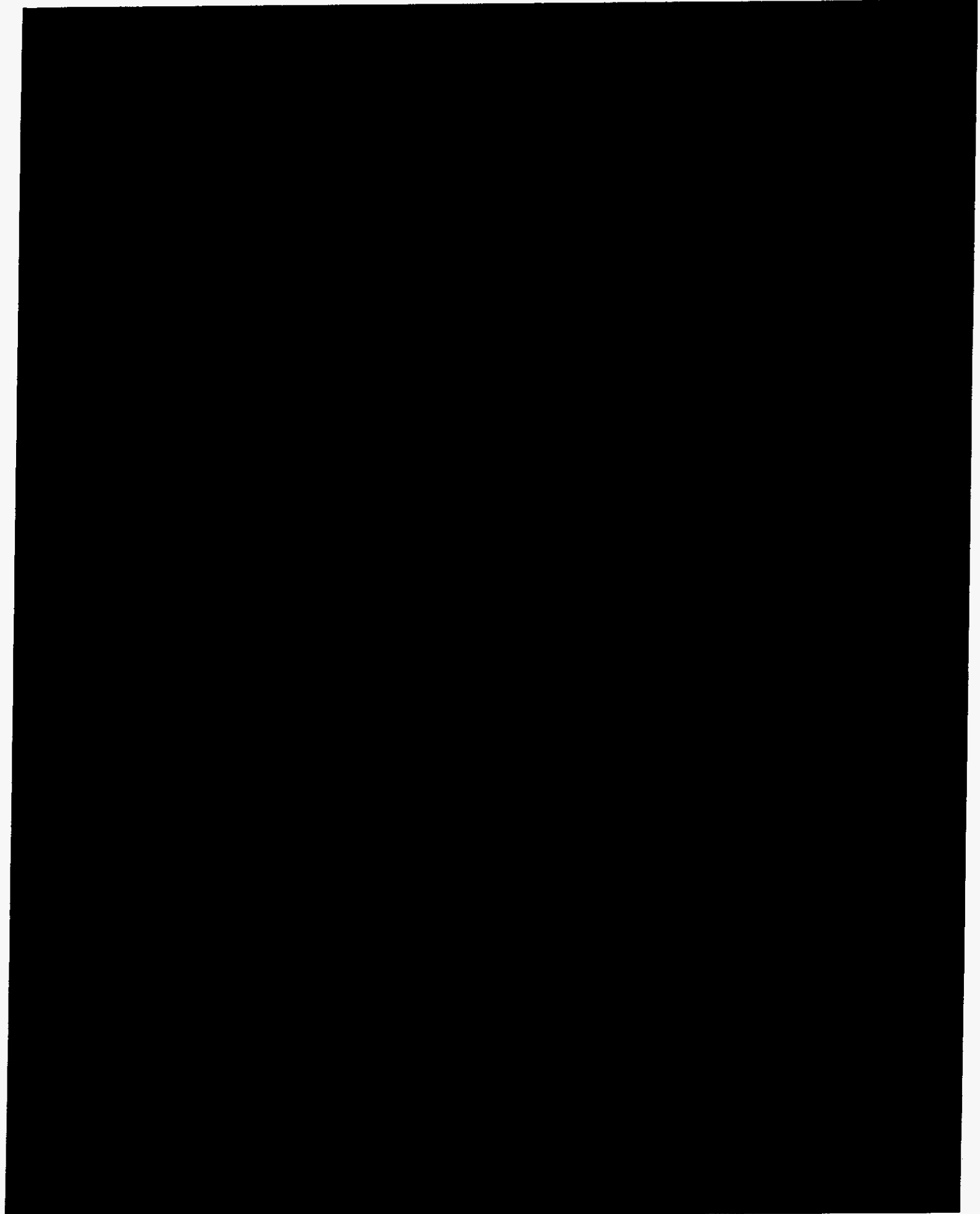


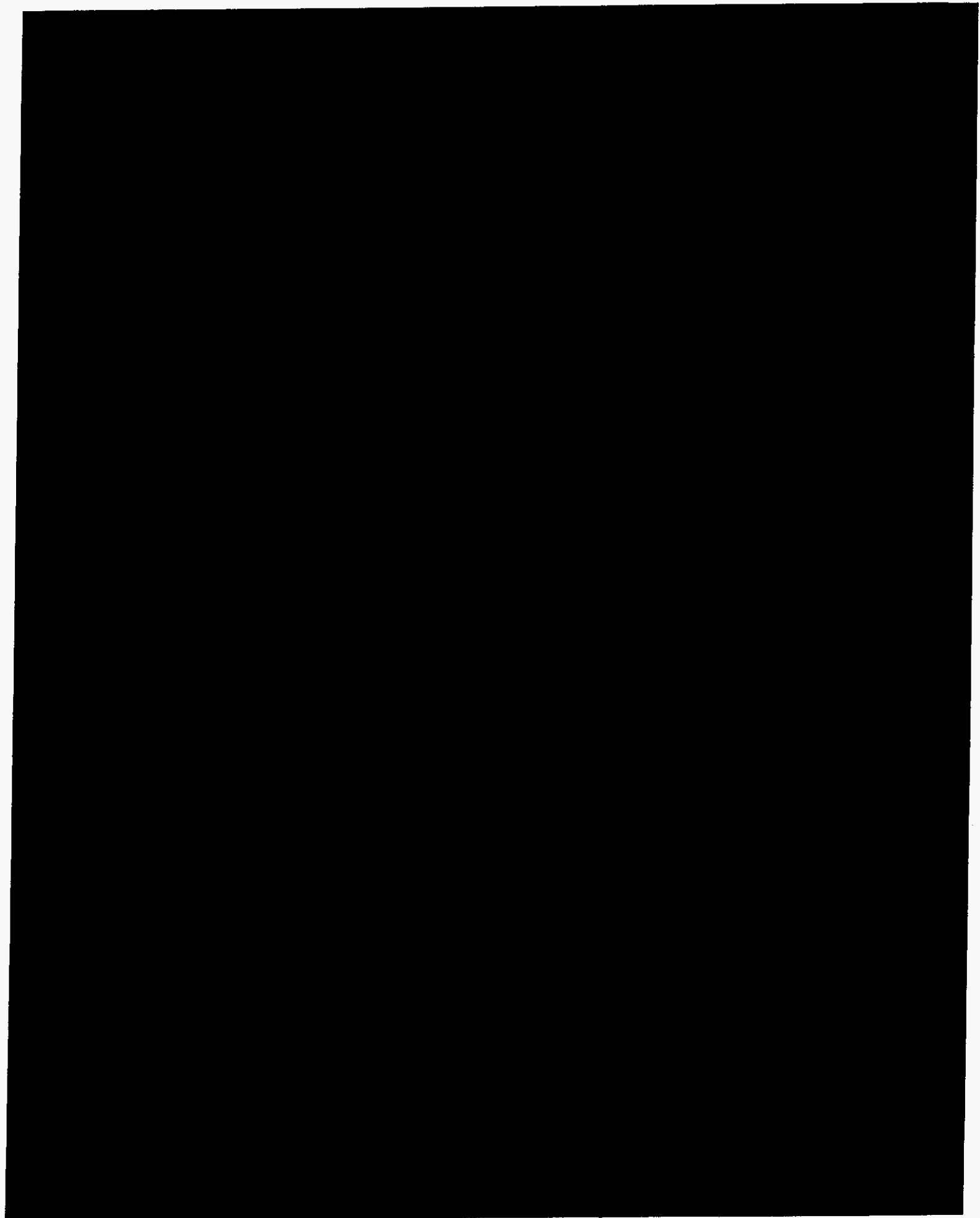


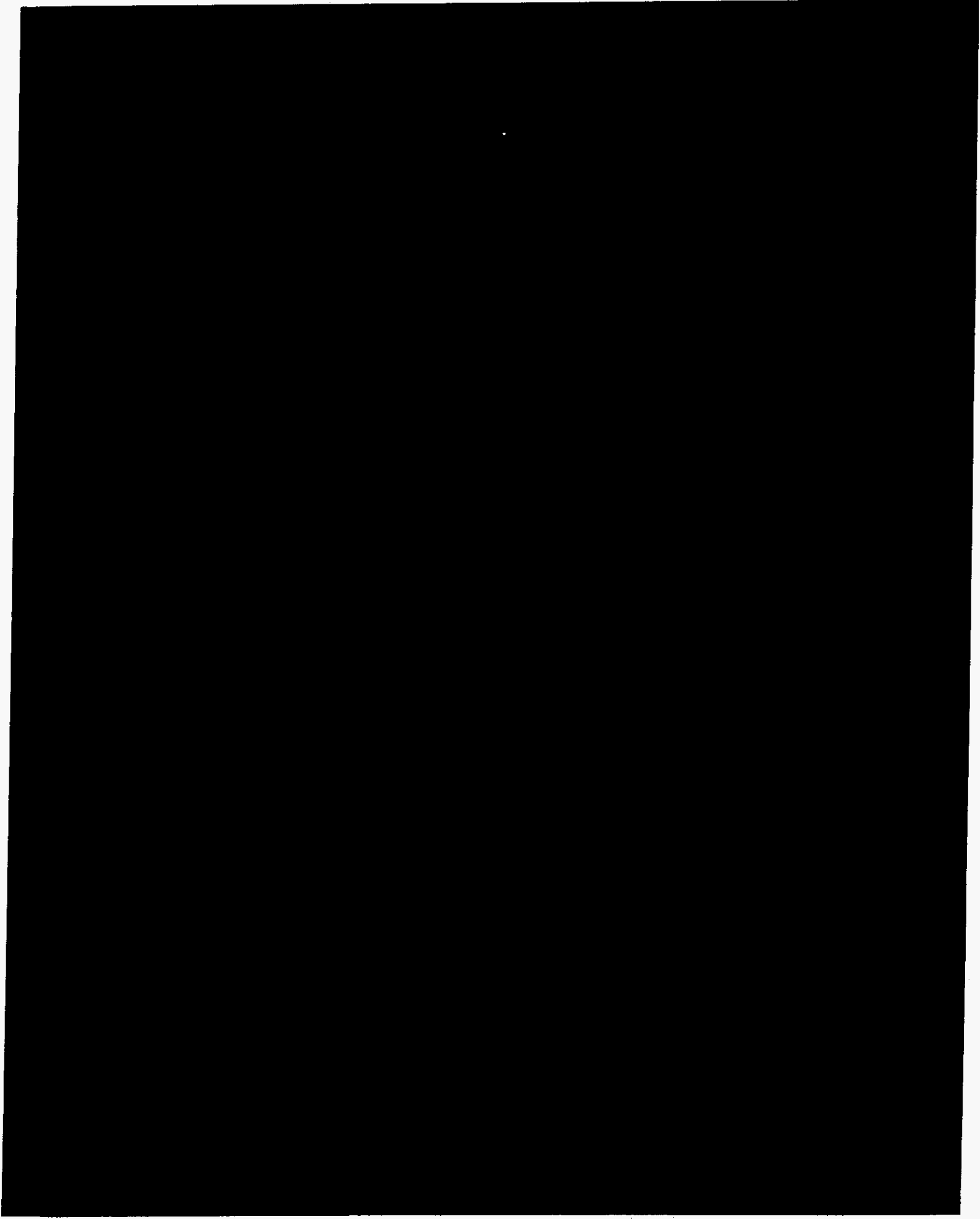


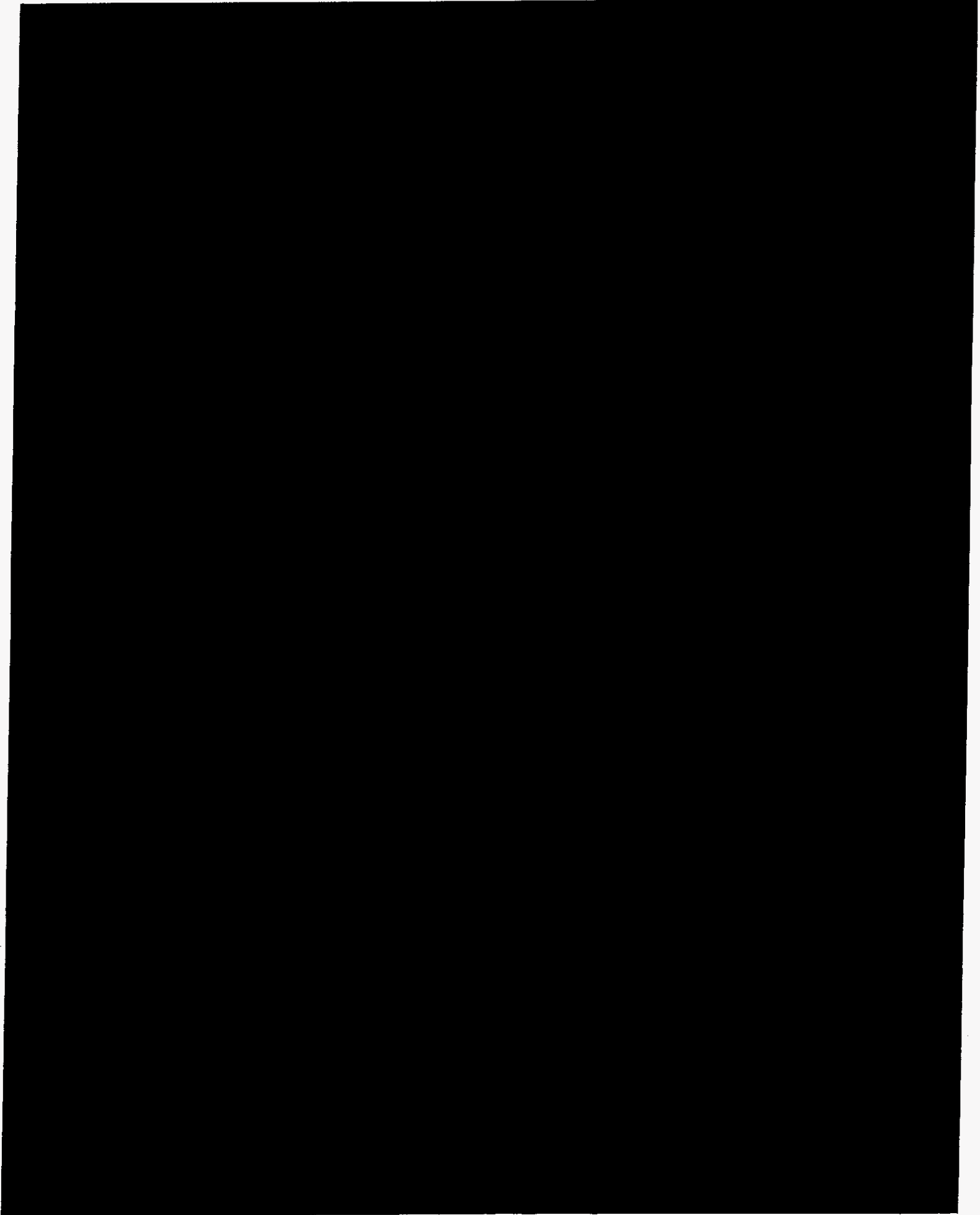


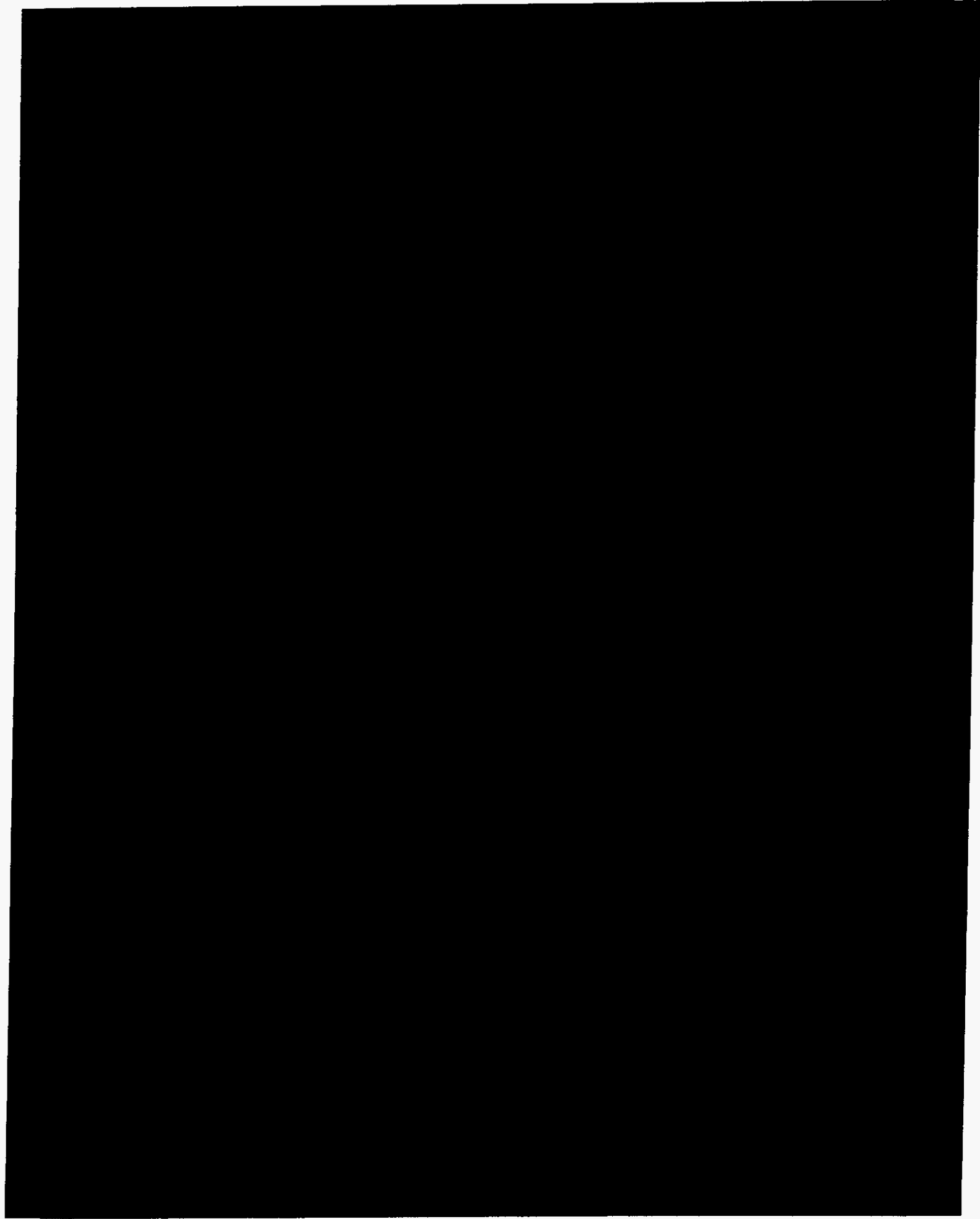


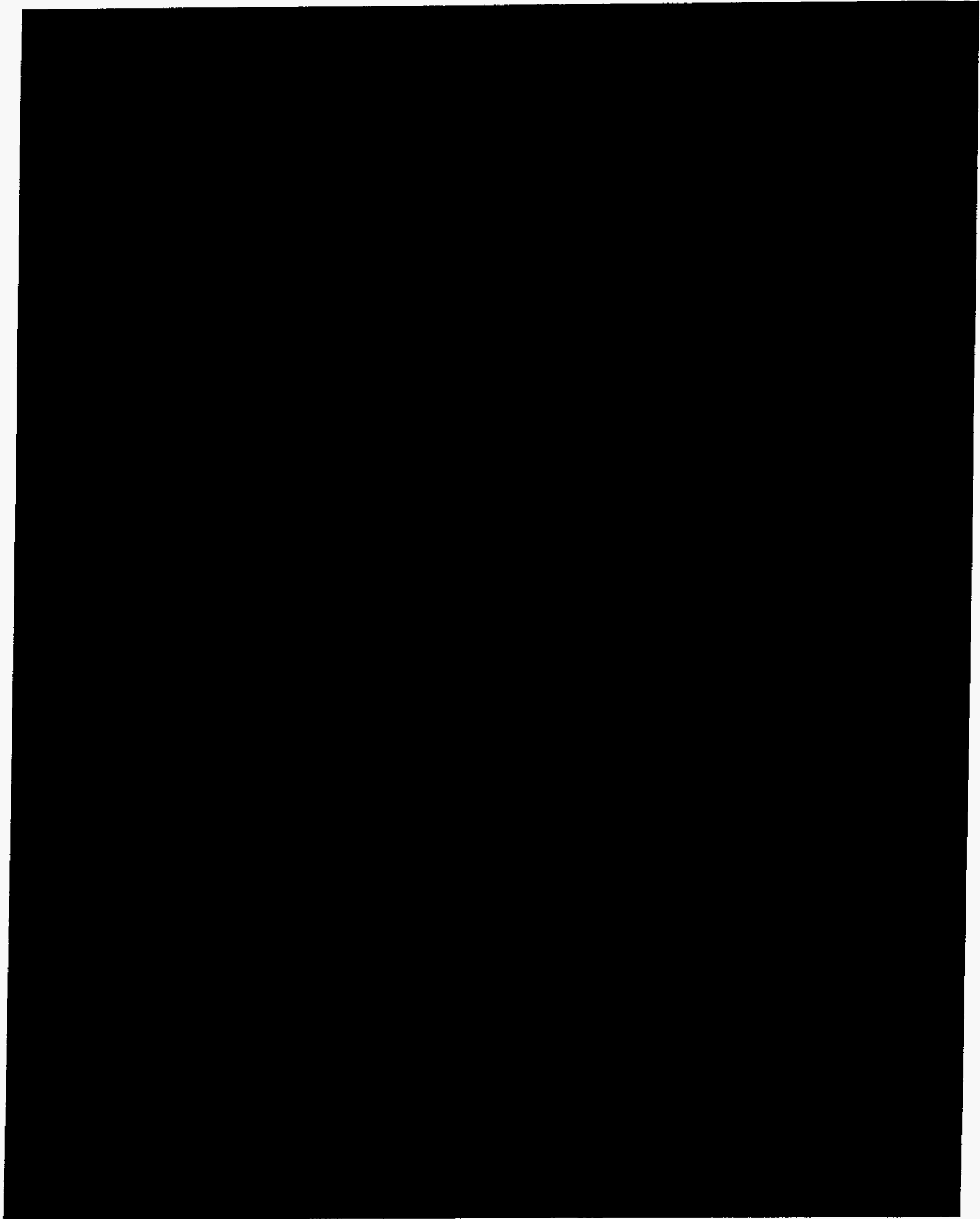


