

**ORIGINAL**

**Timolyn Henry**

**From:** Simms, Patrice [psimms@nrdc.org]  
**Sent:** Tuesday, December 12, 2006 4:59 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Suzanne Brownless; gary perko; Jennifer Brubaker; carolyn raepple; leon jacobs; brett paben; Katherine Fleming; Armstrong, Brian  
**Subject:** RE: NRDC's Second Set of Interrogatories Nos. 1-8  
**Attachments:** Second NRDC Interrogatories.doc; Second NRDC Interrogatories Questions.doc

Attached please find NRDC's Second set of Interrogatories Nos. 1-8. Hard copies will follow by U.S. Mail. Should you have any questions or need any additional information, please contact me.

a. Person responsible for filing:

Patrice L. Simms  
 Natural Resources Defense Council  
 1200 New York Ave. NW, Suite 400  
 Washington, DC 20005  
 202 289-2437 (fax 202 289 1060)  
 psimms@nrdc.org

b. Docket No. 060635-EU

c. Document filed on behalf of National Resources Defense Council

d. Document 1 = 2 pages; document 2 = 7 pages.

e. The document attached is: Notice of Service of NRDC's second Set of Interrogatories to Florida Municipal Power Agency, JEA, Reedy Creek Improvement District and City of Tallahassee Nos. 1-26. document 2 = Inerrogatories 1-8.

Thanks,

**CMP** \_\_\_\_\_ **CONFIDENTIALITY NOTICE**

This communication and its attachments, if any, is intended only for the individual or entity to which it is addressed. It may contain information that is confidential and privileged. If you are not the intended recipient, you are notified that any dissemination, distribution, or other use of this communication or other use of a transmission received in error is strictly prohibited. If you have received this transmission in error, please notify me immediately at the telephone number appearing above.

**COM** \_\_\_\_\_

**CTR** \_\_\_\_\_

**ECR** \_\_\_\_\_

**GCL** \_\_\_\_\_

**OPC** \_\_\_\_\_

**RCA** \_\_\_\_\_

**SCR** \_\_\_\_\_

**SGA** \_\_\_\_\_

**SEC**   J  

**OTH** \_\_\_\_\_

DOCUMENT NUMBER-DATE.

11366 DEC 12 8

FPSC-COMMISSION CLERK

12/12/2006

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Petition for Determination of Need for  
electrical power plant in Taylor County by  
Florida Municipal Power Agency, JEA,  
Reedy Creek Improvement District, and the  
City of Tallahassee.

DOCKET NO. 060635-EU  
Filed: December 12, 2006

---

**NOTICE OF SERVICE OF NRDC'S SECOND SET OF INTERROGATORIES TO FLORIDA  
MUNICIPAL POWER AGENCY, JEA, REEDY CREEK IMPROVEMENT DISTRICT  
AND CITY OF TALLAHASSEE (NOS. 1-8)**

The National Resources Defense Council (NRDC) hereby gives notice of its service by electronic and U. S. Mail, postage prepaid, of its Second Set of Interrogatories to Florida Municipal Power Agency, Jea, Reedy Creek Improvement District And City of Tallahassee (Nos. 1-8 ) on this 12th day of December, 2006.

Respectfully submitted this 11th day of December, 2006 by:

/s/ Patrice Simms  
Patrice L. Simms, Esq.  
Natural Resources Defense Council  
1200 New York Avenue, N.W. Suite 400  
Washington, DC 20005  
Phone: (202) 289-2437  
FAX: (202) 289-1060

Suzanne Brownless, Esq.  
Fla. Bar No. 309591  
Suzanne Brownless, P.A.  
1975 Buford Blvd.  
Tallahassee, FL 32308  
Phone: (850) 877-5200  
FAX: (850) 878-0090

Attorneys for NRDC

c: 5675.doc

DOCUMENT NUMBER-DATE  
11366 DEC 12 06  
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been provided by electronic mail as listed and U.S. Mail, this 12th day of December, 2006 to the following:

Gary V. Perko, Esq.  
Carolyn S. Raepple, Esq.  
Hopping Law Firm  
P.O. Box 6526  
Tallahassee, FL 32314-6526  
[Gperko@hgslaw.com](mailto:Gperko@hgslaw.com)  
[Craepple@hgslaw.com](mailto:Craepple@hgslaw.com)

Brian P. Armstrong, Esq.  
7025 Lake Basin Road  
Tallahassee, FL 32312  
[barmstrong@ngn-tally.com](mailto:barmstrong@ngn-tally.com)

E. Leon Jacobs, Esq.  
Williams & Jacobs  
1720 South Gadsden Street, MS 14, Suite 201  
Tallahassee, FL 32302  
[ljacobs50@comcast.net](mailto:ljacobs50@comcast.net)

Jeanne Zokovitch Paben, Sr. Staff Attorney  
Brett M. Paben, Sr. Staff Attorney  
WildLaw  
1415 Devils Dip  
Tallahassee, FL 32308-5140  
[jeanne@wildlaw.org](mailto:jeanne@wildlaw.org)

Valerie Hubbard, Director  
Department of Community Affairs  
Division of Community Planning  
2555 Shumard Oak Blvd.  
Tallahassee, FL 32399-2100  
[Valerie.Hubbard@dca.state.fl.us](mailto:Valerie.Hubbard@dca.state.fl.us)

Buck Oven  
Michael P. Halpin  
Department of Environmental Regulation  
Siting Coordination Office  
2600 Blairstone Road MS 48  
Tallahassee, FL 32301  
[Hamilton.Oven@dep.state.fl.us](mailto:Hamilton.Oven@dep.state.fl.us)  
[Michael.Halpin@dep.state.fl.us](mailto:Michael.Halpin@dep.state.fl.us)

Harold A. McLean  
Office of the Public Counsel  
111 West Madison Street, Room 812  
Tallahassee, FL 32399  
[hallmc@earthlink.net](mailto:hallmc@earthlink.net)

Jennifer Brubaker, Esq.  
Katherine Fleming, Esq.  
Legal Division  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

\_\_\_\_\_/s/\_\_\_\_\_  
Patrice L. Simms  
Natural Resources Defense Council  
1200 New York Ave., YW, Suite 400  
Washington, DC 20005  
[psimms@nrdc.org](mailto:psimms@nrdc.org)