

**Ruth Nettles**

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**From:** Al Taylor [Al.Taylor@bbrslaw.com]  
**Sent:** Wednesday, January 09, 2008 3:23 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Rich Zambo; Wade\_Litchfield@fpl.com; Karin Torain; bryan\_anderson@fpl.com; jmoylerjr@moylslaw.com; lwillis@ausley.com; jbeasley@ausley.com; Susan F. Clark; Iscoles@radeylaw.com; Paula K. Brown; David.McCary@tampagov.net; John T. Burnett; paul.lewisjr@pgnmail.com; Karin Torain; Jay Brew  
**Subject:** FPSC Dockets 070234 / 070235 / 070236 - E-filing of Notice of Service to PEF  
**Attachments:** PCS Notice of Service of 1st PEF Responses.pdf

Electronic Filing

- a. Person Responsible for Filing - James W. Brew, Brickfield, Burchette, Ritts & Stone, P.C., 1025 Thomas Jefferson Street, N.W., Washington, D.C. 20007, [jay.brew@bbrslaw.com](mailto:jay.brew@bbrslaw.com) is the person responsible for this electronic filing.
  - b. Dockets - The filing is to be made in Docket Nos. 070234-EQ, 070235-EQ and 070236-EQ.
  - c. The filing is made on behalf of White Springs Agricultural Chemicals, Inc., d/b/a PCS Phosphate-White Springs.
  - d. The total number of pages is 3.
- E. The document attached for electronic filing is the Notice of Service of White Springs Agricultural Chemicals, Inc. d/b/a PCS Phosphate – White Springs’ Objections and Responses to Progress Energy Florida, Inc.’s First Request for Admissions, First Request for Production of Documents, and First Set of Interrogatories

(see attached file: PCS Notice of Service of 1st PEF Responses.doc )

F. Alvin Taylor  
BRICKFIELD BURCHETTE RITTS & STONE, PC  
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DOCUMENT NUMBER-DATE

00245 JAN-9 8

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for approval of renewable energy tariff standard offer contract, by Florida Power and Light Company

DOCKET NO. 070234-EQ

In re: Petition for approval of standard offer contract for purchase of firm capacity and energy from renewable energy producer or qualifying facility less than 100kW tariff, by Progress Energy Florida, Inc.

DOCKET NO. 070235-EQ

In re: Petition for approval of standard offer contract for small qualifying facilities and producers of renewable energy, by Tampa Electric Company.

DOCKET NO. 070236-EQ

**Dated: January 9, 2008**

**NOTICE OF SERVICE OF  
WHITE SPRINGS AGRICULTURAL CHEMICALS, INC.  
d/b/a PCS PHOSPHATE – WHITE SPRINGS’ OBJECTIONS AND RESPONSES TO  
PROGRESS ENERGY FLORIDA, INC.’S  
FIRST REQUEST FOR ADMISSIONS, FIRST REQUEST FOR PRODUCTION OF  
DOCUMENTS, AND FIRST SET OF INTERROGATORIES**

White Springs Agricultural Chemical, Inc. d/b/a PCS Phosphate-White Spring files notice that it has served its Objections and Responses to Progress Energy Florida, Inc.’s First Request for Admissions, First Request for Production of Documents, and First Set of Interrogatories by Electronic Mail and by U.S. Mail to: (i) Susan F. Clark and Lisa C. Scoles, Radey Thomas Yon & Clark, 301 S. Bronough Street, Suite 200, Tallahassee, Florida 32301, [sclark@radeylaw.com](mailto:sclark@radeylaw.com) and [lscoles@radeylaw.com](mailto:lscoles@radeylaw.com) respectively, (ii) Paul Lewis, Jr., Progress Energy Florida, Inc., 106 East College Avenue, Suite 800, Tallahassee, Florida 32301-7740, [paul.lewisjr@pgnmail.com](mailto:paul.lewisjr@pgnmail.com), and (iii) John T. Burnett, Progress Energy Service Company, LLC, P.O. Box 14042, Saint Petersburg, Florida 33733-4042, [john.burnett@pgnmail.com](mailto:john.burnett@pgnmail.com), on this 9th day of January 2008.