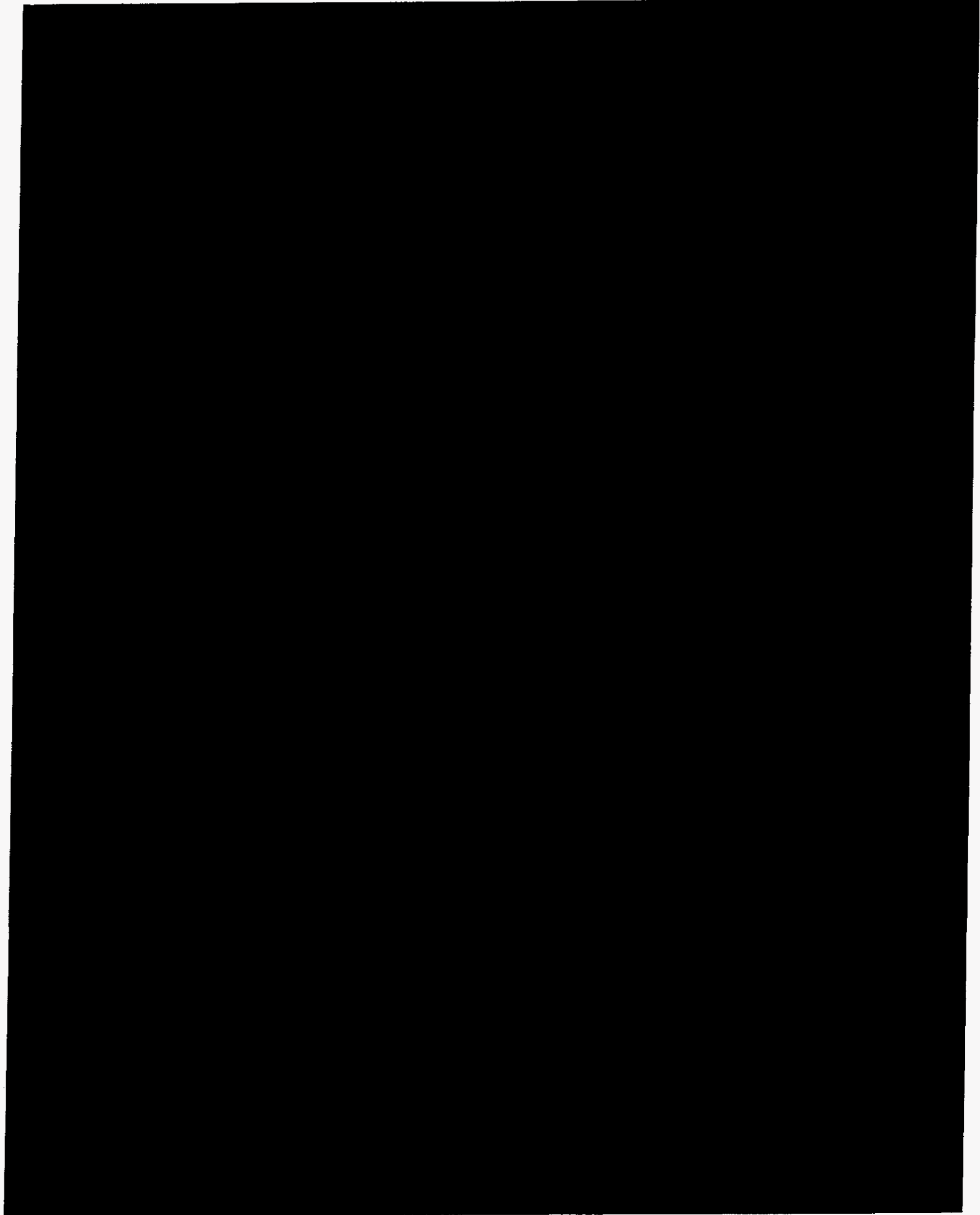


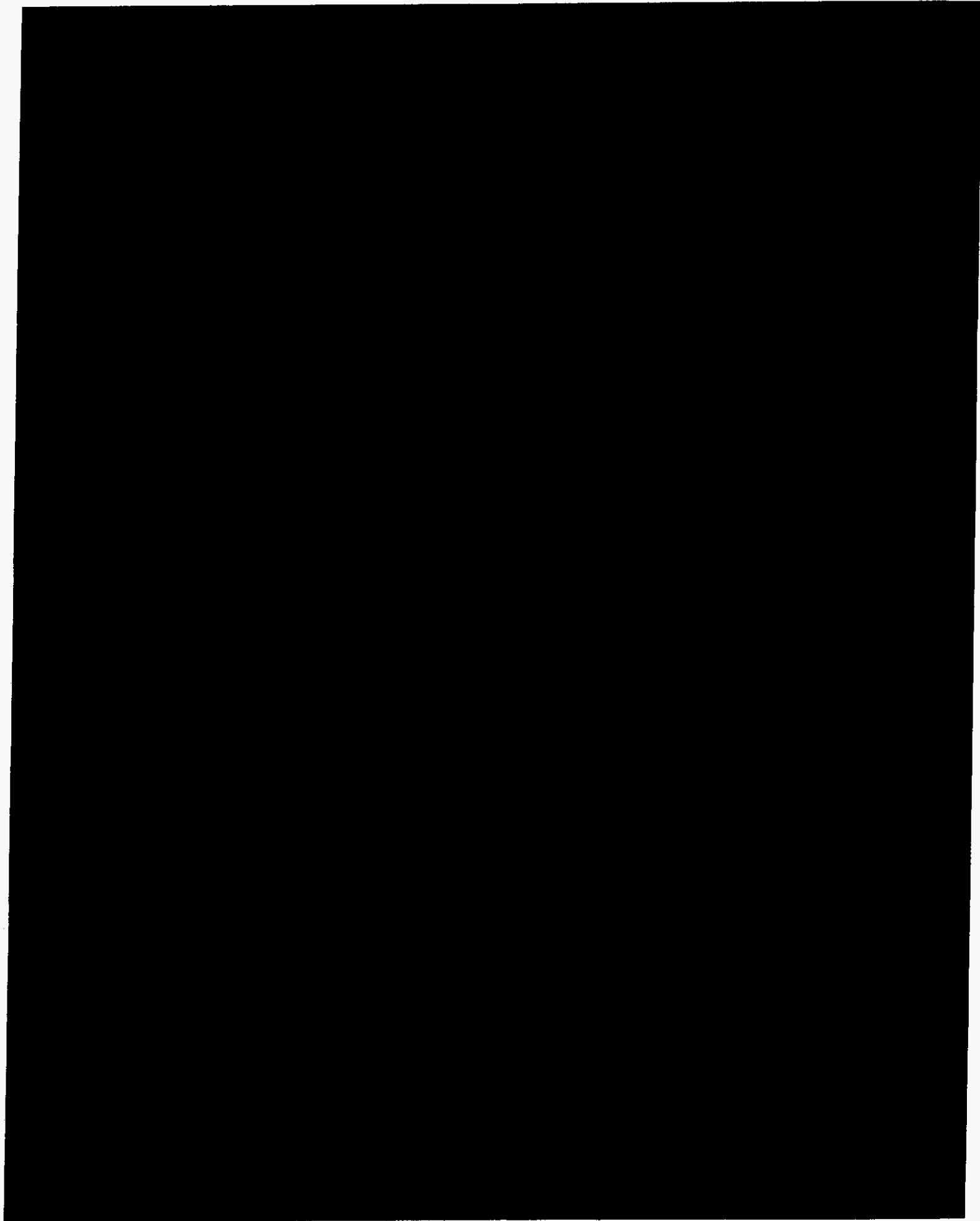


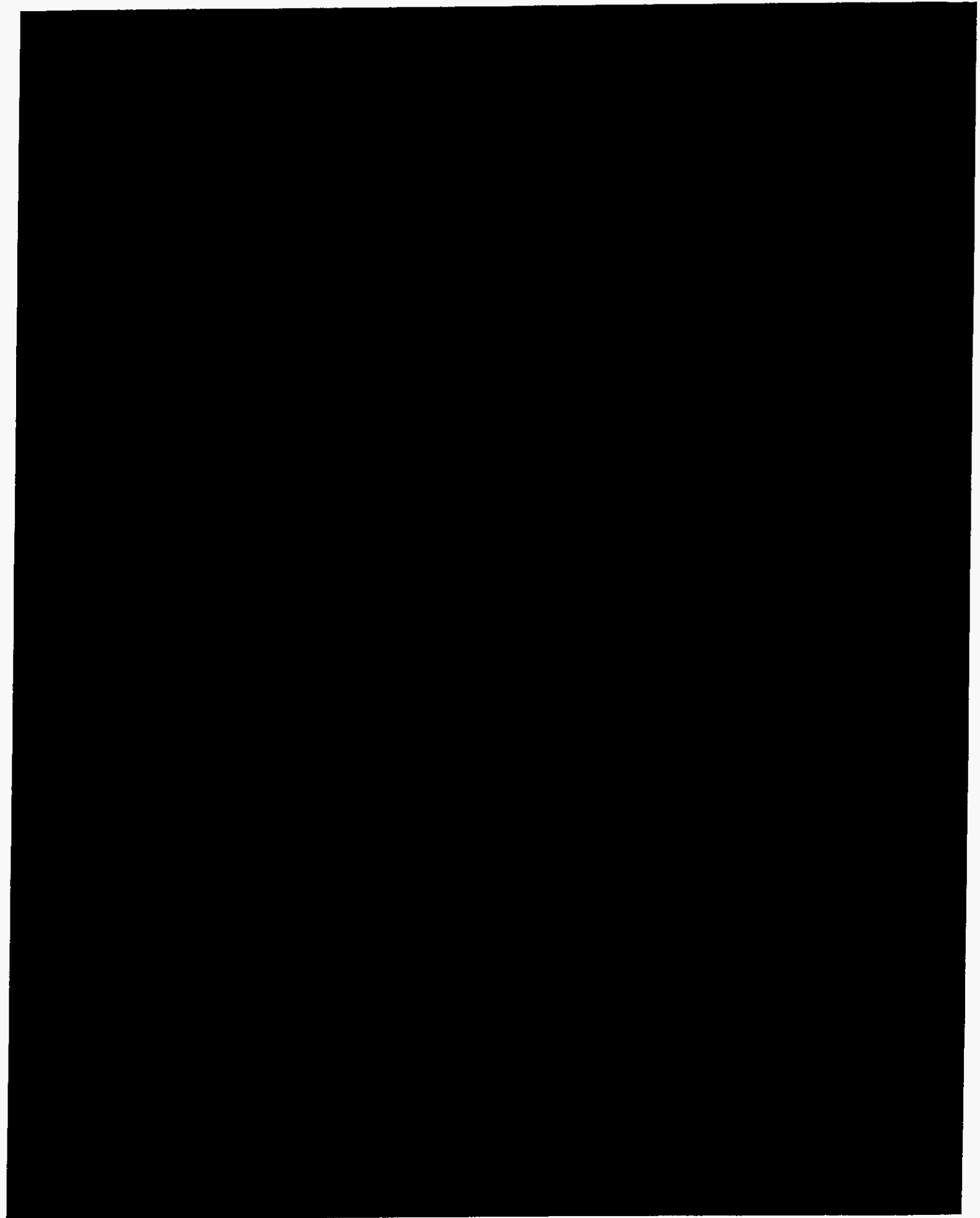


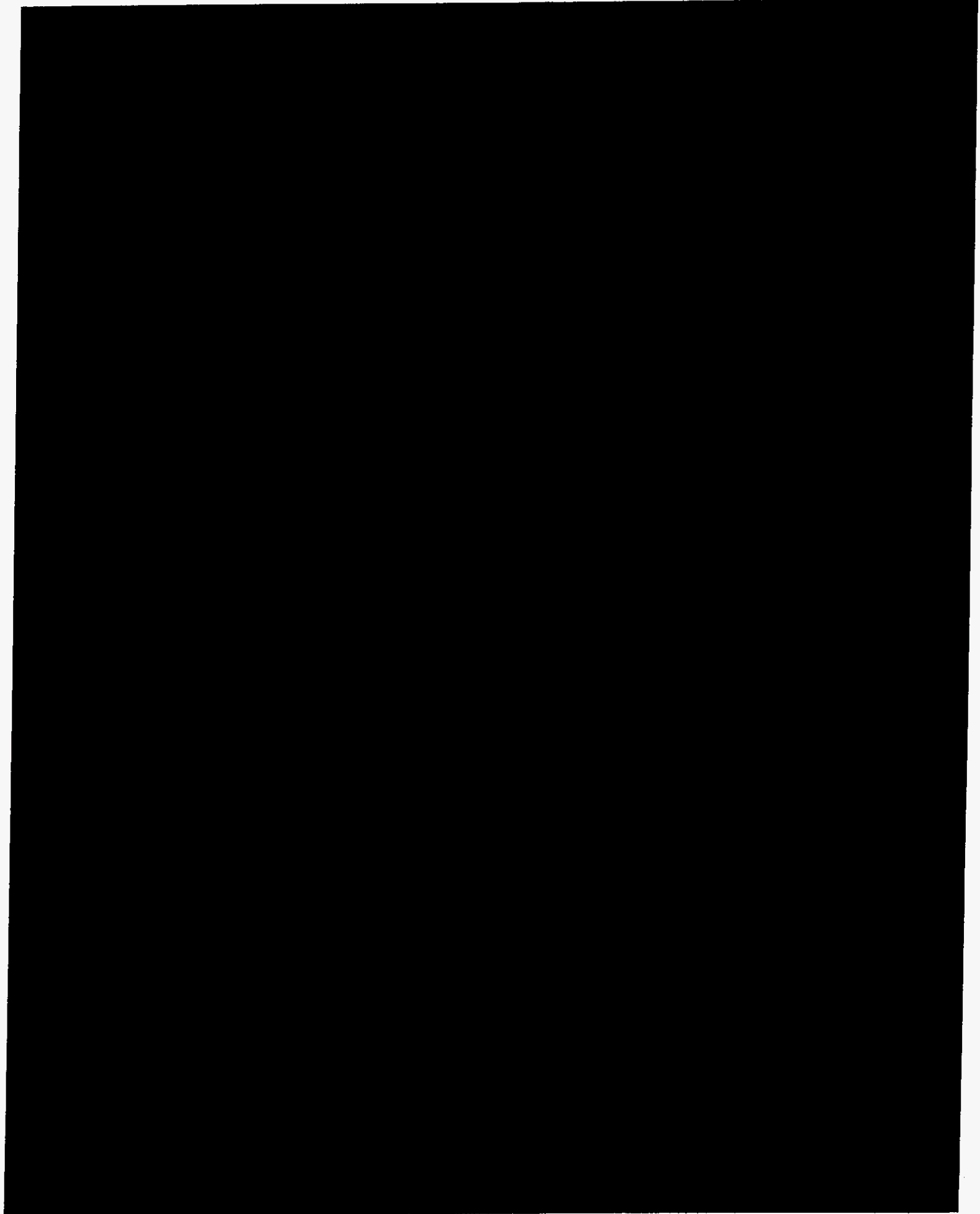


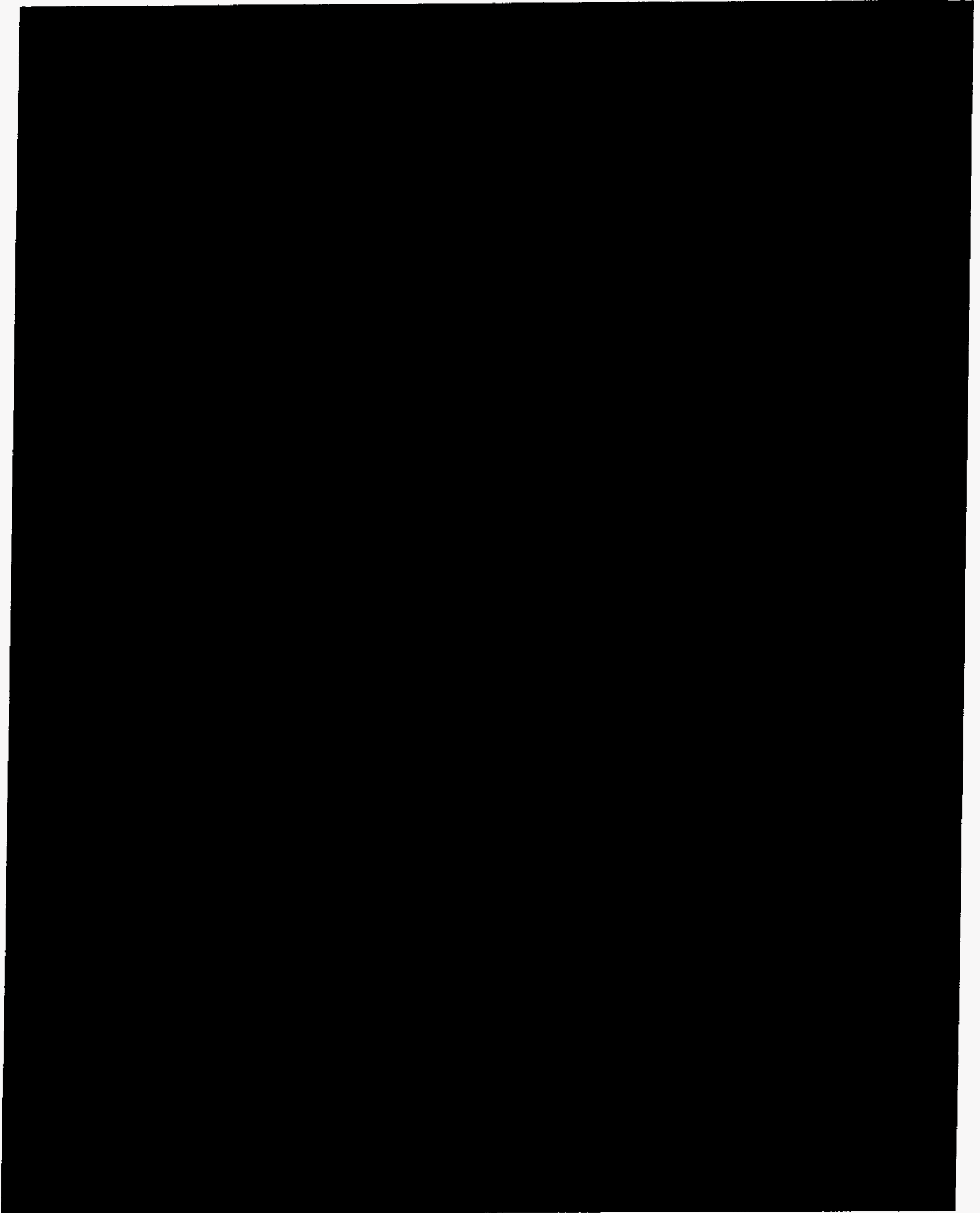


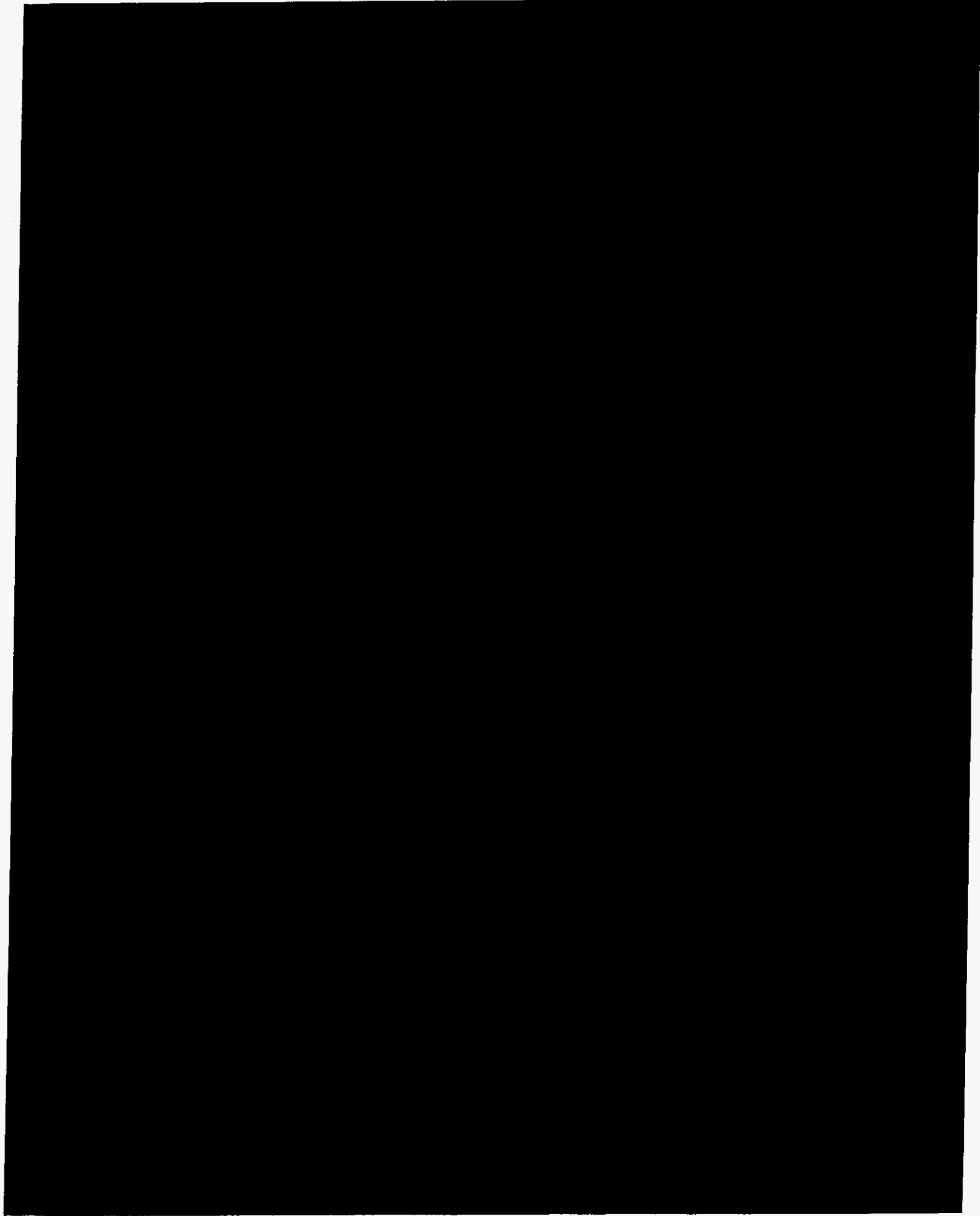


