

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and purchased power cost recovery clause  
with generating performance incentive factor.

Docket No.: 20230001-EI

Filed: June 5, 2023

**FLORIDA POWER & LIGHT COMPANY'S NOTICE OF SERVICE  
OF OBJECTIONS AND RESPONSES TO THE STAFF OF THE FLORIDA  
PUBLIC SERVICE COMMISSION'S THIRD SET OF INTERROGATORIES  
(Nos. 4-9) AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 1-2)**

Florida Power & Light Company hereby gives notice of service of its Objections and Responses to the Staff of the Florida Public Service Commission's Third Set of Interrogatories (Nos. 4-9) and First Request for Production of Documents (Nos. 1-2).

Respectfully submitted this 5th day of June 2023.

Respectfully submitted,

By: s/ Maria Jose Moncada

Maria Jose Moncada

Fla. Bar No. 0773301

David M. Lee

Florida Bar No. 103152

Florida Power & Light Company

700 Universe Boulevard

Juno Beach, Florida 33408-0420

Telephone: (561) 304-5795

Facsimile: (561) 691-7135

maria.moncada@fpl.com

david.lee@fpl.com

**CERTIFICATE OF SERVICE**  
**Docket No. 20230001-EI**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic service on this 5th day of June 2023 to the following:

Suzanne Brownless  
Ryan Sandy  
**Office of General Counsel**  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
sbrownle@psc.state.fl.us  
rsandy@psc.state.fl.us

Dianne M. Triplett  
299 First Avenue North  
St. Petersburg, Florida 33701  
Dianne.triplett@duke-energy.com

Matthew R. Bernier  
Stephanie A. Cuello  
106 East College Avenue, Suite 800  
Tallahassee, Florida 32301  
matthew.bernier@duke-energy.com  
stephanie.cuello@duke-energy.com  
**Attorneys for Duke Energy Florida**

Robert L. Pickels  
**Duke Energy Florida**  
106 East College Avenue, Suite 800  
Tallahassee, Florida 32301  
robert.pickels@duke-energy.com  
FLRegulatoryLegal@duke-energy.com

Robert Scheffel Wright  
John Thomas LaVia, III  
Gardner, Bist, Bowden, Dee, LaVia,  
Wright, Perry & Harper, P.A.  
1300 Thomaswood Drive  
Tallahassee, FL 32308  
schef@gbwlegal.com  
jlavia@gbwlegal.com  
**Attorneys for Florida Retail Federation**

Mary A. Wessling  
Associate Public Counsel  
Patricia A. Christensen  
Associate Public Counsel  
Charles J. Rehwinkel  
Deputy Public Counsel  
**Office of Public Counsel**  
The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee, Florida 32399  
wessling.mary@leg.state.fl.us  
christensen.patty@leg.state.fl.us  
rehwinkel.charles@leg.state.fl.us

J. Jeffrey Wahlen  
Malcolm N. Means  
Virginia Ponder  
Ausley McMullen  
123 S. Calhoun Street  
Post Office Box 391  
Tallahassee, Florida 32302  
jwahlen@ausley.com  
mmeans@ausley.com  
vponder@ausley.com  
**Attorneys for Tampa Electric Company**

Paula K. Brown  
**Tampa Electric Company**  
P.O. Box 111  
Tampa, Florida 33601-0111  
regdept@tecoenergy.com

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

Mike Cassel  
Vice President, Governmental  
and Regulatory Affairs  
**Florida Public Utilities Company**  
208 Wildlight Avenue  
Yulee, Florida 32097  
mcassel@fpuc.com

Michelle D. Napier  
Director, Regulatory Affairs  
**Florida Public Utilities Company**  
1635 Meathe Drive  
West Palm Beach, Florida 33411  
mnapier@fpuc.com

Peter J. Mattheis  
Michael K. Lavanga  
Joseph R. Briscar  
Stone Mattheis Xenopoulos & Brew, PC  
1025 Thomas Jefferson Street, NW  
Eighth Floor, West Tower  
Washington, DC 20007  
pjm@smxblaw.com  
mkl@smxblaw.com  
jrb@smxblaw.com  
**Attorneys for Nucor Steel Florida, Inc.**

Beth Keating  
Gunster Law Firm  
215 South Monroe Street, Suite 601  
Tallahassee, Florida 32301-1804  
bkeating@gunster.com  
**Attorneys for Florida Public Utilities  
Company**

James W. Brew  
Laura Wynn Baker  
Stone Mattheis Xenopoulos & Brew, P.C.  
1025 Thomas Jefferson Street, NW  
Eighth Floor, West Tower  
Washington, D.C. 20007  
jbrew@smxblaw.com  
lwb@smxblaw.com  
**Attorneys for White Springs  
Agricultural Chemicals, Inc. d/b/a PCS  
Phosphate – White Springs**

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

By: s/ Maria Jose Moncada  
Maria Jose Moncada  
Florida Bar No. 0773301