

Timolyn Henry

From: Jack_Leon@fpl.com
Sent: Friday, February 18, 2005 4:20 PM
To: Filings@psc.state.fl.us
Cc: Wade_Litchfield@fpl.com; Natalie_Smith@fpl.com; John_Hepokoski@fpl.com; Lynne_Adams@fpl.com; Nanci_Nesmith@fpl.com; Bill_Feaster@fpl.com; Sabrina_Spradley@fpl.com
Subject: Electronic Filing for Docket No. 041291 / FPL's Notice of Serving objections and updated answers to Staff's First Set of Interrogatories (Nos. 5, 11, 12 & 15); Staff's Second Set of Interrogatories (No. 17); OPC's First Set of Interrogatories (Nos. 2,

Attachments: FPL's Notice of Serving Objections and Updated Answers to Discovery 2-18-05.doc

CMP _____
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ECR _____
GCL _____
OPC _____
MMS _____
RCA _____
SCR _____
SEC 1
OTH _____



FPL's Notice of serving Object..

Electronic Filing

a. Person responsible for this electronic filing:
Joaquin E. Leon, Esq.
9250 W. Flagler St., Suite 6514
Miami, FL 33174
(305) 552-3922
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b. Docket No. 041291
In re: Petition for authority to recover prudently incurred storm restoration costs related to 2004 storm season that exceed storm reserve balance, by Florida Power & Light Company.

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

d. There are a total of 2 pages in the attached document.

e. The document attached for electronic filing is Florida Power & Light Company's Notice of Serving objections and updated answers to Staff's First Set of Interrogatories (Nos. 5, 11, 12 & 15); Staff's Second Set of Interrogatories (No. 17); OPC's First Set of Interrogatories (Nos. 2, 6 & 10); OPC's Fourth Set of Interrogatories (No. 31); OPC's First Request for Production of Documents (No. 1); and the Florida Industrial Power Users Group's First Set of Interrogatories (No. 3).

(See attached file: FPL's Notice of Serving Objections and Updated Answers to Discovery 2-18-05.doc)

Thank you for your attention and cooperation to this request.

Jack Leon
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DOCUMENT NUMBER - DATE
01725 FEB 18 05
FPLSC-COMMUNICATIONS

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for authority to recover prudently)	Docket No. 041291-El
incurred storm restoration costs related to 2004)	
storm season that exceed storm reserve balance,)	
by Florida Power & Light Company.)	Filed: February 18, 2005

**FLORIDA POWER & LIGHT COMPANY’S NOTICE OF SERVING
 OBJECTIONS AND UPDATED ANSWERS TO STAFF’S FIRST SET OF
 INTERROGATORIES (NOS. 5, 11, 12 & 15); STAFF’S SECOND SET OF
 INTERROGATORIES (NO. 17); THE OFFICE OF PUBLIC COUNSEL’S FIRST
 SET OF INTERROGATORIES (NOS. 2, 6 & 10); THE OFFICE OF PUBLIC
 COUNSEL’S FOURTH SET OF INTERROGATORIES (NO. 31); THE OFFICE
 OF PUBLIC COUNSEL’S FIRST REQUEST FOR PRODUCTION OF
 DOCUMENTS (NO. 1); AND THE FLORIDA INDUSTRIAL POWER USERS
 GROUP’S FIRST SET OF INTERROGATORIES (NO. 3)**

Florida Power & Light Company hereby gives notice of serving its objections and updated answers to Staff’s First Set of Interrogatories (Nos. 5, 11, 12 & 15); Staff’s Second Set of Interrogatories (No. 17); the Office of Public Counsel’s (“OPC’s”) First Set of Interrogatories (Nos. 2, 6 & 10); OPC’s Fourth Set of Interrogatories (No. 31); OPC’s First Request for Production of Documents (No. 1); and the Florida Industrial Power Users Group’s (“FIPUG’s”) First Set of Interrogatories (No. 3), to Katherine E. Fleming, Esq., Patricia A. Christensen, Esq., and Timothy J. Perry, Esq., with copies to parties of record.

Respectfully submitted this 18th day of February, 2005.

R. Wade Litchfield, Esq.
 Natalie F. Smith, Esq.
 Florida Power & Light Company
 700 Universe Boulevard
 Juno Beach, FL 33408
 Telephone: (561) 691-7207
 Facsimile: (561) 691-7135

By: s/ Natalie F. Smith
 Natalie F. Smith, Esq.
 Fla. Bar No. 470200

DOCUMENT NUMBER-DATE

01725 FEB 18 05

FILED - COMMUNICATIONS SECTION

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Notice of Serving its objections and updated answers to Staff's First Set of Interrogatories (Nos. 5, 11, 12 & 15); Staff's Second Set of Interrogatories (No. 17); the Office of Public Counsel's ("OPC's") First Set of Interrogatories (Nos. 2, 6 & 10); OPC's Fourth Set of Interrogatories (No. 31); OPC's First Request for Production of Documents (No. 1); and the Florida Industrial Power Users Group's ("FIPUG's") First Set of Interrogatories (No. 3), have been furnished electronically and by United States Mail this 18th day of February, 2005, to the following:

Wm. Cochran Keating, IV, Esq.
Katherine E. Fleming, Esq.
Florida Public Service Commission
Gerald L. Gunter Building
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Harold McLean, Esq.
Patricia A. Christensen, Esq.
Joseph A. McGlothlin, Esq.
Office of Public Counsel
The Florida Legislature
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Tallahassee, FL 32314-5256
Attorney for Thomas P. Twomey and Genevieve E. Twomey

By: s/ Natalie F. Smith
Natalie F. Smith, Esq.
Fla. Bar No. 470200