

Dorothy Menasco

From: ljacobs50@comcast.net
Sent: Thursday, July 30, 2009 4:38 PM
To: Filings@psc.state.fl.us
Cc: Katherine Fleming; Alex Glenn; Brenda Buchan; C. Browder; Charles Beck; Jack English; J.R. Kelly; Jack Leon; James D. Beasley; Jeremy Susac; John T. Burnett; Myron Rollins; Norman H. Horton; Paul Lewis; Paula K. Brown; Randy Halley; Richard J. Vento; Steven Griffin; Susan Clark; sandra.brice@pgnmail.com; Susan Ritenour; Suzanne Brownless; Teala Milton; Wade_Litchfield; April Vicary; KushnerB@bv.com; GARYP@hgslaw.com; vkaufman@kagmlaw.com; jmoyle@kagmlaw.com; cguyton@ssd.com; Jessica Cano; ryoung@yvlaw.net; tbuford@yvlaw.net
Subject: Docket Nos. 080407-080413 NRDC-SACE Notice of Svc of Objections and Responses to Gulf's 1st POD
Attachments: NRDC-SACE Notice of svc responses to GPC 1st POD.pdf

a. The person responsible for this filing is:

E. Leon Jacobs, Jr.
Williams & Jacobs
1720 S. Gadsden St. MS 14
Tallahassee, Fl 32301
(850) 222-1246
ljacobs50@comcast.net

b. This filing is made in: Docket Nos. 080407-080413 Numeric Conservation Goals:

c. This filing is made on behalf of the Natural Resources Defense Council, Inc., and the Southern Alliance for Clean Energy, Inc.

d. The total pages in the attached documents are four.

e. The document consists of NRDC-SACE's Notice of Service of Objections and Responses to Gulf Power's First Request for Production of Documents (Nos. 1-4)..

DOCUMENT NUMBER-DATE

07833 JUL 30 8

7/31/2009

FPSC-COMMISSION CLERK

WILLIAMS & JACOBS, LLC

ATTORNEYS AT LAW
1720 S. GADSDEN ST. MS. 14
TALLAHASSEE, FL 32301

MOSES WILLIAMS, ESQ.

E. LEON JACOBS, JR., ESQ.

July 30, 2009

Ann Cole
Director, Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, Florida 32399-0850

RE: Docket No. 080407-EG Florida Power & Light Company;
Docket No. 080408-EG Progress Energy, Florida, Inc. ;
Docket No. 080409-EG Tampa Electric Company;
Docket No. 080410-EG Gulf Power Company ;
Docket No. 080411-EG Florida Public Utilities Company;
Docket No. 080412-EG Orlando Utilities C; and
Docket No. 080413-EG Jacksonville Electric Authority

Dear Ms. Cole:

On behalf of the Southern Alliance for Clean Energy, and the Natural Resources Defense Council, I have enclosed for filing Notice of Service of NRDC-SACE Objections and Responses to Gulf Power's First Request for Production of Documents (Nos. 1-4) in the above-stated dockets. I thank you for your attention to this matter.

Sincerely,

/s/ E. Leon Jacobs, Jr.

E. Leon Jacobs, Jr.
Attorney for Intervenors

Enclosures

DOCUMENT NUMBER-DATE

07833 JUL 30 09

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission Review of Numeric) DOCKET NO. 080407-EG
Conservation Goals)
Florida Power & Light Company)
_____)

In re: Commission Review of Numeric) DOCKET NO. 080408-EG
Conservation Goals)
Progress Energy, Florida, Inc.)
_____)

In re: Commission Review of Numeric) DOCKET NO. 080409-EG
Conservation Goals)
Tampa Electric Company)
_____)

In re: Commission Review of Numeric) DOCKET NO. 080410-EG
Conservation Goals)
Gulf Power Company)
_____)

In re: Commission Review of Numeric) DOCKET NO. 080411-EG
Conservation Goals)
Florida Public Utilities Company)
_____)

In re: Commission Review of Numeric) DOCKET NO. 080412-EG
Conservation Goals)
Orlando Utilities Commission)
_____)

In re: Commission Review of Numeric) DOCKET NO. 080413-EG
Conservation Goals)
Jacksonville Electric Authority)
_____)

NOTICE OF SERVICE OF
INTERVENORS NATURAL RESOURCES DEFENSE COUNCIL AND
SOUTHERN ALLIANCE FOR CLEAN ENERGY, INC.
OBJECTIONS AND RESPONSES TO GULF POWER COMPANY'S
FIRST REQUEST FOR PRODUCTION OF DUCUMENTS (NOS 1-4)