DOCUMENT NUMBER-DATE

00245 JAN-9 8

FPSC-COMMISSION CLERK

Respectfully submitted,

s/ James W. Brew  
James W. Brew, Esq.  
F. Alvin Taylor  
Brickfield, Burchette, Ritts & Stone, P.C.  
1025 Thomas Jefferson Street, NW  
Eighth Floor, West Tower  
Washington, DC 20007-5201

*Attorney for  
White Springs Agricultural Chemicals, Inc.  
d/b/a PCS Phosphate – White Springs*

## CERTIFICATE OF SERVICE

**I CERTIFY** that a true and correct copy of the foregoing has been furnished by

Electronic Mail and/or U.S. Mail this 9th day of January 2008, to the following:

Florida Industrial Cogeneration Ass'n c/o Richard Zambo 2336 S. East Ocean Blvd., #309 Stuart, Florida, 34996 <a href="mailto:richzambo@aol.com">richzambo@aol.com</a>	Wade Litchfield FPL 215 S. Monroe St., Suite 810 Tallahassee, Florida 32301-1859 <a href="mailto:wade_litchfield@fpl.com">wade_litchfield@fpl.com</a>
Karin S. Torain PCS Administration (USA), Inc. Suite 400 1101 Skokie Boulevard Northbrook, Illinois 60062 <a href="mailto:KSTorain@Potashcorp.com">KSTorain@Potashcorp.com</a>	Bryan S. Anderson FPL 700 Universe Blvd. Juno Beach, Florida, 33408-0420 <a href="mailto:bryan_anderson@fpl.com">bryan_anderson@fpl.com</a>
Jon C. Moyle, Jr. Moyle, Flanigan, Katz, Brenton, White & Krasker, P.A. 118 North Gadsden Street Tallahassee, Florida 32301 <a href="mailto:jmoylejr@moylelaw.com">jmoylejr@moylelaw.com</a>	Lee L. Willis James D. Beasley Ausley Law Firm P.O. Box 391 Tallahassee, Florida, 32302 <a href="mailto:lwillis@ausley.com">lwillis@ausley.com</a> / <a href="mailto:jbeasley@ausley.com">jbeasley@ausley.com</a>
Susan F. Clark / Lisa C. Scoles Radey Thomas Yon & Clark 301 S. Bronough Street, Suite 200 Tallahassee, Florida, 32301 <a href="mailto:sclark@radeylaw.com">sclark@radeylaw.com</a> / <a href="mailto:lscoles@radeylaw.com">lscoles@radeylaw.com</a>	Paula K. Brown Tampa Electric Company Regulatory Affairs P.O. Box 111 Tampa, Florida 33601-0111 <a href="mailto:Regdept@tecoenergy.com">Regdept@tecoenergy.com</a>
John T. Burnett Progress Energy Service Company, LLC P.O. Box 14042 Saint Petersburg, FL 33733-4042 Phone: 727-820-5587 FAX: 727-820-5519 <a href="mailto:john.burnett@pgnmail.com">john.burnett@pgnmail.com</a>	Paul Lewis, Jr. Progress Energy Florida, Inc. 106 East College Avenue, Suite 800 Tallahassee, FL 32301-7740 Phone: (850) 222-8738 FAX: 222-9768 <a href="mailto:paul.lewisjr@pgnmail.com">paul.lewisjr@pgnmail.com</a>
David W. McCary, Director City of Tampa / Department of Solid Waste 4010 West Spruce Street Tampa, FL 33607 <a href="mailto:David.McCary@tampagov.net">David.McCary@tampagov.net</a>	

s/ James W. Brew \_\_\_\_\_

James W. Brew