

ORIGINAL

BEFORE THE PUBLIC SERVICE COMMISSION

The City of North Miami, a municipal corporation, Petitioner.

In re: Requirement for investor-owned electric Utilities to file ongoing storm preparedness plans and implementation cost estimates.

DOCKET NO. 060198-EI
ORDER NO. PSC-06-0781-PAA-EI
ISSUED: September 19, 2006
FLORIDA BAR NO.: 0173071

PETITIONER'S REQUEST FOR PRODUCTION

Pursuant to Rules 25-22, 25-40, and 28-106, Florida Administrative Code and the Florida Rules of Civil Procedure (as applicable), Petitioner, the CITY OF NORTH MIAMI, by and through its undersigned attorney, requests that FPL, the Respondent, produce those documents and items enumerated below within twenty (20) days as set forth in the PSC "Order Establishing Procedure" and in accordance with said Rules.

1. Actuarial reports prepared for FPL that are related to North Miami tree-trimming after December 31, 2003?
2. A copy of a quantitative analysis FPL made of the costs associated with more frequent trimming compared to estimated benefits of reduced storm restoration costs due to avoided storm outages and supporting data.
3. FPL's 10-year total cost analysis demonstrating that its proposed alternative is more cost effective.
4. Copies of any and all correspondence signed by you or your attorneys with regards to studies of tree trimming cycles in North Miami.
5. Produce copies of all correspondence addressed by you or your agents to the Petitioner, CITY OF NORTH MIAMI; for each item please indicate the date mailed and whether mailed by regular U.S. Mail, certified mail or by any other type of mail process (including copies of said proof of mailing).
6. Any and all exhibits accompanying all of the above.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by U.S. Mail and electronic mail on this ____ day of November, 2006 to: John T. Butler, Esq., FPL, 700 Universe Blvd., Juno Beach, Florida 33408-0420 and to Rosanne Gervasi, Esq., Office of the General Counsel, Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

DOCUMENT NUMBER-DATE

10544 NOV 17 06

FPSC-COMMISSION CLERK

Respectfully submitted,

V. LYNN WHITFIELD
CITY ATTORNEY
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By: _____
MARIA E. ANTONATOS
ASSISTANT CITY ATTORNEY
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