

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and purchase power cost recovery
clause with generating performance incentive
factor

Docket No: 140001-EI
Date: August 15, 2014

**FLORIDA POWER & LIGHT COMPANY'S SUPPLEMENT AND CORRECTION TO
OBJECTIONS TO THE OFFICE OF PUBLIC COUNSEL'S THIRD SET OF
INTERROGATORIES (NOS. 18-59) AND FOURTH REQUEST
FOR PRODUCTION OF DOCUMENTS (NOS. 5-28)**

Florida Power & Light Company ("FPL"), pursuant to Rules 1.340 and 1.350, Florida Rules of Civil Procedure, Rule 28-106.206, Florida Administrative Code, and Order No. PSC-14-0084-PCO-EI, submits the following Supplement and Correction to the Objections to the Office of Public Counsel's ("OPC's") Third Set of Interrogatories (Nos. 18-59) and Fourth Request for Production of Documents (Nos. 5-28) to Florida Power & Light Company that were filed and served by FPL on August 11, 2014 (the "August 11 Objections").

I. Supplemental Specific Objection

In addition to the Specific Objections identified in the August 11 Objections, FPL raises the following:

Third Set of Interrogatories (Nos. 18-59)

Interrogatories Nos. 42b, c, and d

FPL objects to Interrogatories Nos. 42b, c, and d on the grounds that they seek information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Further, to require any non-regulated entities to participate in irrelevant discovery is by its very nature unduly burdensome and overbroad. Moreover, FPL does not possess such information, and USG is not a party to this proceeding and has not joined in FPL's request for Commission approval of the transfer to FPL of USG's interest in the PetroQuest transaction. Rather, USG has agreed only to serve as a backstop for the PetroQuest transaction with FPL so

as to provide FPL and the Commission an opportunity to assess the benefits of investing in gas reserves. FPL has no insight into USG's hedging program, and any hedges placed by USG are not relevant to this proceeding.

II. Correction of Scrivener's Error in Specific Objections

Interrogatories Nos. 19, 24, 25, and Request for Production No. 27

FPL's August 11 Objections raised objections to OPC's Interrogatory Nos. 19, 24, and 25, and Request for Production No. 27, but stated that FPL nonetheless would respond to each of those Interrogatories on August 18, 2014. In its Third Set of Interrogatories to FPL and Fourth Request for Production to FPL, served on July 31, 2014, OPC requested responses within 20 days. Day 20 is August 21, 2014. Therefore, FPL will provide responses to those Interrogatories, consistent with its objections, on August 21, 2014 rather than August 18, 2014.

Respectfully submitted this 15th day of August 2014.

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By: s/ Scott A. Goorland
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CERTIFICATE OF SERVICE

Docket No. 140001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic service on this 15th day of August, 2014 to the following:

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