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FPL's Response to FIT's Second Request for Production of Documents Nos. 16-17.

20210015.EI Staff Hearing Exhibits 00840

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QUESTION:

In Your Status Report/Update dated March 3, 2008 and filed June 1, 2008 in PSC Dockets 060198-EI, 060078-EI, in Section 5.1.2, You reported that in pole attributes collected via pole inspections are populated in FPL's GIS, including "Pole Height" and "Class." Please produce documents reflecting Pole Height and Class for each and every pole in FPL's GIS as of year-end for the years 2018, 2019, 2020, and for 2021 as of June 30, 2021.

RESPONSE:

Please see FPL's specific objection to this request served on July 19, 2021 and general objections served contemporaneously with this response.

Notwithstanding objection, FPL and Gulf's GIS does not have the information for the dates requested.

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QUESTION:

Please produce documents reflecting Pole Height and Class for each and every pole in Gulf Power's GIS as of year-end for the years 2018, 2019, 2020, and for 2021 as of June 30, 2021.

RESPONSE:

See FPL's specific objection to this request served on July 19, 2021 and general objections served contemporaneously with this response.

Notwithstanding this objection, please refer to FPL's response to FIT's Second Request for Production of Documents, No. 16.