

**Dorothy Menasco**

---

**From:** Lee, David [David.Lee@fpl.com]  
**Sent:** Monday, July 11, 2011 2:07 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Anderson, Bryan; Cano, Jessica; Leon, Jack  
**Subject:** FPL's Notice of Service of Objections to OPC's 9th Set of Interrogatories (Nos. 87-89) and 12th Request for Production of Documents (Nos. 89-90)- Docket No. 110009-EI  
**Attachments:** FPL's Notice of Service of Objections to OPC's 9th INTs (Nos. 87-89) & 12th PODs (Nos. 89-90)\_07-11-11.pdf

**Electronic Filing****a.** Person responsible for this electronic filing:

David M. Lee, Esquire  
Florida Power & Light Company  
700 Universe Blvd.  
Juno Beach, FL 33408  
Office: (561) 691-7107  
[david.lee@fpl.com](mailto:david.lee@fpl.com)

**b.** Docket No. 110009-EI  
In re: Nuclear Power Plant  
Cost Recovery Clause

**c.** Documents are being filed on behalf of Florida Power & Light Company.

**d.** There are a total of 3 pages in the attached document.

**e.** The document attached for electronic filing is Florida Power & Light Company's Notice of Service of Objections to OPC's 9th Set of Interrogatories (Nos. 87-89) and 12th Request for Production of Documents (Nos. 89-90).

Thank you for your attention and cooperation to this request.

David M. Lee  
Attorney  
Florida Power & Light Company  
Law Department  
700 Universe Blvd.  
Juno Beach, FL 33408  
Office: (561) 691-7107  
Fax: (561) 691-7103  
[david.lee@fpl.com](mailto:david.lee@fpl.com)

---

7/11/2011

DOCUMENT NUMBER-DATE  
04755 JUL 11 =  
FPSC-COMMISSION CLERK

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Nuclear Power Plant    )  
Cost Recovery Clause        )

Docket No. 110009-EI  
Date Filed: July 11, 2011

**NOTICE OF SERVICE OF FLORIDA POWER & LIGHT COMPANY'S  
OBJECTIONS TO THE OFFICE OF PUBLIC COUNSEL'S  
NINTH SET OF INTERROGATORIES (NOS. 87-89) AND  
TWELFTH REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 89-90)**

Florida Power & Light Company gives notice of service of its Objections to the Office of Public Counsel's Ninth Set of Interrogatories (Nos. 87-89) and Twelfth Request for Production of Documents (Nos. 89-90), to Joseph McGlothlin.

Respectfully submitted this 11th day of July, 2011.

Bryan S. Anderson  
Jessica A. Cano  
Attorneys for Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
(561) 304-5226  
(561) 691-7135 (fax)

By: s/ Jessica A. Cano  
Jessica A. Cano  
Florida Bar No. 0037372

DOCUMENT NUMBER - DATE

04755 JUL 11 =

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 110009-EI**

I HEREBY CERTIFY that a true and correct copy of FPL's Notice of Service of Objections to OPC's Ninth Set of Interrogatories and Twelfth Request for Production of Documents was served electronically and by U.S. mail this 11th day of July, 2011 to the following:

Anna Williams, Esq.  
Keino Young, Esq.  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850  
[anwillia@psc.state.fl.us](mailto:anwillia@psc.state.fl.us)  
[kyoung@psc.state.fl.us](mailto:kyoung@psc.state.fl.us)

J. R. Kelly, Esq.  
Charles Rehwinkel, Esq.  
Joseph McGlothlin  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399  
[Kelly.jr@leg.state.fl.us](mailto:Kelly.jr@leg.state.fl.us)  
[Rehwinkel.Charles@leg.state.fl.us](mailto:Rehwinkel.Charles@leg.state.fl.us)  
[mcglothlin.joseph@leg.state.fl.us](mailto:mcglothlin.joseph@leg.state.fl.us)

J. Michael Walls, Esq.  
Blaise Huhta, Esq.  
Carlton Fields Law Firm  
P.O. Box 3239  
Tampa, Florida 33601-3239  
[mwalls@carltonfields.com](mailto:mwalls@carltonfields.com)  
[bhuhta@carltonfields.com](mailto:bhuhta@carltonfields.com)  
Attorneys for Progress

R. Alexander Glenn, Esq.  
John T. Burnett, Esq.  
Progress Energy Service Company, LLC  
P.O. Box 14042  
St. Petersburg, Florida 33733-4042  
[john.burnett@pgnmail.com](mailto:john.burnett@pgnmail.com)  
[alex.glenn@pgnmail.com](mailto:alex.glenn@pgnmail.com)  
Attorneys for Progress

Matthew Bernier  
Carlton Fields Law Firm  
215 S. Monroe Street, Ste. 500  
Tallahassee, Florida 32301  
[mbernier@carltonfields.com](mailto:mbernier@carltonfields.com)

Mr. Paul Lewis, Jr.  
106 East College Ave., Suite 800  
Tallahassee, Florida 32301-7740  
[paul.lewisjr@pgnmail.com](mailto:paul.lewisjr@pgnmail.com)

Jon C. Moyle, Jr., Esq.  
Vicki Gordon Kaufman, Esq.  
Keefe Anchors Gordon & Moyle, PA  
118 North Gadsden Street  
Tallahassee, Florida 32301  
[vkaufman@kagmlaw.com](mailto:vkaufman@kagmlaw.com)  
[jmoyle@kagmlaw.com](mailto:jmoyle@kagmlaw.com)  
Attorneys for FIPUG

James W. Brew, Esq.  
F. Alvin Taylor, Esq.  
Brickfield, Burchette, Ritts & Stone, P.C.  
1025 Thomas Jefferson Street, NW  
Eighth Floor, West Tower  
Washington, DC 20007-5201  
[jbrew@bbrslaw.com](mailto:jbrew@bbrslaw.com)  
[ataylor@bbrslaw.com](mailto:ataylor@bbrslaw.com)  
Attorneys for PCS Phosphate

Randy B. Miller  
White Springs Agricultural Chemicals, Inc.  
Post Office Box 300  
15843 Southeast 78th Street  
White Springs, Florida 32096  
[RMiller@pcsphosphate.com](mailto:RMiller@pcsphosphate.com)

Karen S. White  
AFCESA/ULFSC  
139 Barnes Drive, Suite 1  
Tyndall AFB FL 32403-5319  
[karen.white@tyndall.af.mil](mailto:karen.white@tyndall.af.mil)

Gary A. Davis, Esq.  
James S. Whitlock, Esq.  
Gary A. Davis & Associates  
61 North Andrews Avenue  
PO Box 649  
Hot Springs, NC 28743  
[gadavis@enviroattorney.com](mailto:gadavis@enviroattorney.com)  
[jwhitlock@enviroattorney.com](mailto:jwhitlock@enviroattorney.com)  
Attorneys for SACE

By: s/ Jessica A. Cano  
Jessica A. Cano  
Florida Bar No. 0037372