

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Review of 2022-2031 Storm Protection  
Plan, pursuant to Rule 25-6.030, F.A.C.,  
Florida Public Utility Company.

DOCKET NO.: 20220049-EI

DATED: April 14, 2022

**NOTICE OF SERVICE OF CITIZENS' SECOND SET OF INTERROGATORIES  
AND SECOND REQUEST TO PRODUCE DOCUMENTS  
TO FLORIDA PUBLIC UTILITIES COMPANY**

Pursuant to Section 350.0611, Florida Statutes, the Citizens of the State of Florida, by and through Patricia A. Christensen, Associate Public Counsel, serve this notice that they have served their Second Set of Interrogatories (No. 7-12) and Second Request to Produce Documents (No. 3). This discovery is being served to Mike Cassel and Beth Keating, Florida Public Utilities Company, ("FPUC"), 215 S. Monroe St., Ste. 601, Tallahassee, FL 32301 on this 14<sup>th</sup> day of April, 2022.

Respectfully submitted,

Richard Gentry  
Public Counsel

/s/Patricia A. Christensen

Patricia A. Christensen  
Associate Public Counsel

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400

Attorneys for the Citizens  
of the State of Florida

**CERTIFICATE OF SERVICE**

**Docket No. 20220049-EI**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 14<sup>th</sup> day of April 2022, to the following:

Mike Cassel  
Florida Public Utilities Company  
208 Wildlight Ave.  
Yulee FL 32097  
[mcassel@fpuc.com](mailto:mcassel@fpuc.com)

Theresa Tan/Jacob Imig/Walter Trierweiler  
Florida Public Service Commission 2540  
Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
Office of General Counsel  
[ltan@psc.state.fl.us](mailto:ltan@psc.state.fl.us)  
[jimig@psc.state.fl.us](mailto:jimig@psc.state.fl.us)  
[wtrierwe@psc.state.fl.us](mailto:wtrierwe@psc.state.fl.us)

Ms. Paula K. Brown  
Tampa Electric Company  
Regulatory Affairs  
P. O. Box 111  
Tampa FL 33601-0111  
[regdept@tecoenergy.com](mailto:regdept@tecoenergy.com)

Robert Pickels/Matthew Bernier  
Duke Energy  
106 East College Avenue, Suite 800  
Tallahassee FL 32301-7740  
[Robert.Pickels@duke-energy.com](mailto:Robert.Pickels@duke-energy.com)  
[Matthew.Bernier@duke-energy.com](mailto:Matthew.Bernier@duke-energy.com)

Christopher T. Wright  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach FL 33408-0420  
[Christopher.Wright@fpl.com](mailto:Christopher.Wright@fpl.com)

Kenneth A. Hoffman  
Florida Power & Light Company  
134 West Jefferson Street  
Tallahassee FL 32301-1713  
[ken.hoffman@fpl.com](mailto:ken.hoffman@fpl.com)

Malcolm Means  
Ausley Law Firm  
P.O. Box 391  
Tallahassee, FL 32302  
[mmeans@ausley.com](mailto:mmeans@ausley.com)

Beth Keating  
Gunster Law Firm  
215 S. Monroe St., Ste. 601  
Tallahassee, FL 32301  
[bkeating@gunster.com](mailto:bkeating@gunster.com)

**/s/Patricia A. Christensen**

Patricia A. Christensen  
Associate Public Counsel  
[Christensen.patty@leg.state.fl.us](mailto:Christensen.patty@leg.state.fl.us)