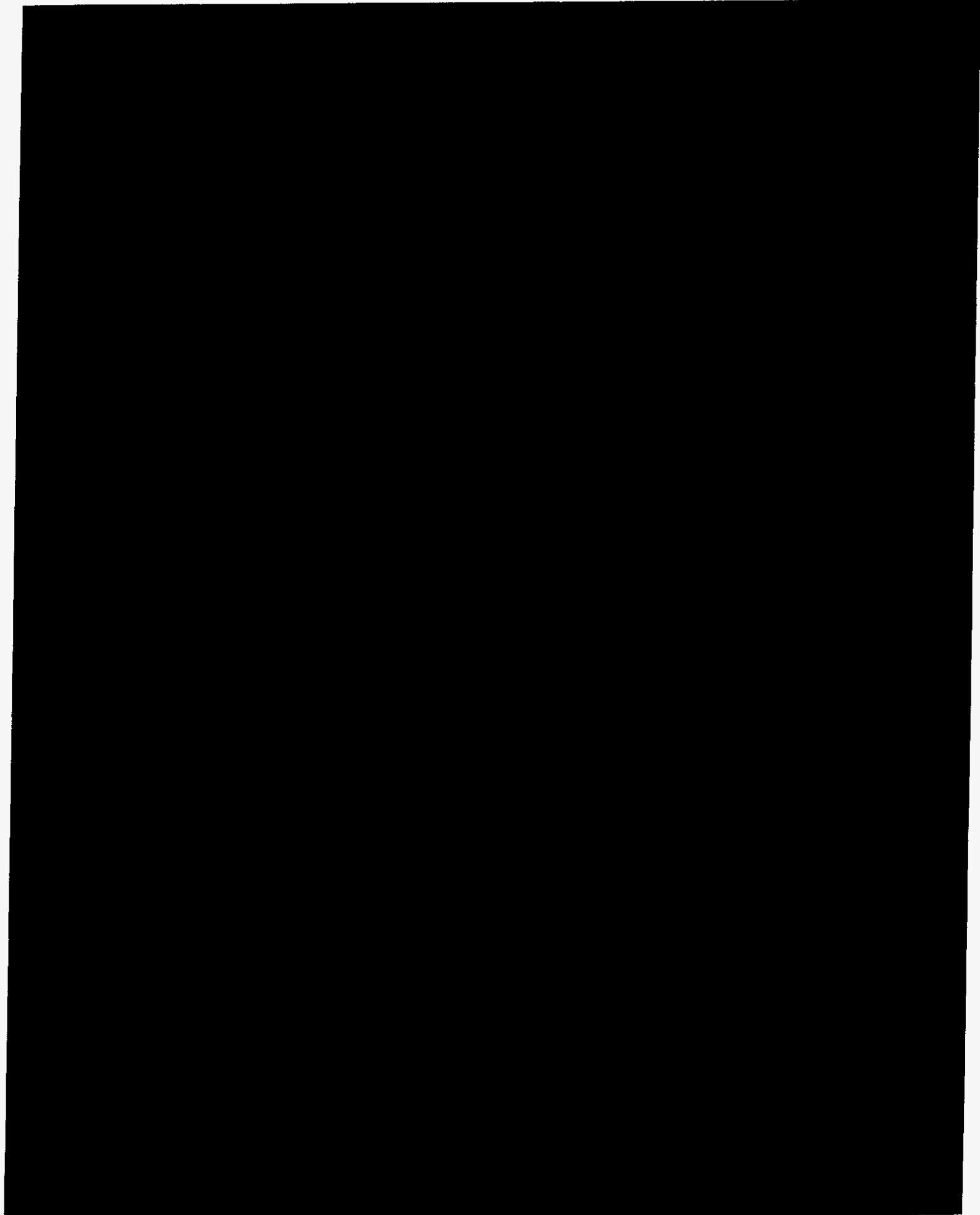


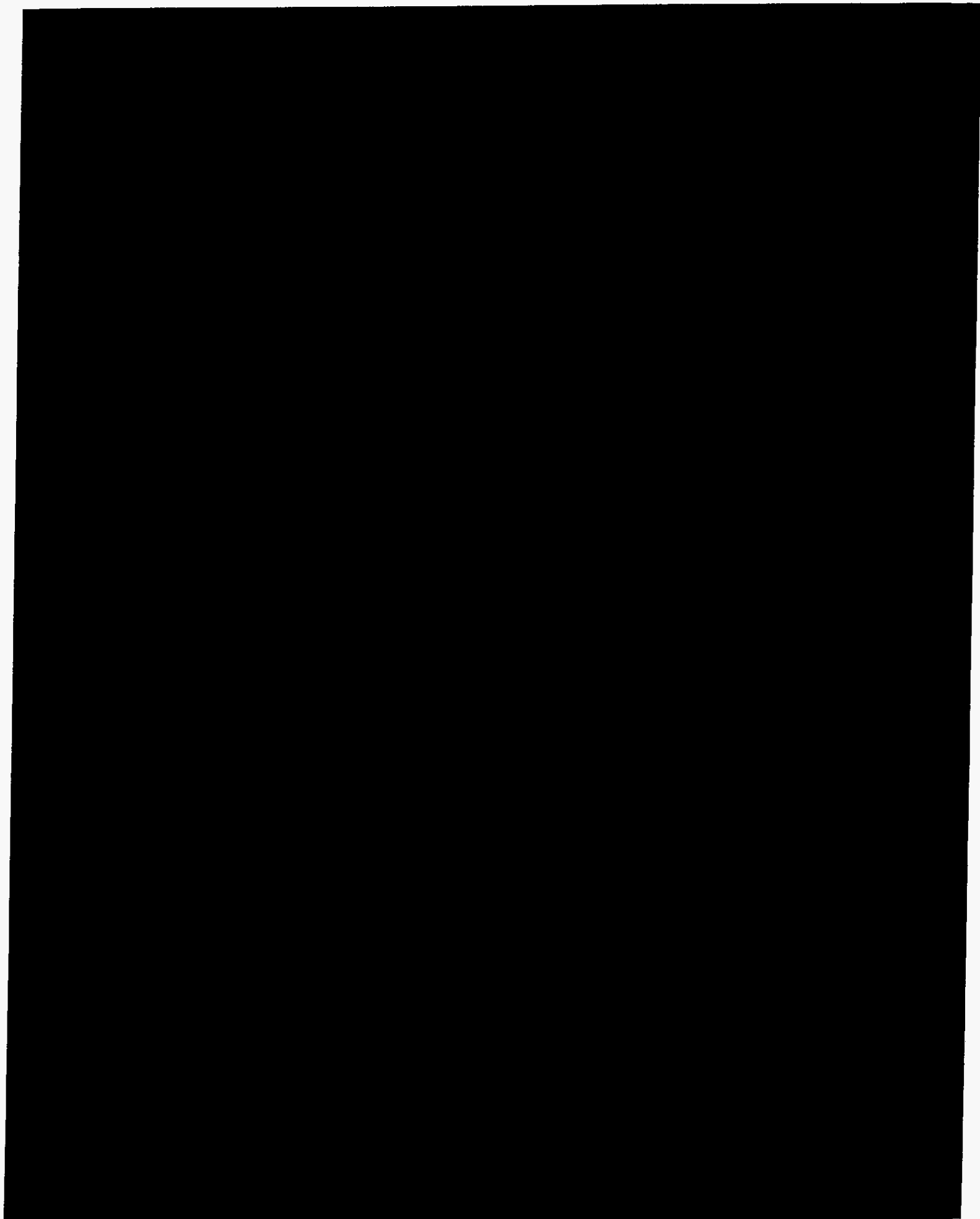


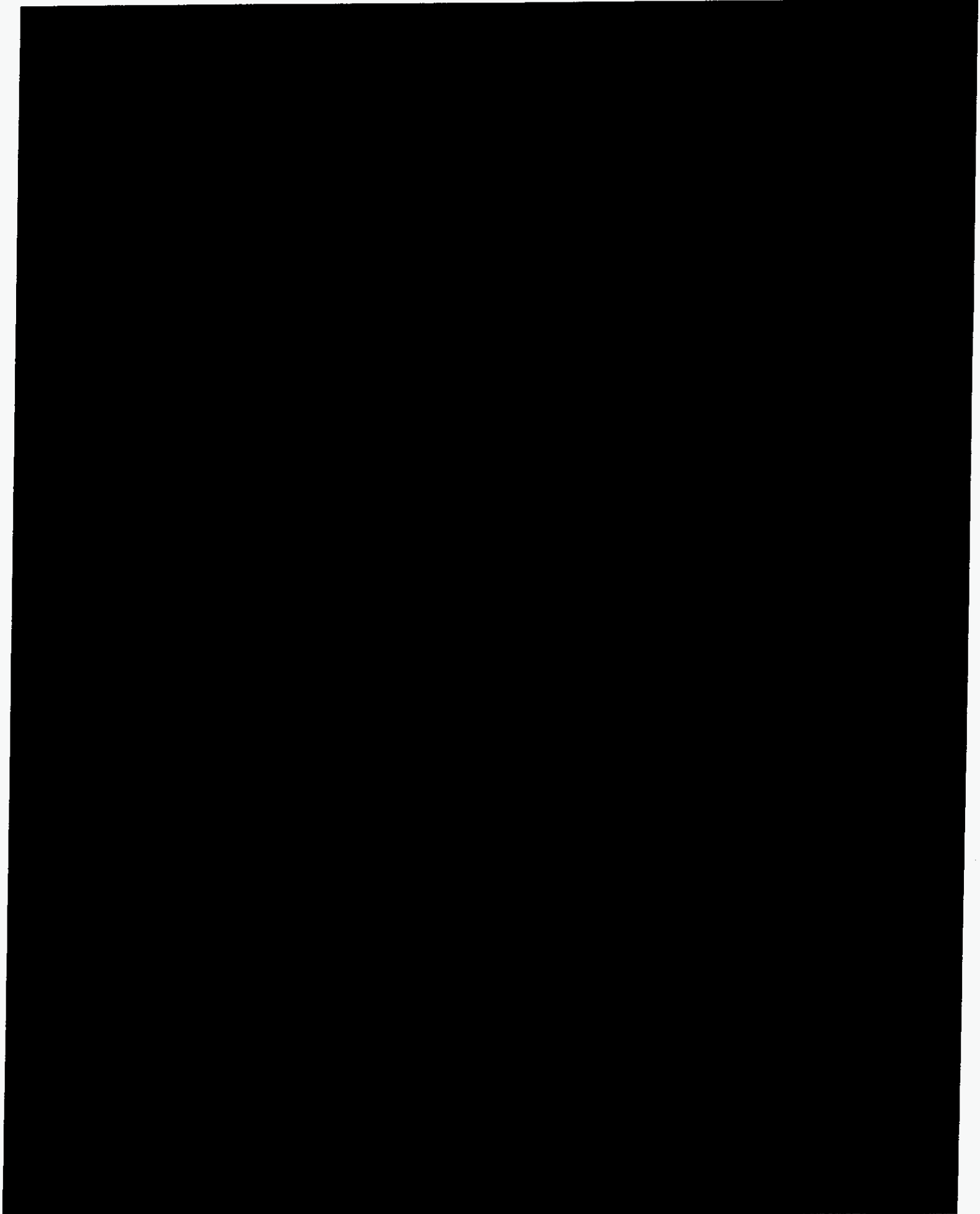


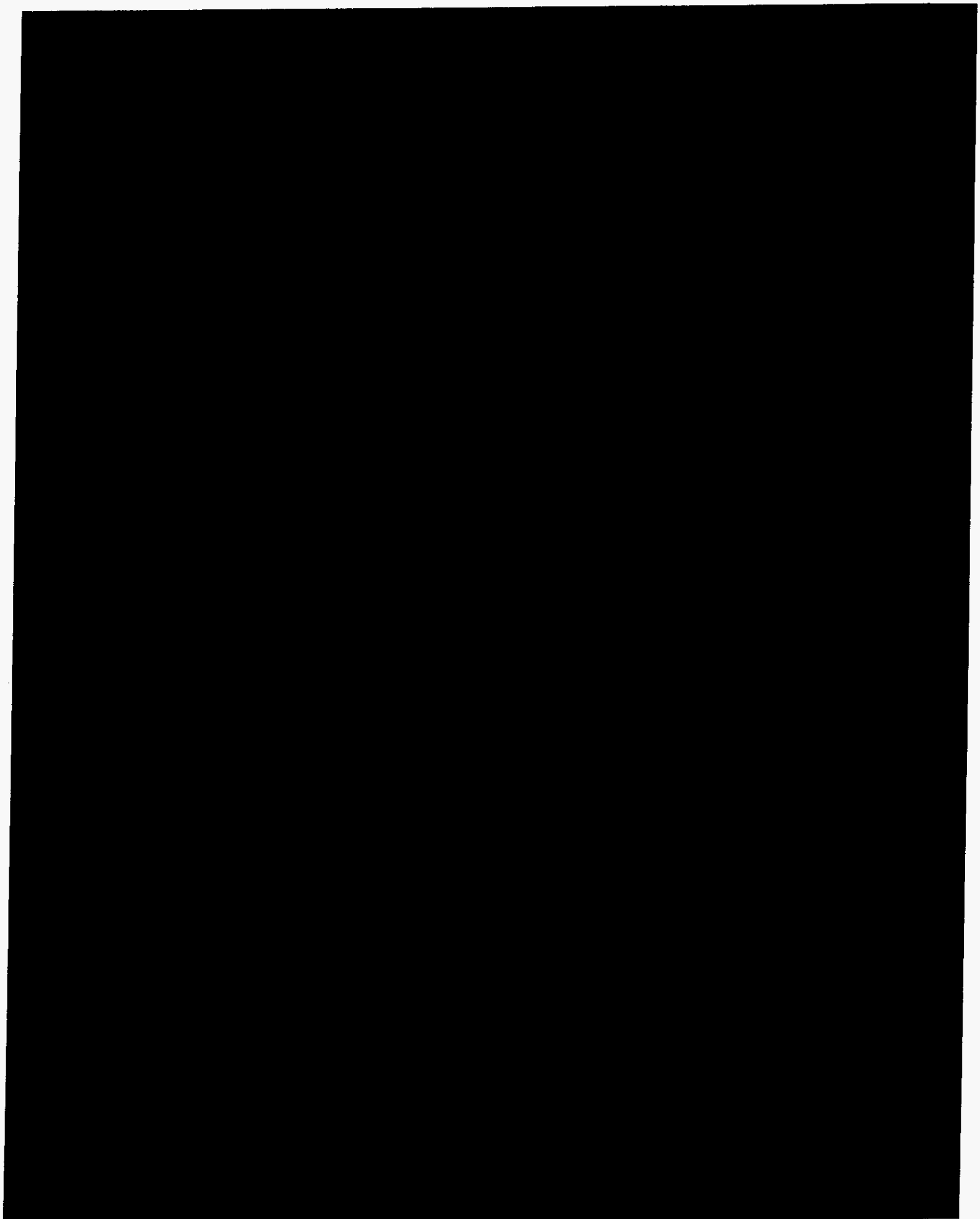


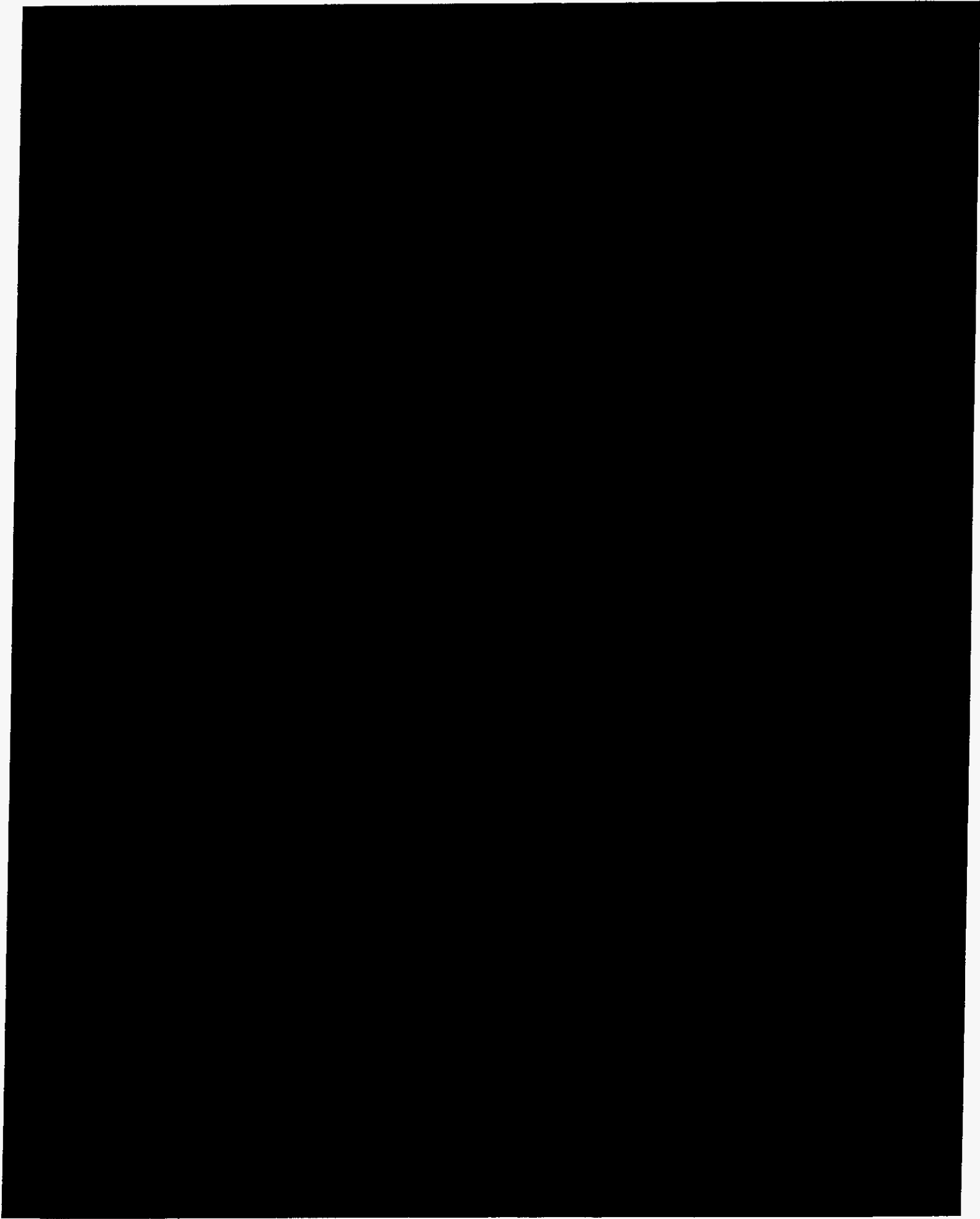


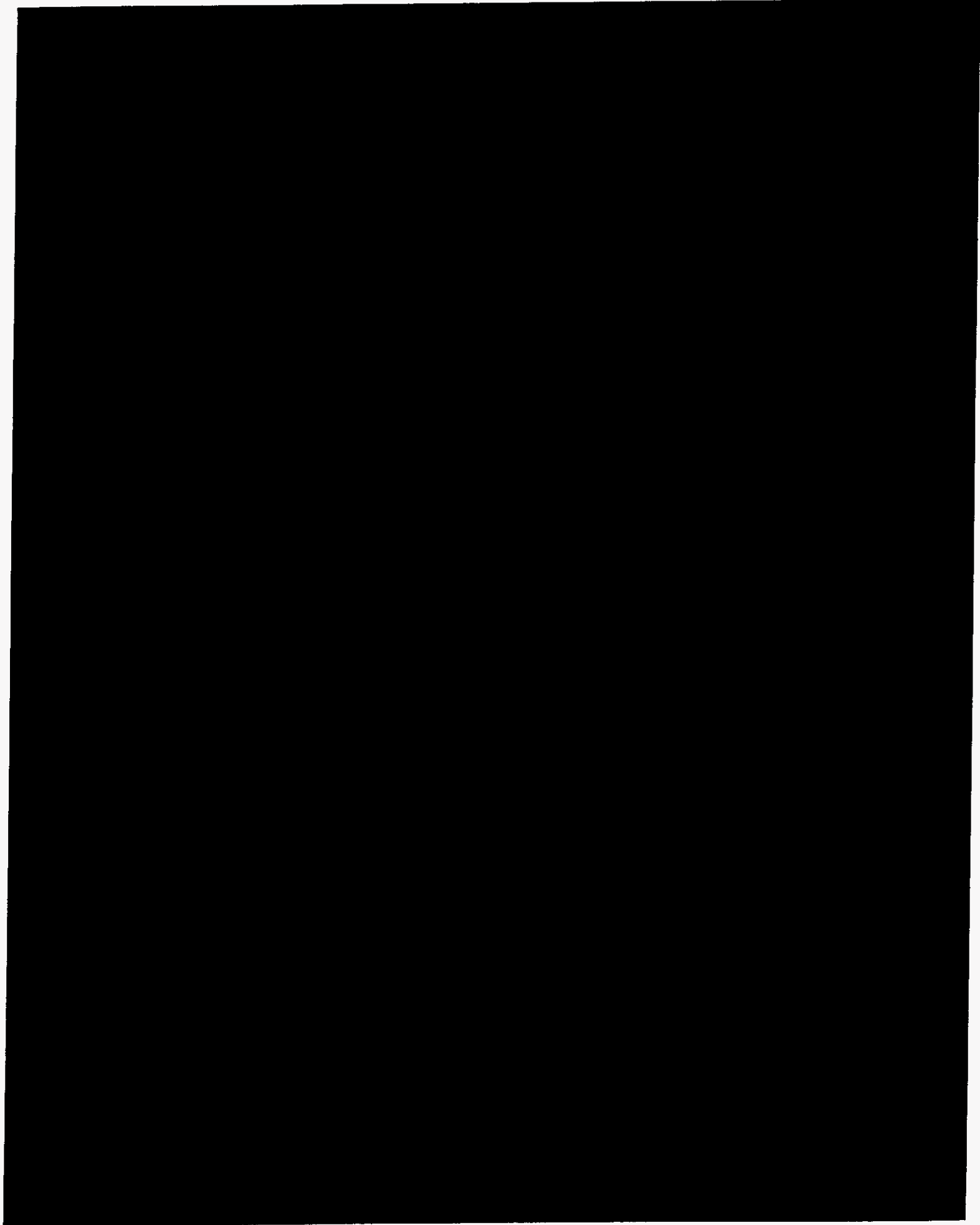


