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August 12, 2022

**BY E-FILING**

Mr. Adam Teitzman, Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: **Docket No. 20220010-EI: Storm Protection Plan Cost Recovery Clause**

Dear Mr. Teitzman:

Attached for filing on behalf of Florida Public Utilities Company, please find the Company's Notice of Service of its responses and objections to the Commission Staff's Third Set of Interrogatories and Second Requests for Production to the Company.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,



Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

MEK  
cc:(Certificate of Service)

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Storm Protection Plan Cost Recovery Clause


DOCKET NO. 20220010-EI

DATED: August 12, 2022

**FLORIDA PUBLIC UTILITIES COMPANY'S NOTICE OF SERVICE OF RESPONSES  
AND OBJECTIONS TO COMMISSION STAFF'S THIRD SET OF  
INTERROGATORIES (NOS. 32-46) AND SECOND REQUESTS FOR PRODUCTION  
(NO. 4)**

NOTICE IS HEREBY GIVEN that Florida Public Utilities Company, by and through its undersigned counsel, has served its Responses to the Commission Staff's Third Set of Interrogatories (No. 32-46) and Second Requests for Production (No. 4) to Shaw Stiller, Esquire, 2540 Shumard Oak Boulevard, at [sstiller@psc.state.fl.us](mailto:sstiller@psc.state.fl.us) this 12<sup>th</sup> day of August, 2022.

Respectfully submitted,



**Beth Keating**

Gunster, Yoakley & Stewart, P.A.

215 S. Monroe Street, Suite 601

Tallahassee, Florida 32301

Telephone: (850) 521-1706

Facsimile: (850) 576-0902


*Attorneys for Florida Public Utilities Company*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of Florida Public Utilities Company’s Notice of Service of Responses to Staff’s Third Set of Interrogatories and Second Requests for Production has been furnished by Electronic Mail to the following parties of record this 12th day of August, 2022:

<p>Shaw Stiller                  Florida Public Service Commission                  2540 Shumard Oak Boulevard                  Tallahassee, FL 32399-0850  <a href="mailto:sstiller@psc.state.fl.us">sstiller@psc.state.fl.us</a></p>	<p>J. Jeffry Wahlen/Malcolm Means/Virginia Ponder                  Ausley Law Firm                  Post Office Box 391                  Tallahassee, FL 32302  <a href="mailto:jwahlen@ausley.com">jwahlen@ausley.com</a>  <a href="mailto:mmeans@ausley.com">mmeans@ausley.com</a>  <a href="mailto:vponder@ausley.com">vponder@ausley.com</a></p>
<p>Richard Gentry/P. Christensen/A. Pirrello/S. Morse/Charles Rehwinkel                  Office of Public Counsel                  c/o The Florida Legislature                  111 W. Madison Street, Room 812                  Tallahassee, FL 32399-1400  <a href="mailto:Gentry.Richard@leg.state.fl.us">Gentry.Richard@leg.state.fl.us</a>  <a href="mailto:Rehwinkel.Charles@leg.state.fl.us">Rehwinkel.Charles@leg.state.fl.us</a>  <a href="mailto:Christensen.patty@leg.state.fl.us">Christensen.patty@leg.state.fl.us</a>  <a href="mailto:Morse.stephanie@leg.state.fl.us">Morse.stephanie@leg.state.fl.us</a>  <a href="mailto:Pirrello.Anastacia@leg.state.fl.us">Pirrello.Anastacia@leg.state.fl.us</a></p>	<p>James W. Brew/Laura Baker                  Stone Matheis Xenopoulos &amp; Brew, PC                  Eighth Floor, West Tower                  1025 Thomas Jefferson Street, NW                  Washington, DC 20007  <a href="mailto:jbrew@smxblaw.com">jbrew@smxblaw.com</a>  <a href="mailto:lwb@smxblaw.com">lwb@smxblaw.com</a></p>
<p>Christopher Wright                  Florida Power &amp; Light Company                  700 Universe Boulevard                  Juno Beach, FL 33408-0420  <a href="mailto:Christopher.Wright@fpl.com">Christopher.Wright@fpl.com</a></p>	<p>Kenneth Hoffman                  Florida Power &amp; Light Company                  215 South Monroe Street, Suite 810                  Tallahassee, FL 32301  <a href="mailto:Ken.Hoffman@fpl.com">Ken.Hoffman@fpl.com</a></p>
<p>Ms. Paula K. Brown                  Tampa Electric Company                  Regulatory Affairs                  P.O. Box 111                  Tampa, FL 33601-0111  <a href="mailto:Regdept@tecoenergy.com">Regdept@tecoenergy.com</a></p>	<p>Florida Industrial Users Power Group                  Jon C. Moyle, Jr.                  Moyle Law Firm                  118 North Gadsden Street                  Tallahassee, FL 32301  <a href="mailto:jmoyle@moylelaw.com">jmoyle@moylelaw.com</a></p>

<p>Mike Cassel Florida Public Utilities Company 208 Wildlight Ave. Yulee, FL 32097 <a href="mailto:mcassel@fpuc.com">mcassel@fpuc.com</a></p>	<p>Matthew Bernier Robert Pickels Stephanie Cuello Duke Energy 106 East College Avenue, Suite 800 Tallahassee, FL 32301 <a href="mailto:Matthew.Bernier@duke-energy.com">Matthew.Bernier@duke-energy.com</a> <a href="mailto:Robert.Pickels@duke-energy.com">Robert.Pickels@duke-energy.com</a> <a href="mailto:Stephanie.Cuello@duke-energy.com">Stephanie.Cuello@duke-energy.com</a></p>
	<p>Dianne M. Triplett Duke Energy 299 First Avenue North St. Petersburg, FL 33701 <a href="mailto:Dianne.Triplett@duke-energy.com">Dianne.Triplett@duke-energy.com</a></p>
<p>Peter J. Mattheis/Michael K. Lavanga/Joseph Briscar NUCOR 1025 Thomas Jefferson St., NW, Ste. 800 West Washington DC 20007-5201 (202) 342-0800 (202) 342-0807 <a href="mailto:mkl@smxblaw.com">mkl@smxblaw.com</a> <a href="mailto:pjm@smxblaw.com">pjm@smxblaw.com</a> <a href="mailto:jrb@smxblaw.com">jrb@smxblaw.com</a></p>	<p>Stephanie U. Eaton c/o Spilman Law Firm 110 Oakwood Drive, Suite 500 Winston-Salem NC 27103 (336) 631-1062 (339) 725-4476 And Derrick Price Williamson/Barry A. Naum c/o Spilman Law Firm 1100 Bent Creek Boulevard, Suite 101 Mechanicsburg PA 17050 (717) 795-2741 (717) 795-2743  <a href="mailto:dwilliamson@spilmanlaw.com">dwilliamson@spilmanlaw.com</a> <a href="mailto:bnaum@spilmanlaw.com">bnaum@spilmanlaw.com</a> <a href="mailto:seaton@spilmanlaw.com">seaton@spilmanlaw.com</a></p>

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