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Timolyn Henry\*\*\*\*\*1

## **Timolyn Henry**

Fı	om:
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Hayes, Annisha [AnnishaHayes@andrewskurth.com]

Sent:

Friday, August 05, 2005 2:54 PM

To:

Filings@psc.state.fl.us

Subject:

Notice of Service of SFHHA Objections & Response to FPL Second Request for Prod. of

Documents and Second Set of Interogatories

Attachments:

SFHHA Notice of Service of Objections & Responses to FPL 2nd Request for POD & RFI.doc

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SFHHA Notice Service of Obj.

Electronic Filing

a. Person responsible for this electronic filing:

George E. Humphrey

Florida Reg. No. 0007943 Andrews & Kurth, LLP

600 Travis, Suite 4200 Houston, Texas 77002-3092

- b. Docket No. 050045-EI & 050188-EI
- c. Document being filed on behalf of South Florida Hospitals and Healthcare Association (SFHHA).
- d. There is a total of 3 pages.

e. The document attached	for electronic filing is Notice of Service of Sou	th Morida
Hospitals and Healthcare	Association's Objections and Responses to Florida	Power and Light
Company's Second Request	for Production of Documents (Nos 10-27) and Secon	d set of
Interrogatories (Nos. 24		CTR
/Con absorbed CRITIN Notice	as of Commiss of Objections C Demonstra to EDI Oct	B 5- BOD

(See attached SFHHA Notice of Service of Objections & Responses to FPL 2nd Recrest for POD & RFI.doc)

Thank you for your attention and cooperation to this request.

Regalus.	
Annisha Hayes	RCA
AndrewsKurth, LLP	
1701 Pennsylvania Avenue, N.W.	SCR
Suite 300	
Washington, D.C. 20006	SGA
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attachments for any purpose, nor disclose all or any part of its contents to any other person. Thank you.

Treasury Circular 230 Disclosure - To comply with requirements imposed by the Internal Revenue Service, we inform you that any tax advice contained in this written communication (including any attachment) is not intended or written to be used, and cannot be used, by any person for the purpose of avoiding tax penalties that may be imposed on the person. If this written communication contains any tax advice that is used or referred to in connection with the promoting, marketing or recommending of any transaction(s) or matter(s), this written communication should be construed as written to support the promoting, marketing or recommending of the transaction(s) or matter(s) addressed by this written communication, and the taxpayer should seek advice based on the taxpayer's particular circumstances from an independent tax advisor. No limitation has been imposed by Andrews Kurth LLP on disclosure of the tax treatment or tax structure of the transaction(s) or matter(s).

ORIGINAL

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida **Docket No.: 050045-EI** 999999

Power & Light Company

n re: 2005 comprehensive depreciation **Docket No.: 050188-EI** 

Study by Florida Power & Light Company Filed: August 5, 2005

## NOTICE OF SERVICE OF SOUTH FLORIDA HOSPITALS AND HEALTHCARE ASSOCIATION'S OBJECTIONS AND RESPONSES TO FLORIDA POWER & LIGHT COMPANY'S **SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 10-27)** AND SECOND SET OF INTERROGATORIES (NOS. 24-46)

South Florida Hospitals and Healthcare Association ("SFHHA") gives notice of service of its Objections and Responses to Florida Power & Light Company's Second Request for Production of Documents (Nos. 10-27) and Second Set of Interrogatories (Nos. 24-46) with a copy to all counsel on the attached Certificate of Service.

Respectfully submitted this 5th day of August, 2005.

Mark F. Sundback Kenneth L. Wiseman Andrews & Kurth L.L.P. 1701 Pennsylvania Avenue, N.W. Suite 300 Washington, D.C. 20006 Ph. (202) 662-3030 Fax. (202) 662-2739

/s/ George E. Humphrey George E. Humphrey Florida Reg. No. 0007943 Andrews & Kurth L.L.P. 600 Travis, Suite 4200 Houston, Texas 77002-3090 Ph. (713) 220-4200 Fax. (713) 220-4285

Attorneys for the Hospitals and SFHHA

DOCUMENT NUMBER-DATE

07596 AUG-58

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail to the following parties of record and interested parties, this 5<sup>th</sup> day of August, 2005.

Florida Industrial Power Users Group John W. McWhirter, Jr. c/o McWhirter Reeves 400 North Tampa Street, Suite 2450 Tampa, FL 33601-3350 Florida Power & Light Company Mr. Bill Walker 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1859

AARP c/o Mike B. Twomey P. O. Box 5256 Tallahassee, FL 32314-5256 Commercial Group David Brown c/o McKenna Law Firm One Peachtree Center 303 Peachtree Street, N.E., Suite 5300 Atlanta, GA 30308

Florida Power & Light Company R. Wade Litchfield/Natalie F. Smith Richard A. DuRose Bryan S. Anderson Mitchell S. Ross 700 Universe Blvd. Juno Beach, Florida 33408-0420 Federal Executive Agencies Major Craig Paulson c/o AFCESA/ULT 139 Barnes Drive Tyndall Air Force Base, FL 32403

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Jack Leon Florida Power & Light 9250 W. Flagler Street Suite 6514 Miami, FL 33174 Wm Cochran Keating, IV Esquire Katherine E. Flemming, Esquire Jeremy Susac, Esquire Florida Public Service Commission Division of Legal Services Gerald L. Gunter Building 2540 Shumard Oak Blvd. Tallahasee, FL 32399-0850

Susan F. Clark Radey Thomas Yon & Clark, PA 301 South Bronough Street Suite 200 Tallahassee, FL 32301

/s/ George E. Humphrey
George E. Humphrey