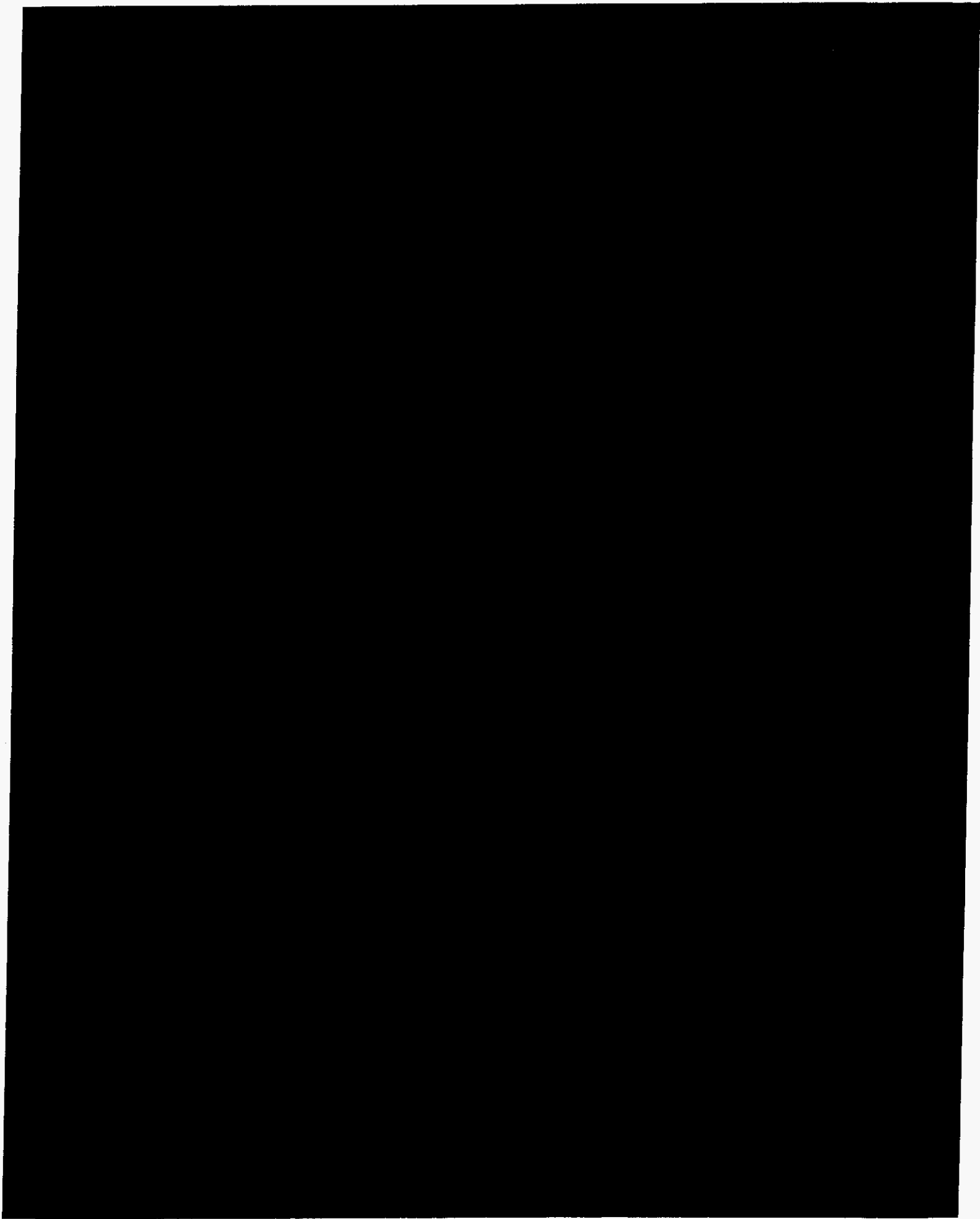


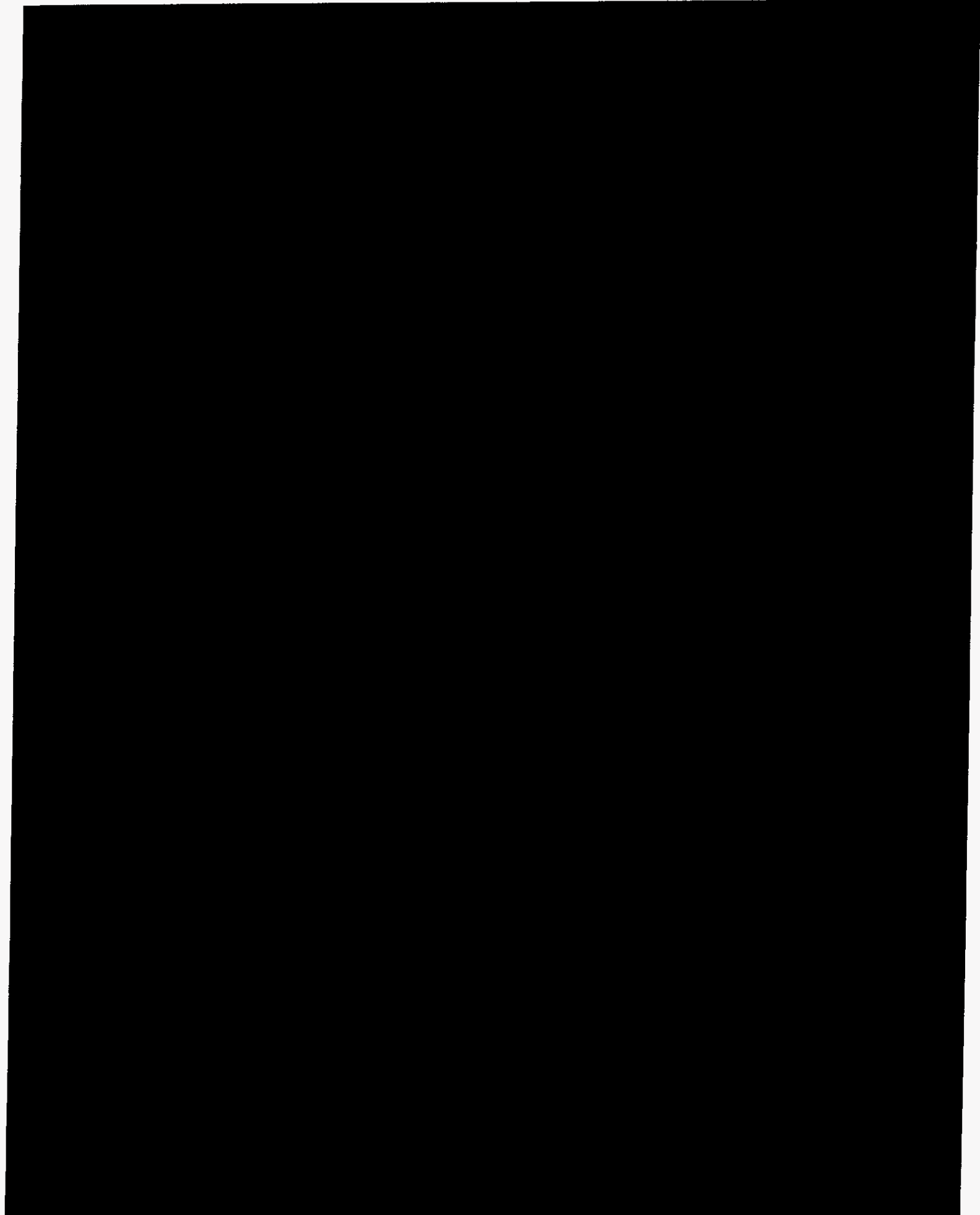


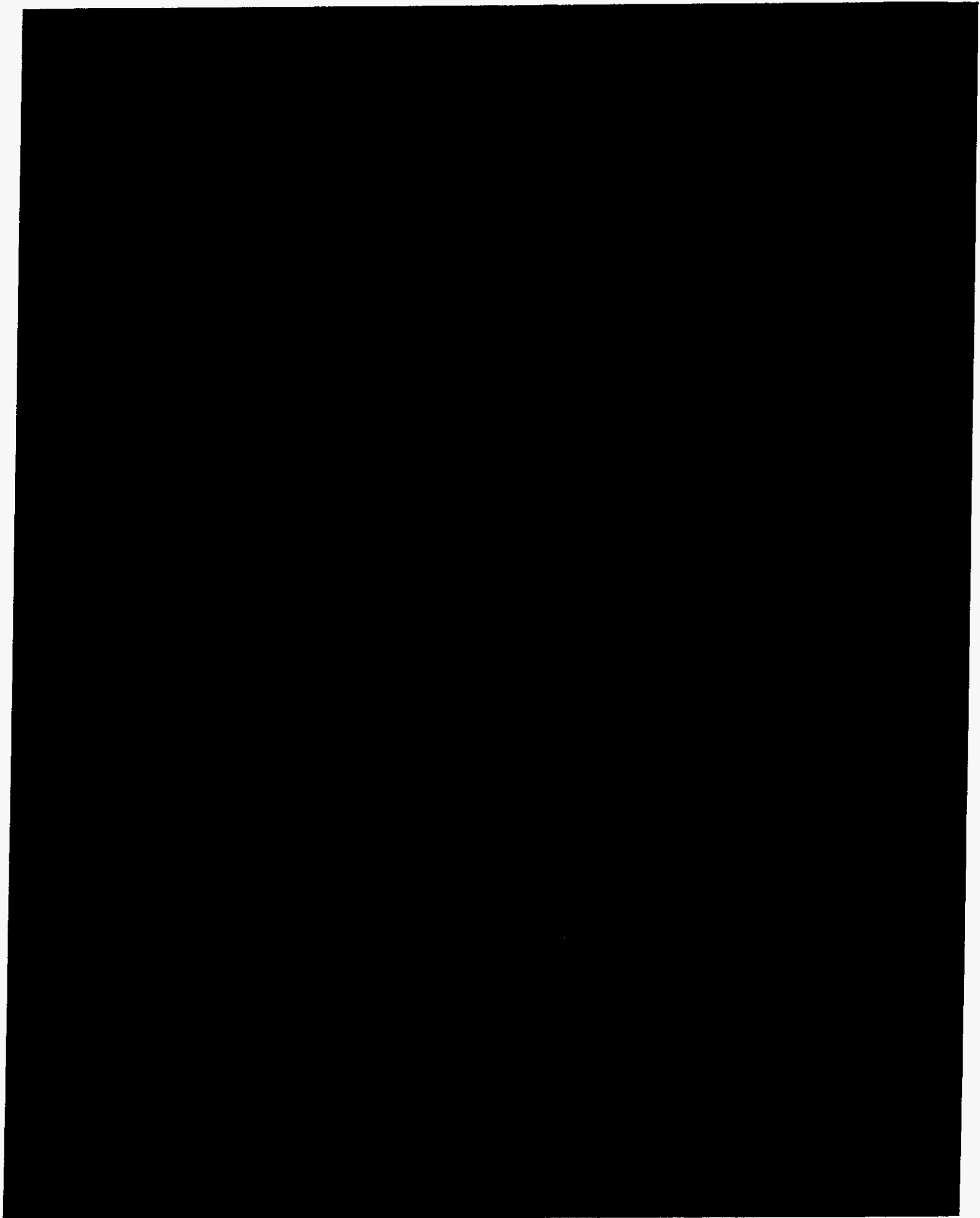


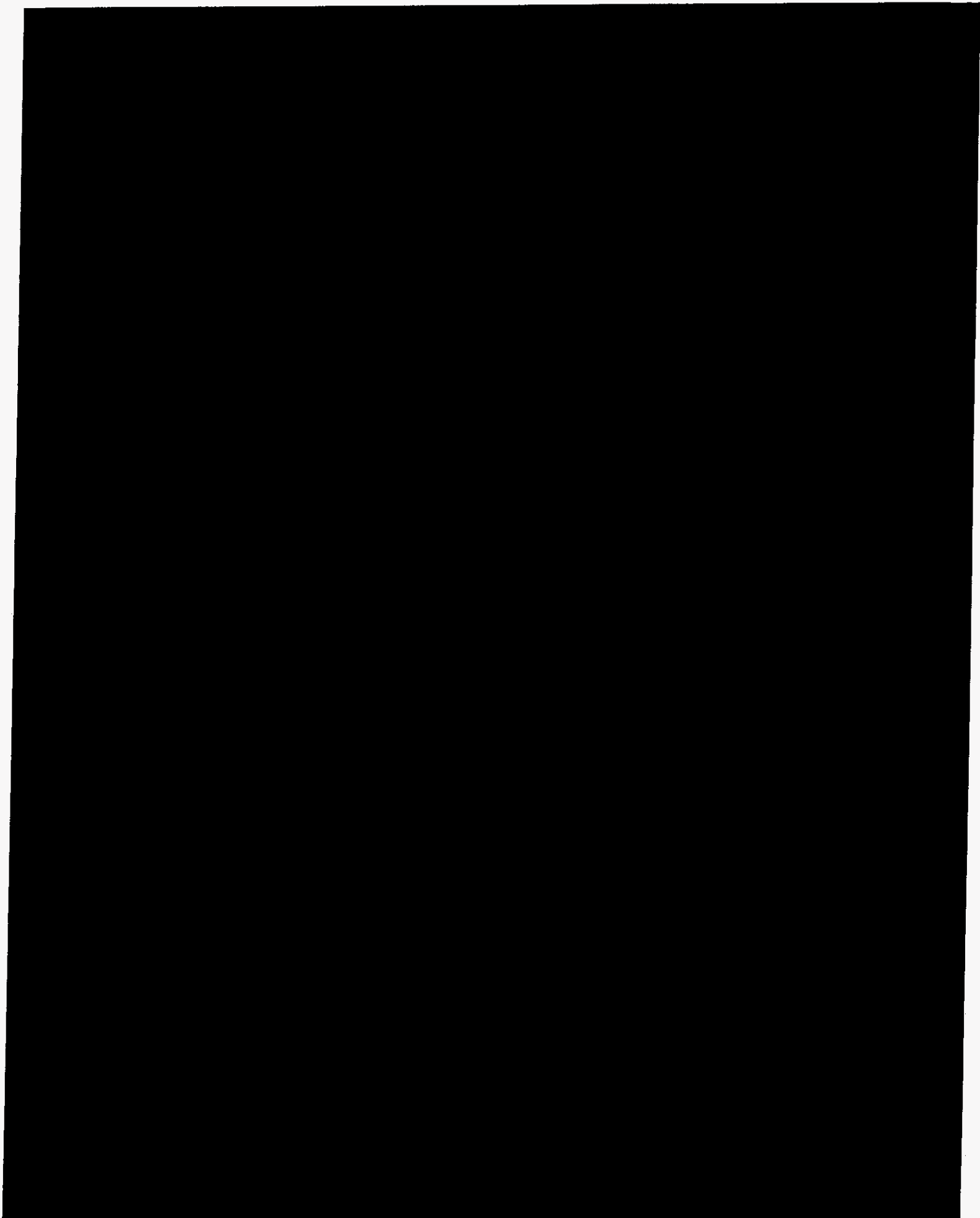


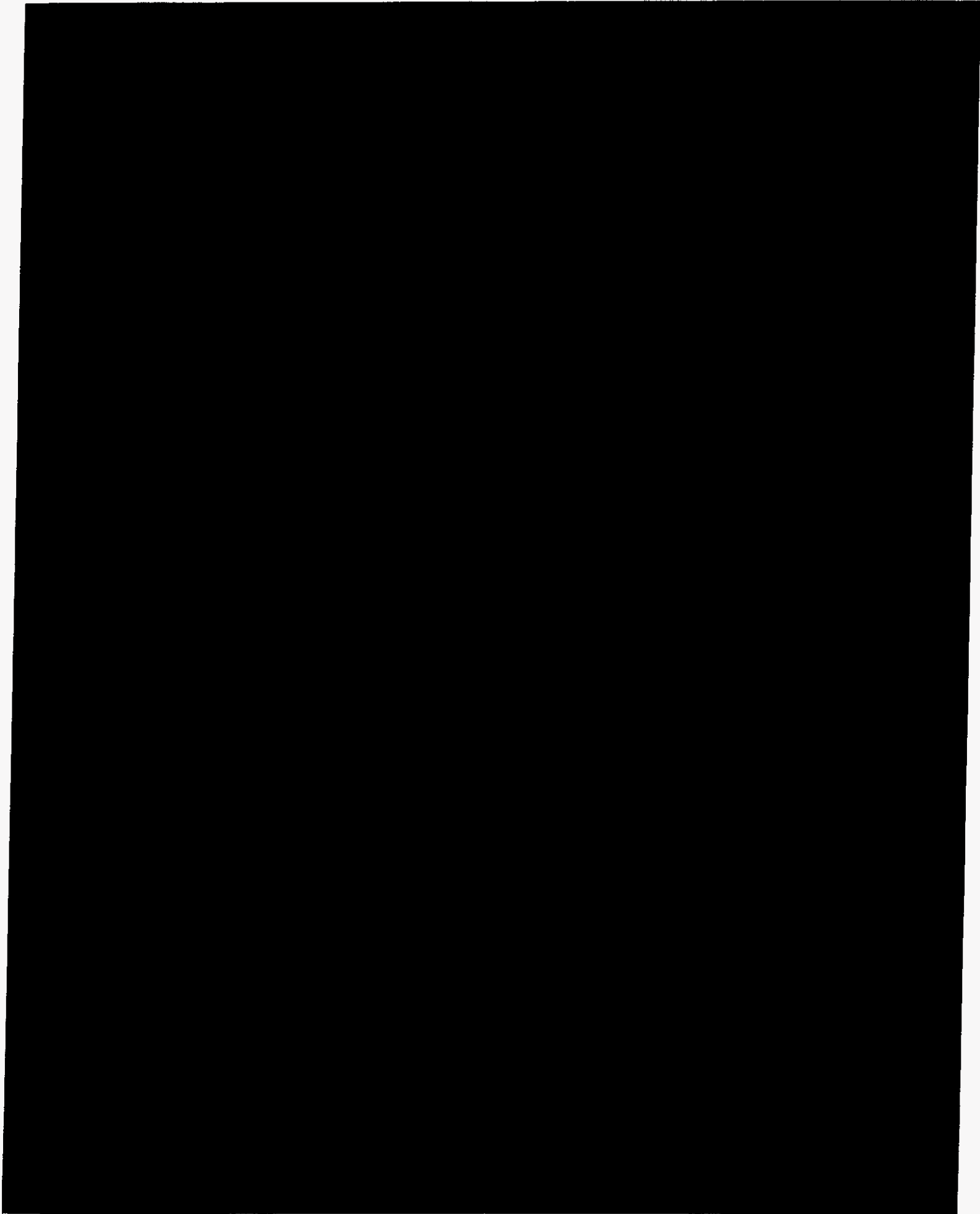


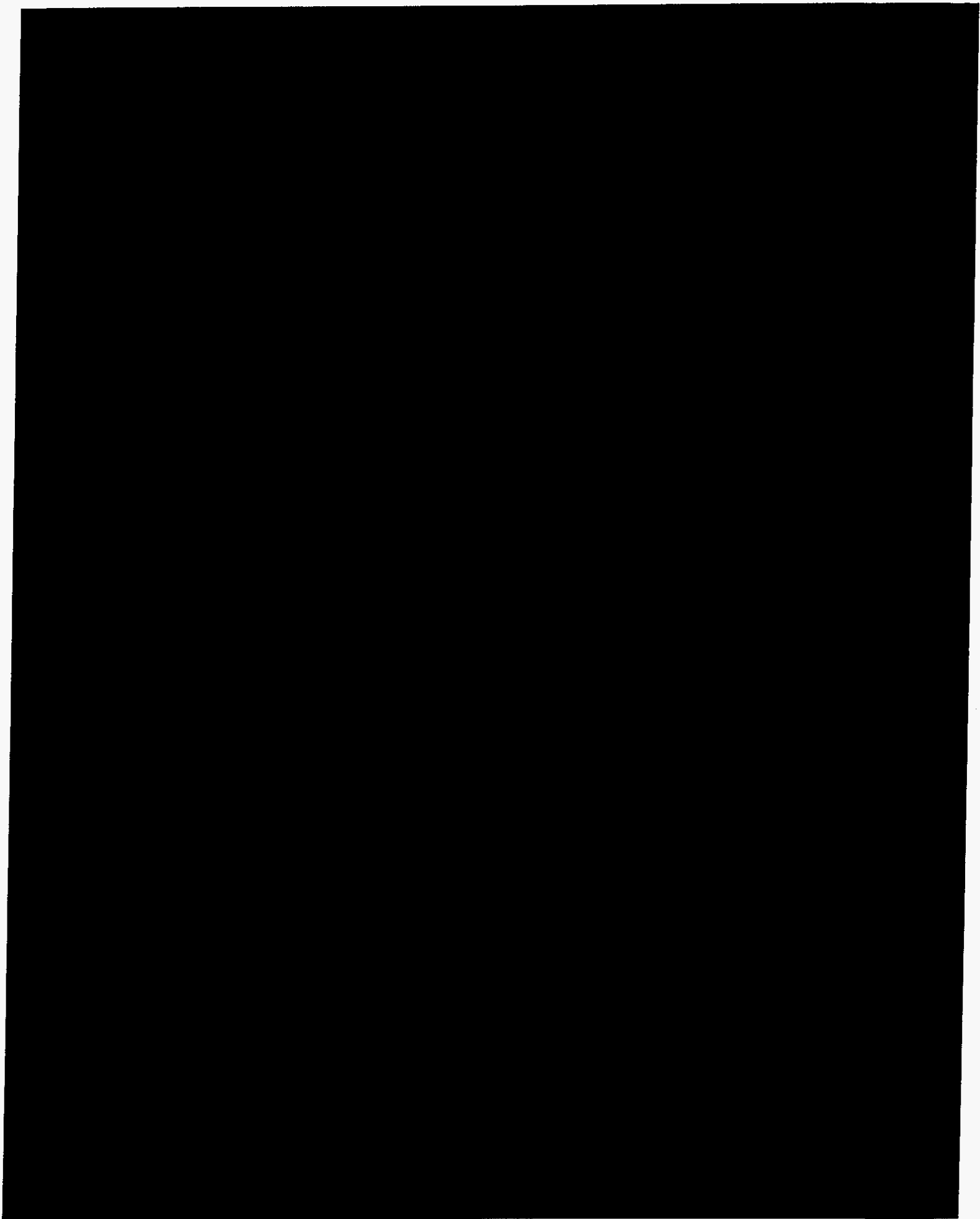


