

Ruth Nettles

From: Lynette Tenace [ltenace@kagmlaw.com]
Sent: Thursday, May 21, 2009 4:14 PM
To: Filings@psc.state.fl.us
Cc: Lisa Bennett; Theresa Walsh; Anna Williams; Jean Hartman; Martha Brown; mcglothlin.joseph@leg.state.fl.us; swright@yvlaw.net; support@saporitoenergyconsultants.com; kwiseman@andrewskurth.com; Wade_litchfield@fpl.com; John.Butler@fpl.com; sugarman@sugarmansusskind.com; barmstrong@ngnlaw.com; Cecilia.bradley@myfloridalegal.com; Jack.leon@fpl.com; jmcwhirter@mac-law.com
Subject: Docket No. 080677-EI
Attachments: FIPUG Notice of Service Objections to FPL 1st Set of ROGs (Nos. 1-22) and 1st Request for PODs (Nos. 1-18) 05.21.09.pdf

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

- a. The name, address, telephone number and email for the person responsible for the filing is:

Vicki Gordon Kaufman
 Jon C. Moyle, Jr.
 Keefe Anchors Gordon & Moyle
 118 North Gadsden Street
 Tallahassee, FL 32301
 (850) 681-3828
 vkaufman@kagmlaw.com
 jmoyle@kagmlaw.com

- b. This filing is made in Docket No. 080677-EI, In re: Petition for increase in rates by Florida Power & Light Company.
- c. The document is filed on behalf of Florida Industrial Power Users Group.
- d. The total pages in the document are 2 pages.
- e. The attached document is FIPUG's Notice of Service of Objections to FPL 1st Set of Interrogatories (Nos. 1-22) and 1st Request for Production of Documents (Nos. 1-18).

Lynette Tenace

NOTE: New E-Mail Address
 ltenace@kagmlaw.com



Keefe, Anchors, Gordon and Moyle, P.A.
 The Perkins House
 118 N. Gadsden St.
 Tallahassee, FL 32301
 850-681-3828 (Voice)
 850-681-8788 (Fax)
 www.kagmlaw.com

DOCUMENT NUMBER-DATE
 05080 MAY 21 09
 FPSC-COMMISSION CLERK

The information contained in this e-mail is confidential and may be subject to the attorney client privilege or may constitute

privileged work product. The information is intended only for the use of the individual or entity to whom it is addressed. If you are not the intended recipient, or the agent or employee responsible to deliver it to the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is strictly prohibited. If you receive this e-mail in error, please notify us by telephone or return e-mail immediately. Thank you.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase
by Florida Power & Light Company

DOCKET NO. 080677-EI
Filed: May 21, 2009

**NOTICE OF SERVICE OF
THE FLORIDA INDUSTRIAL POWER USERS GROUP'S
OBJECTIONS TO FLORIDA POWER & LIGHT COMPANY'S
FIRST SET OF INTERROGATORIES (NOS. 1-22) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-18)**

The Florida Industrial Power Users Group (FIPUG), by and through its undersigned attorneys, hereby gives notice that it has served its Objections to Florida Power & Light Company's First Set of Interrogatories (Nos. 1-22), and First Request for Production of Documents (Nos. 1-18) to: John T. Butler, attorney for Florida Power & Light Company, on this 21st day of May, 2009.

s/ Vicki Gordon Kaufman

Vicki Gordon Kaufman
Jon C. Moyle, Jr.
Keefe, Anchors, Gordon & Moyle
118 North Gadsden Street
Tallahassee, FL 32301
(850) 681-3828 (Voice)
(850) 681-8788 (Facsimile)
vkaufman@kagmlaw.com
jmoyle@kagmlaw.com

John W. McWhirter, Jr.
P.O. Box 3350
Tampa, FL 33601-3350
(813) 505-8055 (Voice)
(813) 221-1854 (Facsimile)
jmcwhirter@mac-law.com

Attorneys for FIPUG

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Florida Industrial Power Users Group's Objections to FPL's First Set of Interrogatories (Nos. 1-22), and First Request for Production of Documents (Nos. 1-18) was served via Electronic Mail and First Class United States Mail this 21st day of May, 2009, to the following:

Lisa Bennett, Theresa Farley Walsh
Anna Williams, Jean Hartman, Martha Brown
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
lbennett@psc.state.fl.us
tfwalsh@psc.state.fl.us
anwillia@psc.state.fl.us
jhartman@psc.state.fl.us
mbrown@psc.state.fl.us

J.R Kelly/Joseph McGlothlin
Office of Public Counsel
111 West Madison Street
Room 812
Tallahassee, Florida 32399
mcglothlin.joseph@leg.state.fl.us

Robert Scheffel Wright
John T. LaVia, III
Young van Assenderp, P.A.
225 South Adams Street, Suite 200
Tallahassee, Florida 32301
swright@yvlaw.net

Thomas Saporito
Saporito Energy Consultants
Post Office Box 8413
Jupiter, FL 33468-8413
support@saporitoenergyconsultants.com

Brian P. Armstrong/Marlene K. Stern
City of South Daytona
c/o Nabors Law Firm
1500 Mahan Drive, Suite 200
Tallahassee, FL 32308
barmstrong@ngnlaw.com

K. Wiseman
Andrews Kurth LLP
13501 I Street NW
Suite 1100
Washington, DC 20005
kwiseman@andrewskurth.com

Wade Litchfield
Florida Power & Light Company
215 South Monroe Street
Suite 810
Tallahassee, FL 32301-1859
Wade_litchfield@fpl.com

John T. Butler
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, FL 33408-0420
John.Butler@fpl.com

Robert A. Sugarman
I.B.E.W. System Council U-4
c/o Sugarman Law Firm
100 Miracle Mile
Suite 300
Coral Gables, FL 33134
sugarman@sugarmansusskind.com

Bill McCollum/Cecilia Bradley
The Capitol – PL01
Tallahassee, FL 32399-1050
Cecilia.bradley@myfloridalegal.com

s/Vicki Gordon Kaufman
Vicki Gordon Kaufman