

Kay Flynn

From: Antonatos, Maria [mantonatos@northmiamifl.gov]
Sent: Tuesday, December 19, 2006 8:49 AM
To: Filings@psc.state.fl.us
Attachments: NOF response to RFP BEFORE THE PUBLIC SERVICE COMMISSION.doc

ORIGINAL

12/19/06

Thank you. I still need to "file" the Notice (no responses) with the PSC. It is attached. That is, I am attaching "only [the] certificate of service of responses" for the docket file.

Sincerely,

Maria E. Antonatos
Assistant City Attorney

CITY OF NORTH MIAMI
Office of the City Attorney
776 N.E. 125 Street
North Miami, FL 33161
Phone: (305) 895-9810, ext. 12112
Facsimile: (305) 895-7029
E-Mail: mantonatos@northmiamifl.gov
Website: <http://www.northmiamifl.gov>

CMP _____
COM _____
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SGA _____
SEC 1
OTH _____

City of North Miami is a public entity subject to Chapter 119 of the Florida Statutes concerning public records. E-mail messages are covered under such laws and thus subject to disclosure. All E-mail sent and received is captured by our servers and kept as a public record.

From: Filings@psc.state.fl.us [mailto:Filings@PSC.STATE.FL.US]
Sent: Tuesday, December 19, 2006 7:55 AM
To: Antonatos, Maria; Filings@psc.state.fl.us
Cc: Rosanne Gervasi; Timolyn Henry; Matilda Sanders; Kimberley Pena
Subject: RE: Docket No. 060198-EI. City's response to FPL's request for production of documents.

Ms. Antonatos, the documents attached your e-mail were 126 pages, 29 pages, and 112 pages in length. The PSC accepts e-filings of no more than 100 pages. Further, the documents are responses to discovery requests and as such should not be filed with the Division of the Commission Clerk and Administrative Services. They should be sent directly to the PSC attorney. We require only a certificate of service of responses for the docket file.

We will not treat your submission as a filing, but will instead forward it to Rosanne Gervasi for proper handling.

Please let me know if any questions.

Kay Flynn
CCA - Records

12/20/2006

DOCUMENT NUMBER-DATE
11629 DEC 20 06
FPSC-COMMISSION CLERK

FPSC
850-413-6744
kflynn@psc.state.fl.us

From: Antonatos, Maria [<mailto:mantonatos@northmiamifl.gov>]
Sent: Monday, December 18, 2006 4:45 PM
To: Filings@psc.state.fl.us
Cc: Rosanne Gervasi
Subject: Docket No. 060198-EI. City's response to FPL's request for production of documents.

December 18, 2006
<<citysResponsetoFPLRequestforProd1-10 (Part I).12.18.06.pdf>>
<<citysResponsetoFPLRequestforProd1-10-002.12.18.06.pdf>> <<citysResponsetoFPLRequestforProd1-10-003.pdf>>

Dear PSC Clerk,

Re: Docket No. 060198-EI.

Attached hereto is the City's Production of Documents in response to FPL's request for production. The PSC attorney assigned to this matter is Roseanne Gervasi, Esq.

Sincerely,

Maria E. Antonatos
Assistant City Attorney

CITY OF NORTH MIAMI
Office of the City Attorney
776 N.E. 125 Street
North Miami, FL 33161
Phone: (305) 895-9810, ext. 12112
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12/20/2006

ORIGINAL

BEFORE THE PUBLIC SERVICE COMMISSION

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

DOCKET NO. 060198-EI
SERVED: 12/18/06
FLORIDA BAR NO.: 0173071

**PETITIONER CITY OF NORTH MIAMI'S RESPONSE
TO FPL's REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW the Defendant, City of North Miami (City), a Florida municipal corporation, by and through its undersigned counsel, and by way of response to the Plaintiffs' Request for Production propounded on November 28, 2006 states:

1. Documentation responsive to Interrogatories 1, 5, 24, 32 and 33 are attached hereto.
2. Objection, Work Product. Without waiving the objection, none.
3. Objection, Work Product.
4. Please refer to production of documents.
5. Please refer to production of documents.
6. Please refer to production of documents.
8. Please refer to production of documents.
9. Please refer to production of documents.
10. Please refer to production of documents.

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail and electronic mail on this 18th day of December, 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.

Respectfully submitted,

OFFICE OF THE CITY
ATTORNEY
V. LYNN WHITFIELD
CITY OF NORTH MIAMI

DOCUMENT NUMBER-DATE

11629 DEC 20 06

FPSC-COMMISSION CLERK

776 N.E. 125th Street
North Miami, FL 33161
Telephone: (305) 895-9810

By: /s/ Maria E. Antonatos
MARIA E. ANTONATOS
ASSISTANT CITY ATTORNEY
FLORIDA BAR NO. 0173071