#### 10/23/20092:25:02 PM1age 1 of 1

## Ruth Nettles

090009-EI

From:	LOWE, AMY [Amy.Lowe@fpl.com]
Sent:	Friday, October 23, 2009 2:24 PM
То:	Filings@psc.state.fl.us
Cc:	Cano, Jessica
Subject:	Electronic Filing - Docket # 090009-El
Attachments:	FPL's Response in Opposition to SACE's Request for Official Recognition.pdf; FPL's Response in Opposition to SACE's Request for Official Recognition.doc

## **Electronic Filing**

a. Person responsible for this electronic filing:

Jessica A. Cano, Esq. Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408 (561) 304-5226 Jessica.Cano@fpl.com

b. Docket No. 090009-EI

IN RE: Nuclear Plant Cost Recovery Clause

c. The documents are being filed on behalf of Florida Power & Light Company.

d. There are a total of three (3) pages.

e. The document attached for electronic filing is:

# FLORIDA POWER & LIGHT COMPANY'S RESPONSE IN OPPOSITION TO THE SOUTHERN ALLIANCE FOR CLEAN ENERGY'S REQUEST FOR OFFICIAL RECOGNITION

(See attached file(s): FPL's Response in Opposition to SACE's Request for Official Recognition.pdf; FPL's Response in Opposition to SACE's Request for Official Recognition.doc)

Regards, Amy Lowe, CLA Certified Legal Assistant Senior Legal Assistant to Bryan Anderson, Senior Attorney Florida Power & Light Company Office: (561) 304-5608 Fax: (561) 691-7135 Email: amy.lowe@fpl.com

> I O B I 3 OCT 23 B FPSC-COMMISSION CLERK

10/23/2009

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

)

In re: Nuclear Power Plant Cost Recovery Clause Docket No. 090009-EI Filed: October 23, 2009

## FLORIDA POWER & LIGHT COMPANY'S RESPONSE IN OPPOSITION TO THE SOUTHERN ALLIANCE FOR CLEAN ENERGY'S REQUEST FOR OFFICIAL RECOGNITION

Florida Power & Light Company ("FPL") hereby files this response in opposition to the Southern Alliance for Clean Energy's ("SACE's") Request for Official Recognition. SACE's submittal was dated October 19, 2009, revised, filed, and served on October 21, 2009, and reserved October 22, 2009.

The Florida Public Service Commission's vote on all outstanding issues in this docket occurred on October 16, 2009. Accordingly, SACE's attempt to introduce additional documents into the record at this time is untimely.

FPL hereby adopts and incorporates herein by reference all arguments made by Progress Energy Florida in its Motion to Strike SACE's Request for Official Recognition, filed October 22, 2009.

Respectfully submitted this 23<sup>rd</sup> day of October, 2009,

Bryan S. Anderson Managing Attorney Jessica A. Cano Attorney Florida Power & Light Co. 700 Universe Blvd Juno Beach, FL 33408 Telephone: (561) 304-5226 Facsimile: (561) 691-7135

By: <u>s/Jessica A. Cano</u> Jessica A. Cano Fla. Bar. No. 0037372

DOCUMENT NUMBER-DATE

10813 OCT 23 8

FPSC-COMMISSION CLERK

#### **CERTIFICATE OF SERVICE**

#### **DOCKET NO. 090009-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic delivery this 23rd day of October, 2009 to the following:

Keino Young, Esq. Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

J. Michael Walls, Esq. Dianne M. Triplett, Esq. Carlton Fields Law Firm P.O. Box 3239 Tampa, Florida 33601-3239

John W. McWhirter, Jr., Esq. McWhirter, Reeves, Davidson, Kaufman & Arnold, P.A. Attorneys for FIPUG 400 North Tampa Street, Suite 2450 Tampa, Florida 33602

James W. Brew, Esq. Brickfield, Burchette, Ritts & Stone, P.C. 1025 Thomas Jefferson Street, NW, Eighth Floor, West Tower Washington, DC 20007-5201

Jon C. Moyle and Vicki Kaufman Keefe Anchors Gordon & Moyle PA Attorneys for FIPUG 118 N. Gadsden St. Tallahassee, Florida 32301

Edgar M. Roach, Jr. P.O. Box 27507 Raleigh, North Carolina 27601 J. R. Kelly, Esq. Charles Rehwinkel, Esq. Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, Florida 32399

R. Alexander Glenn, Esq.
John T. Burnett, Esq.
Progress Energy Service Company, LLC
P.O. Box 14042
St. Petersburg, Florida 33733-4042

Federal Executive Agencies Shayla L. McNeill, Capt, USAF c/o AFLSA/JACL-ULT 139 Barnes Drive, Suite 1 Tyndall AFB, Florida 32403-5319

Gary A. Davis, Esq. James S. Whitlock, Esq. Gary A. Davis & Associates P.O. Box 649 Hot Springs, North Carolina 28743

E. Leon Jacobs, Jr. Williams & Jacobs, LLC Counsel for SACE 1720 S. Gadsden St. MS 14 Suite 201 Tallahassee, Florida 32301

Mr. Paul Lewis, Jr. 106 East College Ave., Suite 800 Tallahassee, Florida 32301-7740 White Springs Agricultural Chemicals, Inc. Randy B. Miller P.O. Box 300 White Springs, Florida 32096 Matthew R. Bernier, Esq. Carlton Fields Law Firm 215 South Monroe Street, Suite 500 Tampa, Florida 32301

By:

<u>s/ Jessica A. Cano</u> Jessica A. Cano