

Matilda Sanders

**ORIGINAL**

From: Elizabeth\_Carrero@fpl.com  
 Sent: Thursday, March 16, 2006 2:19 PM  
 To: Filings@psc.state.fl.us  
 Cc: Wade\_Litchfield@fpl.com; Natalie\_Smith@fpl.com; Kirk\_Gillen@fpl.com;  
 Nanci\_Nesmith@fpl.com; Bill\_Feaster@fpl.com; Lynne\_Adams@fpl.com;  
 Bryan\_Anderson@fpl.com; Patrick\_Bryan@fpl.com; Jack\_Leon@fpl.com; Cochran  
 Keating; Charles Beck; charlie\_beck@comcast.net; mcglothlin.joseph@leg.state.fl.us;  
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 miketwomey@talstar.com; swright@yvlaw.net; karen.white@tyndall.af.mil;  
 damund.williams@tyndall.af.mil; jlavia@yvlaw.net

Subject: Electronic Filing for Docket No. 060038-EI - FPL's March 16, 2006 regarding Discovery Limits

Attachments: FPL's March 16 2006 Correspondence re Discovery Limits.pdf

CMP \_\_\_\_\_  
 COM \_\_\_\_\_  
 CTR \_\_\_\_\_  
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 SGA \_\_\_\_\_  
 SEC   1    
 OTH \_\_\_\_\_



FPL's March  
006 Correspo

Electronic Filing

a. Person responsible for this electronic filing:

Natalie F. Smith  
 Principal Attorney  
 Florida Power & Light Company  
 700 Universe Blvd.  
 Juno Beach, FL 33408  
 (561) 691-7207  
 wade\_litchfield@fpl.com

b. Docket No. 060038-EI - Petition for issuance of a storm recovery financing order, by Florida Power & Light Company

c. Document being filed on behalf of Florida Power & Light Company.

d. There are a total of 1 page.

e. The document attached for electronic filing is a Notice of Serving Florida Power & Light Company's March 16, 2006 correspondence regarding Discovery Limits.

(See attached file: FPL's March 16 2006 Correspondence re Discovery Limits.pdf)

Thank you for your attention and cooperation to this request.

Elizabeth Carrero, Legal Asst  
 Wade Litchfield, Esq. and Natalie Smith, Esq.  
 Phone: 561-691-7100  
 Fax: 561-691-7135  
 email: elizabeth\_carrero@fpl.com

DOCUMENT NUMBER - DATE

02307 MAR 16 06

FPSC - COMMISSION CLERK

ORIGINAL



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Principal Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
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(561) 691-7207  
(561) 691-7135 (Facsimile)

March 16, 2006

Ms. Blanca S. Bayó, Director  
Division of the Commission Clerk and  
Administrative Services  
Florida Public Service Commission  
Betty Easley Conference Center  
2540 Shumard Oak Boulevard, Room 110  
Tallahassee, FL 32399-0850

**Re: Discovery Limits, Docket No. 060038-EI - Petition for issuance of a storm  
recovery financing order by Florida Power & Light Company**

Dear Ms. Bayó:

Please be advised that the Office of Public Counsel ("OPC") and Staff have exceeded the limit on discovery requests set in Order No. PSC-06-0069-PCO-EI, the Order Establishing Procedure in the above-referenced docket. Per the Order Establishing Procedure, the limit for interrogatories and requests for documents is set at 250, including subparts, per party. Including subparts, as of the date of this letter, OPC has served on FPL 341 interrogatories and Staff 274 interrogatories. Therefore, OPC has exceeded the discovery limits for interrogatories by 91 interrogatories and Staff by 24 interrogatories.

With respect to discovery served by OPC and Staff, FPL agrees to an increased limit of 350 discovery requests. Please do not hesitate to contact me should you or your Staff have any questions regarding this filing.

Sincerely,

A handwritten signature in black ink, appearing to read 'Natalie F. Smith', written over a horizontal line.

Natalie F. Smith

NFS:ec

cc: Parties of Record Docket No. 060038-EI