

ORIGINAL



JACK SHREVE  
PUBLIC COUNSEL

STATE OF FLORIDA  
OFFICE OF THE PUBLIC COUNSEL

c/o The Florida Legislature  
111 West Madison St.  
Room 812  
Tallahassee, Florida 32399-1400  
850-488-9330

September 30, 2002

Ms. Blanca S. Bayó, Director  
Division of the Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0870

RECEIVED FPSC  
02 SEP 30 PM 4:20  
COMMISSION  
CLERK

RE: Docket No. 020007-EI

Dear Ms. Bayó:

Enclosed for filing in the above-referenced docket are the original and 1 copy of the Notice of Service of Citizens first set of requests for interrogatories (Nos. 1-8) and first set of request for production of documents (Nos. 1-3) to Florida Power Corporation.

AUS \_\_\_\_\_  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC   I    
OTH \_\_\_\_\_

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office

Sincerely,

Robert Vandiver  
Associate Public Counsel

RV/pwd  
Enclosures

RECEIVED & FILED

RLM  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

10493 SEP 30 02

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Environmental cost )  
recovery clause. )  
\_\_\_\_\_ )

DOCKET No. 020007- EI  
DATED: September 30, 2002

**NOTICE OF SERVICE**

Pursuant to Section 350.0611, Florida Statutes, the Citizens of the State of Florida, by and through Jack Shreve, Public Counsel, serve this notice that they have served their first set of interrogatories (Nos. 1-8) and their first request for production of documents (Nos. 1-3) to Florida Power Corporation.

Respectfully submitted,



Robert Vandiver  
Associate Public Counsel

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

Attorney for the Citizens  
Of the State of Florida

DOCUMENT NUMBER - 020007- EI

10493 SEP 30 2002

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Environmental cost )  
recovery clause. )  
\_\_\_\_\_ )

DOCKET No. 020007- EI  
DATED: September 30, 2002

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the original and one copy of Citizen's First Set of Interrogatories (Nos. 1 – 7), have been served VIA-U.S. MAIL to Gary V. Perko, Hopping Green & Sams, 123 South Calhoun Street, Tallahassee, Florida, 32314, on behalf of Citizens of the State of Florida, and that a true and correct copy thereof has been furnished by U.S. Mail, this 30<sup>th</sup> day of September, 2002, to the following:

Tampa Electric Company  
Ms. Angela Llewellyn  
Regulatory Affairs  
P.O. Box 111  
Tampa, FL 33601-0111

Steel Law Firm (Miami)  
John T. Butler, P.A.  
200 South Biscayne Boulevard  
Suite 4000  
Miami, FL 33131-2398

Florida Power Corporation  
James A. McGee  
100 Central Avenue  
St. Petersburg, FL 33701

Ausley Law Firm  
James Beasley/ Lee Willis  
P.O. Box 391  
Tallahassee, FL 32303

Beggs & Lane Law Firm  
Jeffrey Stone / Russell Badders  
P.O. Box 12950  
Pensacola, FL 32591-2950

Florida Power & Light Company  
Mr. R. Wade Litchfield  
700 Universe Boulevard  
Juno Beach, FL 33408 – 0420

Florida Power & Light Company  
Mr. Bill Walker  
215 South Monroe Street,  
Suite 810  
Tallahassee, FL 32301-1859

Gulf Power Company  
Ms. Susan D. Ritenour  
One Energy Place  
Pensacola, FL 32520-0780

CERTIFICATE OF SERVICE  
DOCKET NO. 020007-EI

McWhirter Law Firm  
Joseph McGlothlin  
Vicki Kaufman  
117 South Gadsden Street  
Tallahassee, FL 32301

Tampa Electric Company  
Ms. Angela Llewellyn  
Regulatory Affairs  
P.O. Box 111  
Tampa, FL 33601-0111

  
\_\_\_\_\_  
ROBERT VANDIVER

September 30, 2002

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and Administrative Services  
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Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Vandiver", with a stylized flourish at the end.

Robert Vandiver  
Associate Public Counsel

RV/pwd  
Enclosures