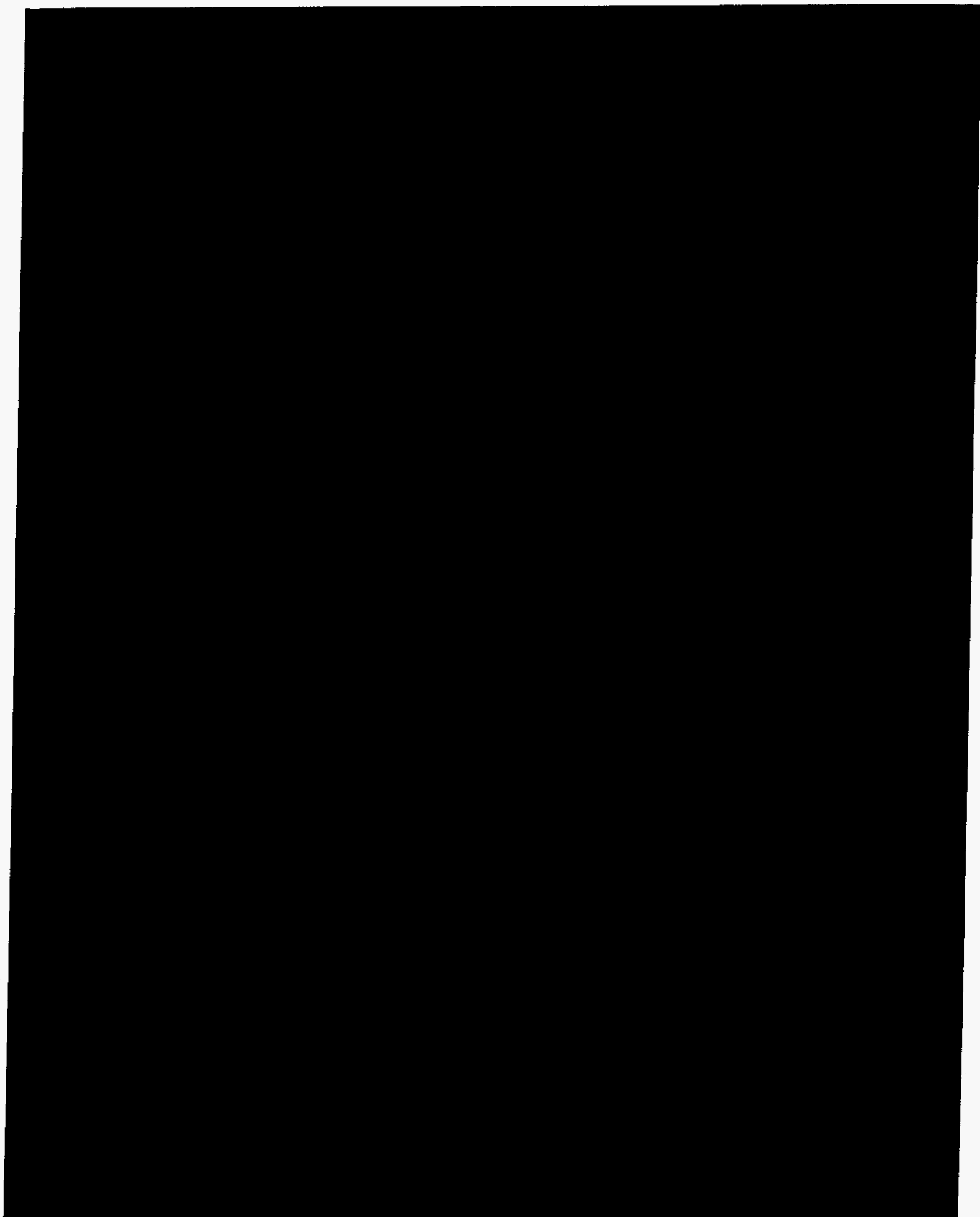


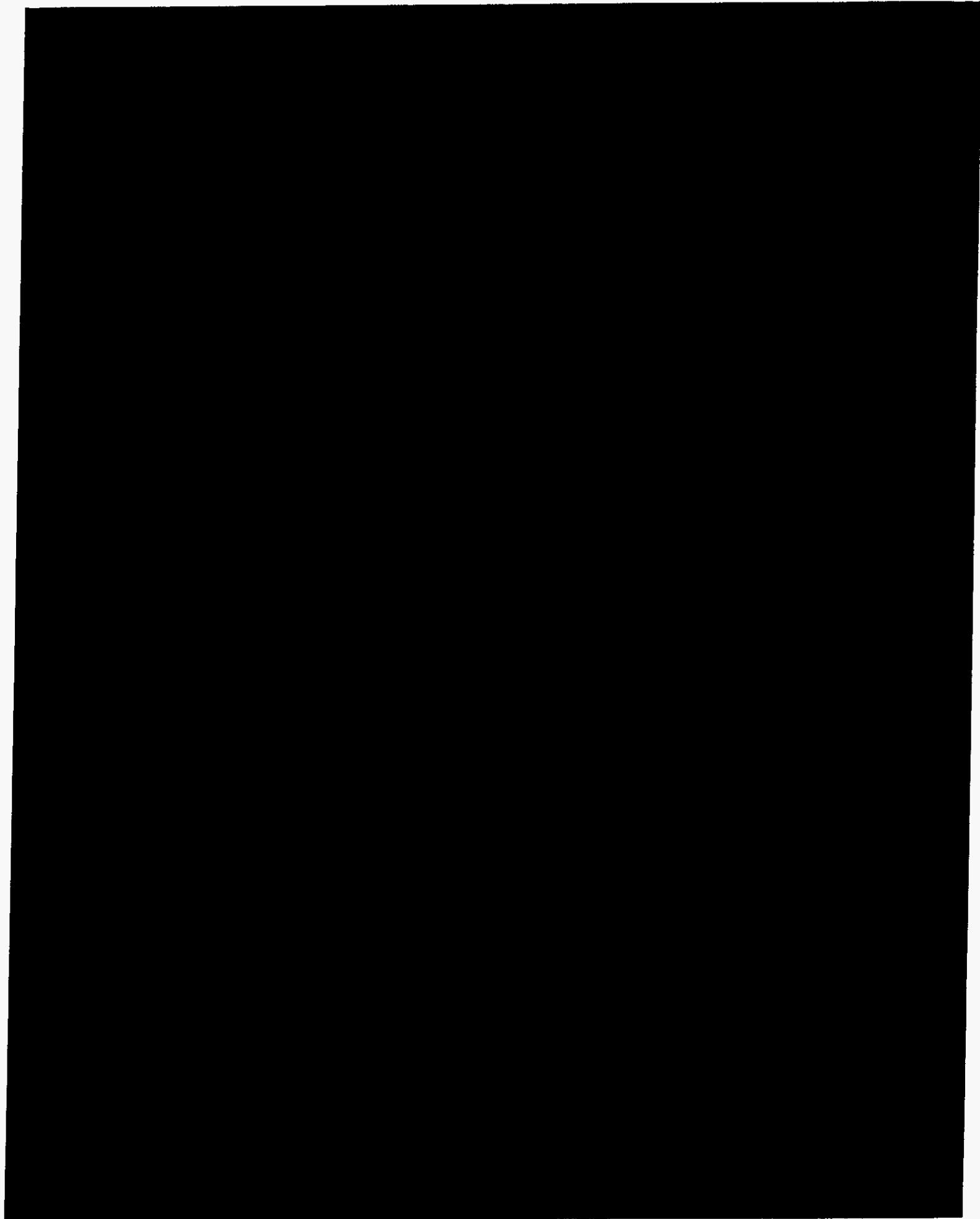


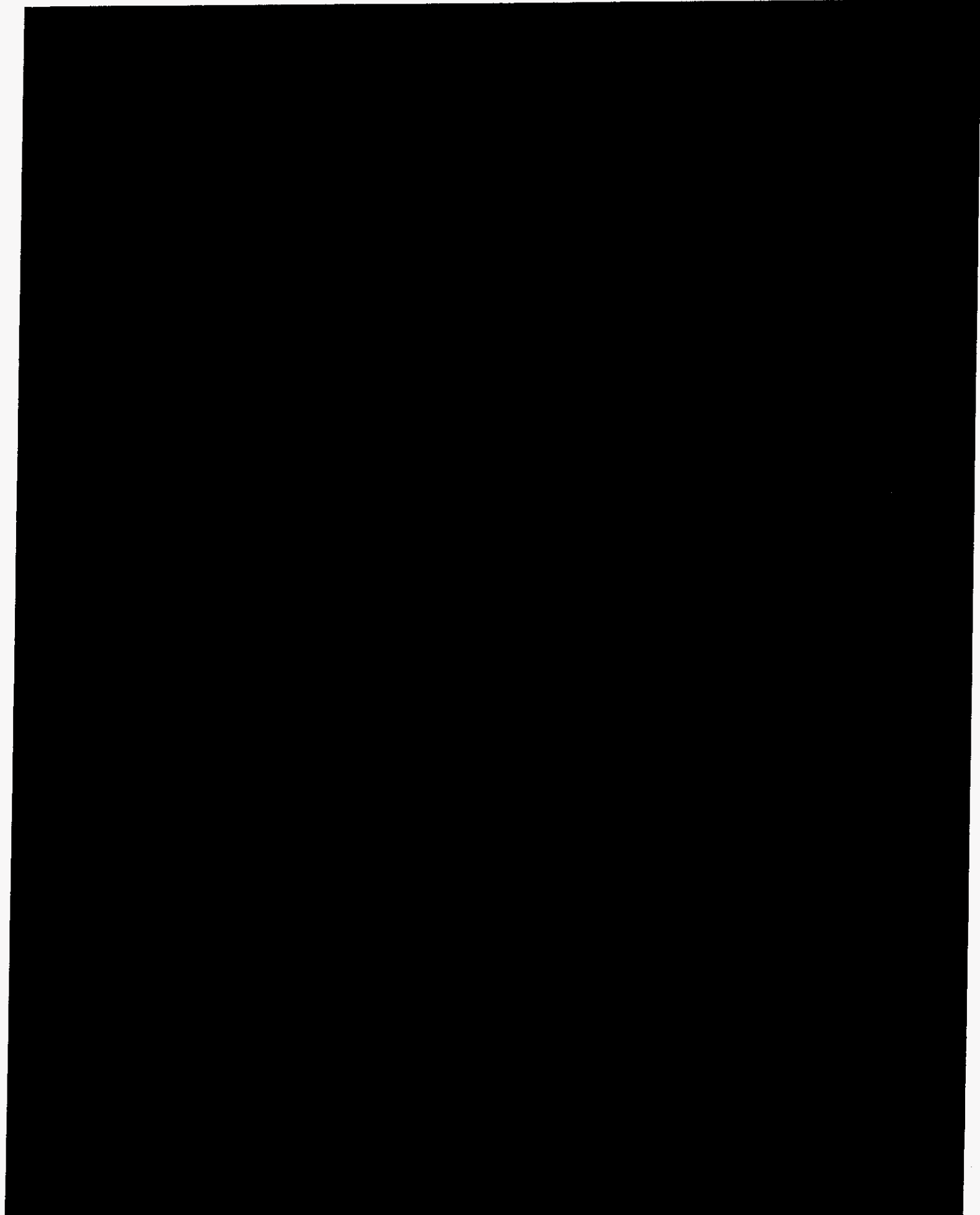


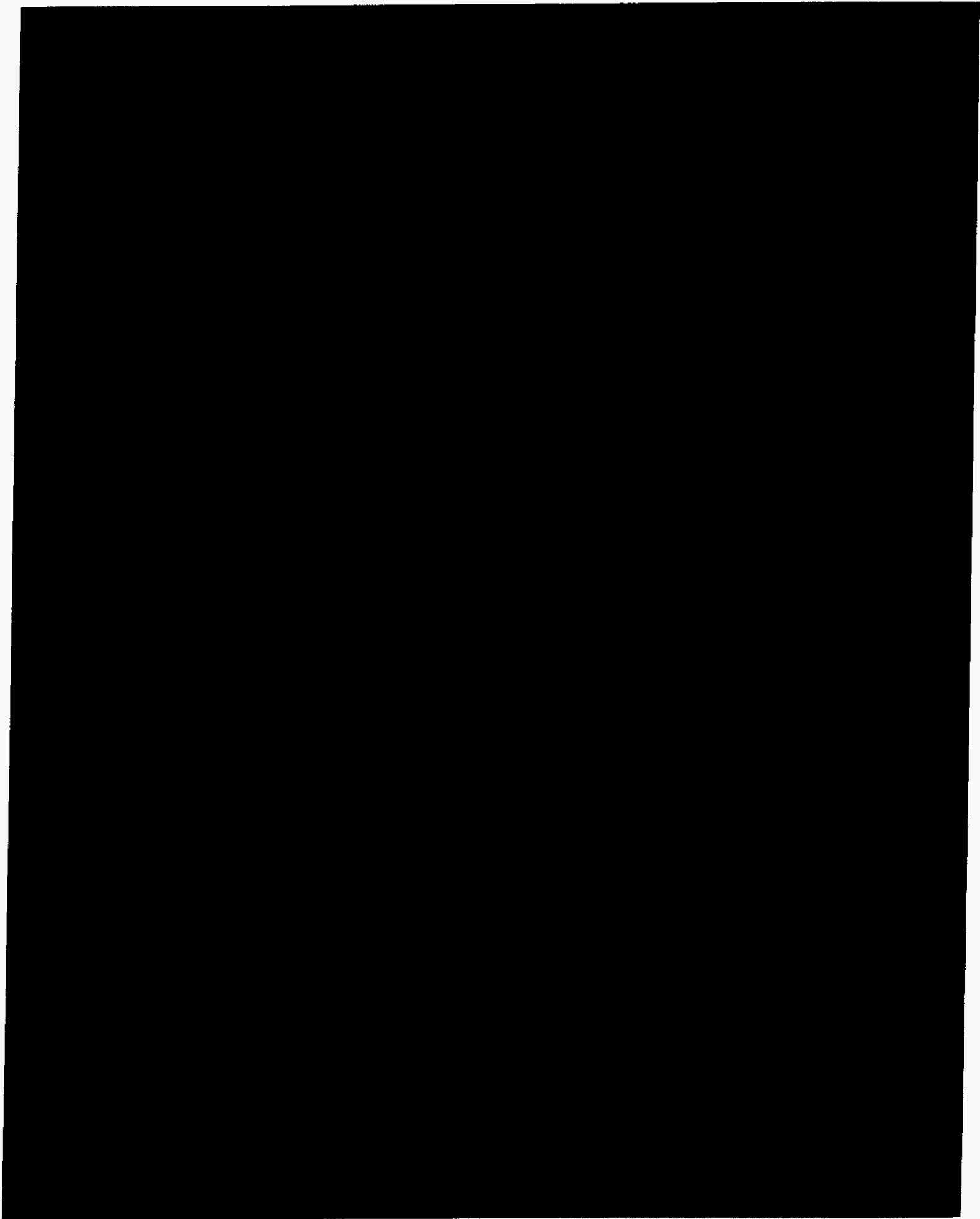


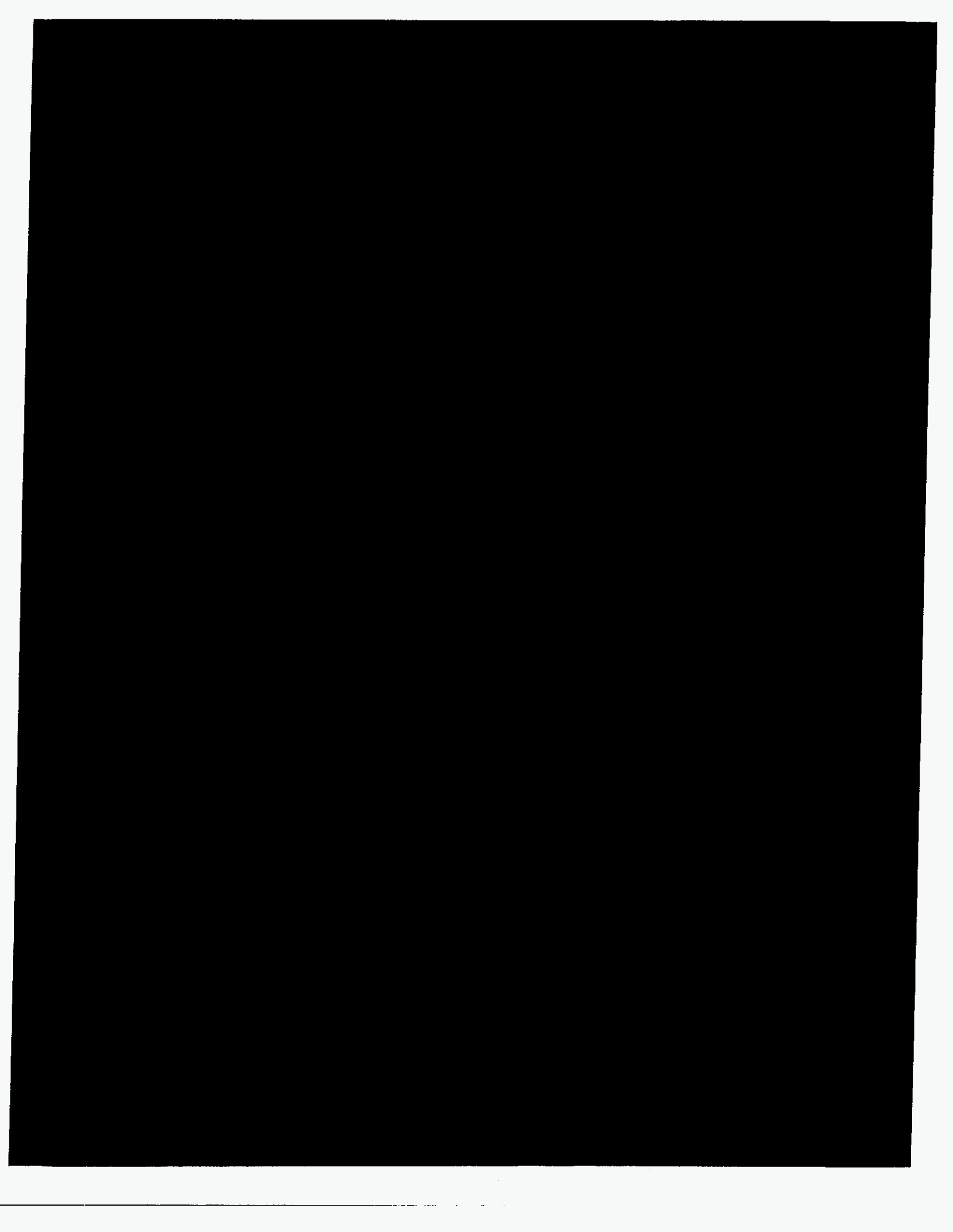


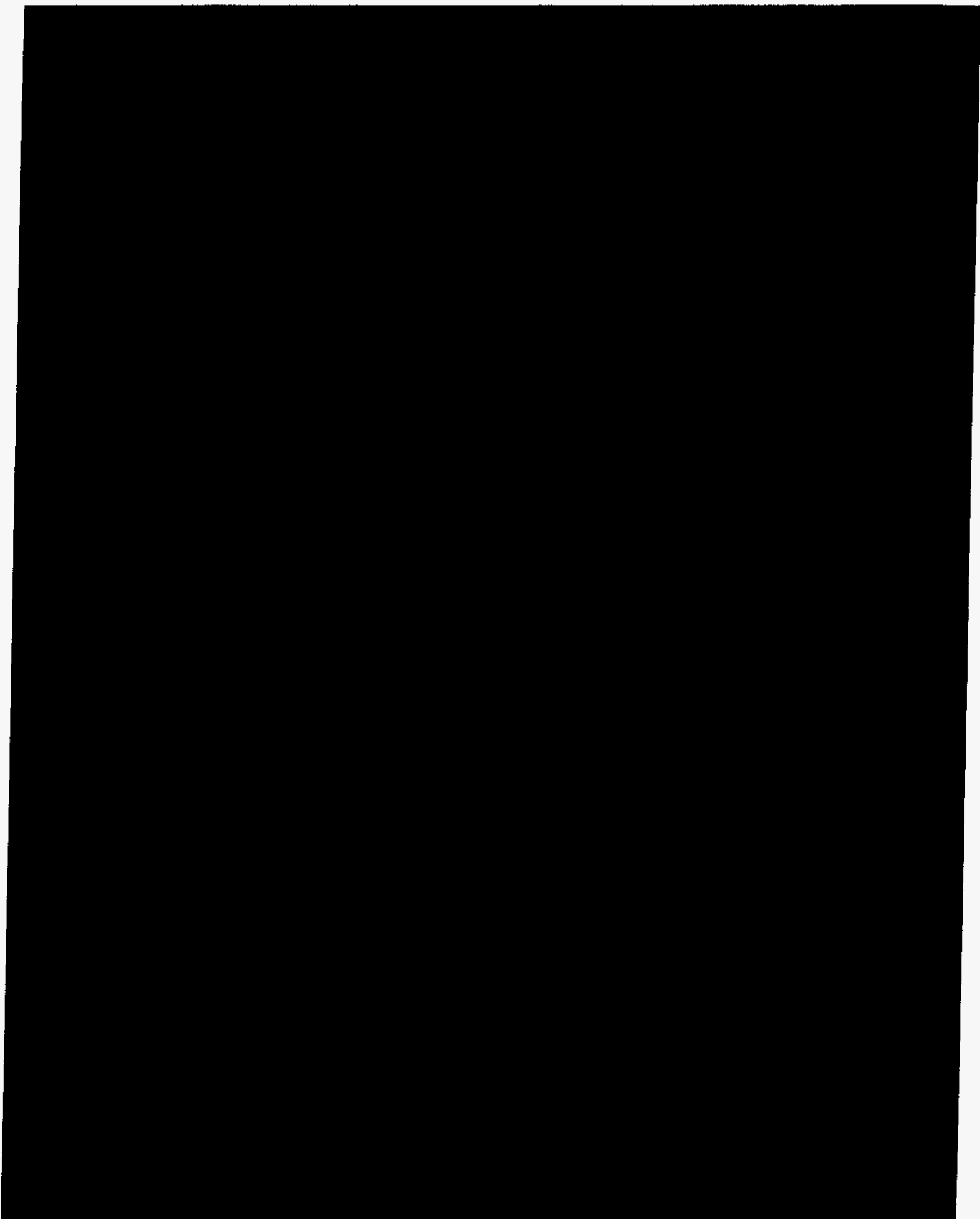


