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Ruth Nettles

From:	Lynette Tenace [Itenace@kagmlaw.com]
Sent:	Wednesday, September 16, 2009 4:11 PM
To:	Filings@psc.state.fl.us
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Subject:	Docket No. 090079-EI

Attachments: FIPUG Notice of Service Responses to PSC 1st Request for Admissions, 1st, 2nd, 3rd Request for PODs, and 1st, 2nd Set of ROGs 09.16.09.pdf

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

a. The name, address, telephone number and email for the person responsible for the filing is:

Vicki Gordon Kaufman Jon C. Moyle, Jr. Keefe Anchors Gordon & Moyle 118 North Gadsden Street Tallahassee, FL 32301 (850) 681-3828 vkaufman@kagmlaw.com jmoyle@kagmlaw.com

b. This filing is made in Docket No. 090079-EI, In re: Petition for increase in rates by Progress Energy Florida, Inc.; Docket No. 090144-EI, In re: Petition for limited proceeding to include Bartow repowering project in base rates, by Progress Energy Florida, Inc.; Docket No. 090145-EI, In re: Petition for expedited approval of the deferral of pension expenses, authorization to charge storm hardening expenses to the storm damage reserve, and variance from or waiver of Rule 25-6.0143(1)(c), (d), and (f), F.A.C., by Progress Energy, Florida, Inc.

c. The document is filed on behalf of Florida Industrial Power Users Group.

d. The total pages in the document are 3 pages.

e. The attached document is FIPUG's Notice of Service of Responses to PSC 1st Request for Admissions, 1st, 2nd, 3rd Request for PODs, and 1st, 2nd Set of ROGs.

Lynette Tenace

NOTE: New E-Mail Address Itenace@kagmlaw.com



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DOCUMENT NUMBER-DATE D9632 SEP 16 8 FPSC-COMMISSION CLEVE

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for increase in rates by Progress
Energy Florida, Inc.DOCKET NO. 090079-EIIn re: Petition for limited proceeding to include
Bartow repowering project in base rates, by
Progress Energy Florida, Inc.DOCKET NO. 090144-EIIn re: Petition of Progress Energy Florida, Inc.
for Expedited Approval of the Deferral ofDOCKET NO. 090145-EI

FillED: September 16, 2009

THE FLORIDA INDUSTRIAL POWER USERS GROUP'S NOTICE OF SERVICE OF RESPONSES TO THE FLORIDA PUBLIC SERVICE COMMISSION STAFF'S FIRST REQUEST FOR ADMISSIONS (NOS. 1-13), FIRST SET OF INTERROGATORIES (NOS. 1-3), FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1), SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 2-5), SECOND SET OF INTERROGATORIES (NOS. 4-24), AND THIRD <u>REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 6-11)</u>

The Florida Industrial Power Users Group (FIPUG), by and through its undersigned attorneys, hereby gives notice that it has served its Responses to Staff's First Request for Admissions (Nos. 1-13), First Set of Interrogatories (Nos. 1-3), First Request for Production of Documents (No. 1), Second Request for Production of Documents (Nos. 2-5), Second Set of Interrogatories (Nos. 4-24), and Third Request for Production of Documents (Nos. 6-11) by Electronic Mail and U.S. Mail on this 16th day of September, 2009.

00CUMENT NUMBER-DATE 09632 SEP 168 FPSC-COMMISSION CLERK

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s/ Vicki Gordon Kaufman

Vicki Gordon Kaufman Jon C. Moyle, Jr. Keefe, Anchors, Gordon & Moyle 118 North Gadsden Street Tallahassee, FL 32301 (850) 681-3828 (Voice) (850) 681-8788 (Facsimile) vkaufman@kagmlaw.com jmoyle@kagmlaw.com

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Attorneys for FIPUG

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Florida Industrial Power Users Group's Responses to Staff's First Request for Admissions (Nos. 1-13), First Set of Interrogatories (Nos. 1-3), First Request for Production of Documents (No. 1), Second Request for Production of Documents (Nos. 2-5), Second Set of Interrogatories (Nos. 4-24), and Third Request for Production of Documents (Nos. 6-11) were served via Electronic Mail and First Class United States Mail this 16th day of September, 2009, to the following:

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<u>s/Vicki Gordon Kaufman</u> Vicki Gordon Kaufman