NOTICE IS HEREBY GIVEN that Intervenor, the Natural Resources Defense Council and the Southern Alliance for Clean Energy, Inc., by and through their undersigned attorney, have on the 30th day of July, 2009, hereby submit their Objections and Responses to Gulf

DOCUMENT NUMBER - DATE

07833 JUL 30 8

FPSC-COMMISSION CLERK

Power Company's First Request for Production of Documents (Nos. 1-4) to Gulf Power Company.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy and correct copy of the foregoing was served on this 30th day of July, 2009 via email (*) and/or US Mail on:

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|--|---|
| <p>Katherine Fleming, Esq. * Erik L. Slayer, Esq. * Florida Public Service Commission Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 <u>KEFLEMIN@PSC.STATE.FL.US</u> <u>esayler@PSC.STATE.FL.US</u></p> | <p>J.R. Kelly / Stephen Burgess * Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 <u>kelly.jr@leg.state.fl.us</u></p> |
| <p>Jack Leon, Esq., * Wade Litchfield, Esq. * Florida Power & Light Company 215 S. Monroe Street, Suite 810 Tallahassee, Florida 32301-1859 <u>Jack.Leon@fpl.com</u> <u>Wade.Litchfield@fpl.com</u></p> | <p>Mr. Paul Lewis, Jr. * Progress Energy Florida 106 East College Avenue, Suite 800 Tallahassee, FL 32301-7740 <u>paul.lewisjr@pgnmail.com</u></p> |
| <p>John T. Burnett / R. Alexander Glenn * Progress Energy Service Company, LLC Post Office Box 14042 St. Petersburg, FL 33733-4042 <u>john.burnett@pgnmail.com</u></p> | <p>Paula K. Brown * Tampa Electric Company Regulatory Affairs P. O. Box 111 Tampa, FL 33601-0111 <u>regdept@tecoenergy.com</u></p> |
| <p>Susan D. Ritenour * Gulf Power Company One Energy Place Pensacola, FL 32520-0780 <u>sdriteno@southernco.com</u></p> | <p>John T. English Florida Public Utilities Company P. O. Box 3395 West Palm Beach, FL 33402-3395</p> |
| <p>Chris Browder * Orlando Utilities Commission P. O. Box 3193 Orlando, FL 32802-3193 <u>cbrowder@ouc.com</u></p> | <p>Teala M. Milton * JEA V.P., Government Relations 21 West Church Street, Tower 16 Jacksonville, FL 32202-3158 <u>milta@jea.com</u></p> |
| <p>Suzanne Brownless, Esq. * 1975 Buford Boulevard Tallahassee, FL 32308 <u>suzannebrownless@comcast.net</u></p> <p>James D. Beasley, Esq., * Lee L. Willis, Esq. * Ausley Law Firm PO Box 391</p> | <p>Jeremy Susac * Florida Energy Commission 600 South Calhoun Street, Suite 251 Tallahassee, FL 32399-001 <u>jeremy.susac@eog.myflorida.com</u></p> <p>Susan Clark, Esq. * Radey Law Firm 301 South Bronough Street, Suite 200 Tallahassee, FL 32301</p> |

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|--|--|
| <p>Tallahassee, FL 32302 jbeasley@ausley.com lwillis@ausley.com</p> <p>Steven R. Griffin, Esq. * Beggs and Lane Law Firm 501 Commendencia Street Pensacola, FL 32502 srg@beggslane.com</p> | <p>sclark@radeylaw.com</p> <p>Norman Horton, Jr., Esq. * Messer, Caparello and Self, P.A. 2618 Centennial Place Tallahassee, FL 32308 nhorton@lawfla.com</p> |
| <p>Charles A. Guyton Squire, Sanders & Dempsey, LLP 215 South Monroe Street, Suite 601 Tallahassee, FL 32301</p> | <p>Roy C. Young/Tasha O. Buford Young Law Firm 225 S. Adams Street, Suite 200 Orlando, Florida 32802</p> |
| <p>Jon C. Moyle, Esq. Vicki Gordon Kaufman, Esq. Keefe, Anchors, Gordon & Moyle, P.A. 118 N. Gadsden St. Tallahassee, Florida 32301</p> | <p>Jessica Cano, Esq. Florida Power & Light 700 Universe Blvd Juno Beach, Fl 33048</p> |

This 30th day of July, 2009.

/s/ E. Leon Jacobs, Jr.

E. Leon Jacobs, Jr.
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