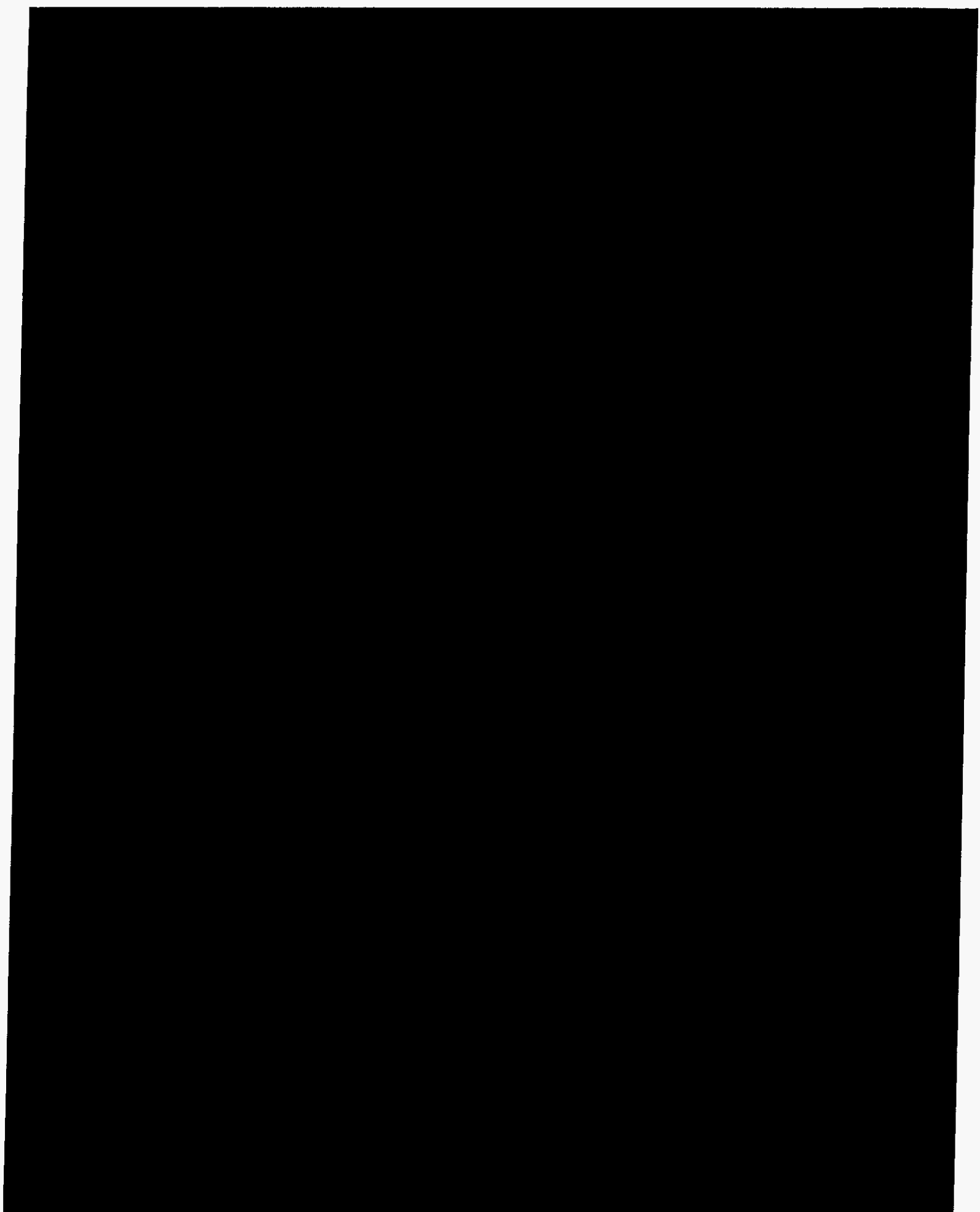


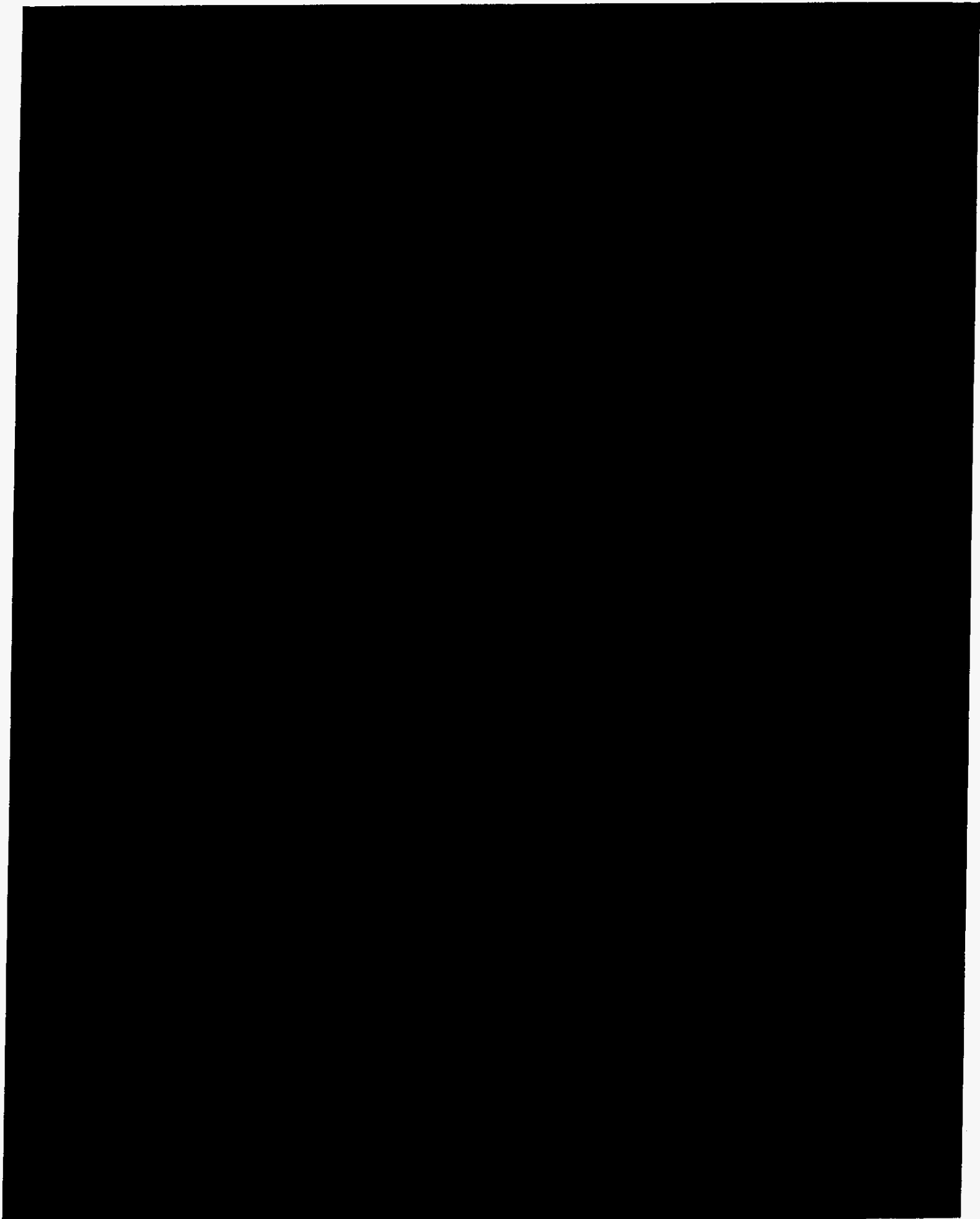












CONFIDENTIAL

Docket No. 080407-EG
Florida Power & Light Company
Supplemental Response to
FSC's 1st Request for Production
of Documents No. 2
Confidential Response

Q. Please provide a copy of the Economic and Achievable Scope of Work, and any and all revisions to that document, entered into between Florida Power & Light Company and other collaborative members and Itron for this docket.

A. FPL is providing the following information per FSC's request that FPL supplement its response to provide the total anticipated Itron contract amount.

- 1) Technical Potential Total
- 2) Achievable Potential Total
- 3) Anticipated time & materials for regulatory support:

