

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for rate increase by Florida  
Power & Light Company

DOCKET NO.: 160021-EI

In re: Petition for approval of 2016-2018  
storm hardening plan by Florida Power &  
Light Company

DOCKET NO.: 160061-EI

In re: 2016 depreciation and  
dismantlement study by Florida Power &  
Light Company

DOCKET NO.: 160062-EI

In re: Petition for limited proceeding to  
modify and continue incentive mechanism  
by Florida Power & Light Company

DOCKET NO.: 160088-EI

FILED: August 29, 2016

---

**THE FLORIDA INDUSTRIAL POWER USERS GROUP'S NOTICE OF JOINDER OF  
OFFICE OF PUBLIC COUNSEL'S MOTION TO DISMISS FPL'S AMENDED  
REQUEST FOR CREATION OF A RESERVE AMOUNT AMORTIZATION  
MECHANISM OR ALTERNATIVELY, MOTION FOR DIRECTED FINAL  
DECISION THAT FPL HAS FAILED TO PRODUCE ANY  
EVIDENCE IN SUPPORT OF ITS REQUEST**

The Florida Industrial Power Users Group ("FIPUG"), by and through its undersigned counsel, gives notice that it joins the motion filed on or about August 29, 2016 by the Office of Public Counsel ("OPC") to Dismiss Florida Power and Light Company's ("FPL") Amended Request for Creation of a Reserve Amount Amortization Mechanism, or alternatively, Motion for Directed Final Decision that FPL has Failed to Produce any Evidence in Support of its Request in above dockets.

*/s/ Jon C. Moyle*

\_\_\_\_\_  
Jon C. Moyle, Jr.

Karen A. Putnal

Moyle Law Firm, P.A.

118 North Gadsden Street  
Tallahassee, Florida 32301  
Telephone: (850)681-3828  
Facsimile: (850)681-8788  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)  
[kputnal@moylelaw.com](mailto:kputnal@moylelaw.com)

Attorneys for Florida Industrial Power Users Group

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail this 29th day of August, 2016, to the following:

Suzanne Brownless  
Florida Public Service Commission  
2540 Shumard Oak Blvd., Room 110  
Tallahassee, FL 32399-0850  
[sbrownle@psc.state.fl.us](mailto:sbrownle@psc.state.fl.us)

Derrick Price Williamson  
Spilman Thomas & Battle, PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
[dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)

R. Wade Litchfield  
John T. Butler  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
[wade.litchfield@fpl.com](mailto:wade.litchfield@fpl.com)  
[john.butler@fpl.com](mailto:john.butler@fpl.com)

Stephanie U. Roberts  
Spilman Thomas & Battle, PLLC  
110 Oakwood Drive, Suite 500  
Winston-Salem, NC 27103  
[sroberts@spilmanlaw.com](mailto:sroberts@spilmanlaw.com)

Ken Hoffman  
Florida Power & Light Company  
215 South Monroe Street, Suite 810  
Tallahassee, Florida 32399-1400  
[Ken.hoffman@fpl.com](mailto:Ken.hoffman@fpl.com)

Kenneth Wiseman  
Mark Sundback  
William M. Rappolt  
Andrews Kurth LLP  
1350 I Street NW, Suite 1100  
Washington, D.C. 20005  
[kwiseman@andrewskurth.com](mailto:kwiseman@andrewskurth.com)  
[msundback@andrewskurth.com](mailto:msundback@andrewskurth.com)  
[wrappolt@andrewskurth.com](mailto:wrappolt@andrewskurth.com)

Erik L. Sayler  
Office of Public Counsel  
111 West Madison Street, room 812  
Tallahassee, FL 32301  
[sayler.erik@leg.state.fl.us](mailto:sayler.erik@leg.state.fl.us)

Federal Executive Agencies  
Thomas A. Jernigan  
AFCEC/JA-ULFSC  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base, FL 32403  
[Thomas.Jernigan.3@us.af.mil](mailto:Thomas.Jernigan.3@us.af.mil)

John B. Coffman  
871 Tuxedo Blvd.  
St. Louis, MO 63119-2044  
[john@johncoffman.net](mailto:john@johncoffman.net)

Robert Scheffel Wright  
John T. LaVia  
Gardner, Bist, Bowden, Bush, Dee, LaVia  
& Wright, PA  
1300 Thomaswood Drive  
Tallahassee, FL 32308  
[schef@gbwlegal.com](mailto:schef@gbwlegal.com)  
[jlavia@gbwlegal.com](mailto:jlavia@gbwlegal.com)

Diana Csank  
Sierra Club  
50 F St. NW, 8<sup>th</sup> Floor  
Washington, DC 20001  
[Diana.csank@sierraclub.org](mailto:Diana.csank@sierraclub.org)

Jack McRay  
AARP Florida  
200 W. College Ave., #304  
Tallahassee, FL 32301  
[jmcray@aarp.org](mailto:jmcray@aarp.org)

Nathan A Skop  
420 NW 50th Blvd.  
Gainesville, FL 32607  
[N\\_skop@hotmail.com](mailto:N_skop@hotmail.com)

*/s/ Jon C. Moyle*  
\_\_\_\_\_  
Jon C. Moyle, Jr