

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Florida Power & Light  
Company for Rate Unification and for Base  
Rate Increase

Docket No: 20210015-EI

Date: June 11, 2021

**FLORIDA POWER & LIGHT COMPANY'S NOTICE OF SERVICE OF OBJECTIONS  
AND RESPONSES TO THE CLEO INSTITUTE, INC. AND VOTE SOLAR'S FIRST  
SET OF INTERROGATORIES (NOS. 11, 12, 46 & 94) AND FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS (NO. 24)**

Florida Power & Light Company hereby gives notice of service of its objections and responses to the CLEO Institute, Inc. and Vote Solar's First Set of Interrogatories (Nos. 11, 12, 46 & 94) and First Request for Production of Documents (No. 24).

Respectfully submitted,

FLORIDA POWER & LIGHT COMPANY

By: /s/ R. Wade Litchfield

R. Wade Litchfield  
Vice President and General Counsel  
Authorized House Counsel No. 0062190  
wade.litchfield@fpl.com  
John T. Burnett  
Vice President and Deputy General Counsel  
Florida Bar No. 173304  
john.t.burnett@fpl.com  
Russell Badders  
Vice President and Associate General Counsel  
Florida Bar No. 007455  
russell.badders@nexteraenergy.com  
Maria Jose Moncada  
Senior Attorney  
Florida Bar No. 0773301  
maria.moncada@fpl.com  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
(561) 691-7101  
(561) 691-7135 (fax)

**CERTIFICATE OF SERVICE**  
**20210015-EI**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail this 11th day of June 2021 to the following parties:

Suzanne Brownless  
Bianca Lherisson  
Shaw Stiller  
Florida Public Service Commission  
Office of the General Counsel  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
sbrownle@psc.state.fl.us  
blheriss@psc.state.fl.us  
sstiller@psc.state.fl.us

Thomas A. Jernigan, GS-13, DAF AFIMSC/JA  
Holly L. Buchanan, Maj, USAF AF/JAOE-  
ULFSC  
Robert J. Friedman, Capt., USAF  
Arnold Braxton, TSgt, USAF  
Ebony M. Payton  
Scott L. Kirk, Maj, USAF  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base, Florida 32403  
ULFSC.Tyndall@us.af.mil  
thomas.jernigan.3@us.af.mil  
holly.buchanan.1@us.af.mil  
robert.friedman.5@us.af.mil  
arnold.braxton@us.af.mil  
ebony.payton.ctr@us.af.mil  
scott.kirk.2@us.af.mil  
**Attorneys for Federal Executive Agencies**

Office of Public Counsel  
Richard Gentry  
Patricia A. Christensen  
Anastacia Pirrello  
c/o The Florida Legislature  
111 W. Madison St., Rm 812  
Tallahassee FL 32399-1400  
gentry.richard@leg.state.fl.us  
christensen.patty@leg.state.fl.us  
pirrello.anastacia@leg.state.fl.us  
**Attorneys for the Citizens  
of the State of Florida**

Jon C. Moyle, Jr.  
Karen A. Putnal  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, Florida 32301  
jmoyle@moylelaw.com  
kputnal@moylelaw.com  
mqalls@moylelaw.com  
**Attorneys for Florida Industrial Power Users  
Group**

James W. Brew  
Laura Wynn Baker  
Joseph R. Briscar  
Stone Mattheis Xenopoulos & Brew, PC  
1025 Thomas Jefferson St, NW  
Suite 800 West  
Washington, D.C. 20007  
jbrew@smxblaw.com  
lwb@smxblaw.com  
jrb@smxblaw.com  
**Attorneys for Florida Retail Federation**

George Cavros  
Southern Alliance for Clean Energy  
120 E. Oakland Park Blvd., Suite 105  
Fort Lauderdale, Florida 33334  
george@cavros-law.com  
**Attorney for Southern Alliance for Clean  
Energy**

Nathan A. Skop, Esq.  
420 NW 50th Blvd.  
Gainesville, FL 32607  
n\_skop@hotmail.com  
**Attorney for Mr. & Mrs. Daniel R. Larson**

Bradley Marshall  
Jordan Luebke  
Earthjustice  
111 S. Martin Luther King Jr. Blvd.  
Tallahassee, Florida 32301  
bmarshall@earthjustice.org  
jluebke@earthjustice.org

Christina I. Reichert  
Earthjustice  
4500 Biscayne Blvd., Ste. 201  
Miami, FL 33137  
creichert@earthjustice.org  
flcaseupdates@earthjustice.org  
**Attorneys for Florida Rising, Inc.**  
**League of United Latin American Citizens of Florida**  
**Environmental Confederation of Southwest Florida, Inc.**

Katie Chiles Ottenweller  
Southeast Director  
Vote Solar  
838 Barton Woods Road  
Atlanta, GA 30307  
katie@votesolar.org  
**Attorney for Vote Solar**

Robert Scheffel Wright  
John T. LaVia, III  
Gardner, Bist, Bowden, Dee, LaVia, Wright & Perry, P.A.  
1300 Thomaswood Drive  
Tallahassee, Florida 32308  
schef@gbwlegal.com  
jlvia@gbwlegal.com  
**Attorneys for Floridians Against Increased Rates, Inc.**

William C. Garner  
Law Office of William C. Garner, PLLC  
3425 Bannerman Road  
Unit 105, #414  
Tallahassee, FL 32312  
bgarner@wcglawoffice.com  
**Attorney for The CLEO Institute Inc.**

Stephanie U. Eaton  
SPILMAN THOMAS & BATTLE, PLLC  
110 Oakwood Drive, Suite 500  
Winston-Salem, NC 27103  
seaton@spilmanlaw.com  
**Attorney for Walmart**

Barry A. Naum  
SPILMAN THOMAS & BATTLE, PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
bnaum@spilmanlaw.com  
**Attorney for Walmart**

By: /s/ R. Wade Litchfield  
R. Wade Litchfield  
Authorized House Counsel No. 0062190