

Matilda Sanders

From: Laura Ewan [lewan@earthjustice.org]
Sent: Friday, March 30, 2007 4:45 PM
To: Filings@psc.state.fl.us
Cc: Michael Gross; Kristen M. Standridge; Bill Walker; Charles Beck; Jennifer Brubaker; Katherine Fleming; Lorena Holley; Michael P. Halpin; Myron Rollins; Natalie F. Smith; R. Wade Lichtfield; Shaw Stiller
Subject: 070098-EI - Intervenors' Notice of Service of Objections to PSC's First Set of Interrogatories (Nos. 1-16)
Attachments: Intervenor Notice of service of objections to Staffs 1st set interrogs.pdf

ORIGINAL

<<Intervenor Notice of service of objections to Staffs 1st set interrogs.pdf>>

Electronic Filing

A. Person responsible for this electronic filing

Michael Gross
111 S. Martin Luther King Jr. Blvd.
Tallahassee, FL 32301
850-681-0031
mgross@earthjustice.org

B. Docket No. 070098-EI

In Re: Florida Power & Light Company's Petition to Determine Need for FPL Glades Power Park Units 1 and 2 Electrical Power Plant

C. Documents are being filed on behalf of The Sierra Club, Inc. (Sierra Club), Save Our Creeks (SOC), Florida Wildlife Federation (FWF), Environmental Confederation of Southwest Florida (ECOSWF), and Ellen Peterson.

D. There are a total of 2 pages in the attached document.

E. The document attached for electronic filing is the Intervenors' Notice of Service of Objections to PSC's First Set of Interrogatories (Nos. 1-16).

Thank you for your attention and cooperation regarding this request.

Laura Ewan
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--Because the Earth Needs a Good Lawyer--

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DOCUMENT NUMBER-DATE

02793 MAR 30 6

FPSC-COMMISSION CLERK

4/2/2007

ORIGINAL

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition for determination of need for)	DOCKET NO.: 070098-EI
Glades Power Park Units 1 and 2 electrical)	
Power plants in Glades County, by Florida)	DATED: March 30, 2007
Power & Light Company)	
_____)		

NOTICE OF SERVICE
OF THE SIERRA CLUB, INC., SAVE OUR CREEKS, FLORIDA,
FLORIDA WILDLIFE FEDERATION, ENVIRONMENTAL CONFEDERATOIN OF
SOUTHWEST FLORIDA, AND ELLEN PETERSON'S OBJECTIONS TO FLORIDA
PUBLIC SERVICE COMMISSION STAFF'S (STAFF) FIRST SET OF
INTERROGATORIES (NOS. 1-16)

The Sierra Club, Inc., Save Our Creeks, Florida, Florida Wildlife Federation, Environmental Confederation of Southwest Florida, and Ellen Peterson, collectively referred to herein as Intervenors, hereby give notice of service of their objections to the First Set of Interrogatories of the Staff of the Florida Public Service Commission, (Nos. 1-16), to Jennifer S. Brubaker, Senior Attorney, Florida Public Service Commission, 2540 Shumard Oak Blvd., Tallahassee, Florida 32399-0850, with a copy to all Counsel in the attached Certificate of Service.

Respectfully submitted this 30th day of March, 2007 by:

/s/ Michael Gross
 Earthjustice, Inc.
 111 S. Martin Luther King, Jr., Blvd
 Tallahassee, Florida 32301
 (850) 681-0031
 Fla. Bar ID. 0199461
 Attorney for Intervenors

DOCUMENT NUMBER-DATE

02793 MAR 30 05

FPSC-COMMISSION CLERK

**NOTICE OF SERVICE OF INTERVENORS' OBJECTIONS
TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-26)
DOCKET NO. 070098-EI, Page 2 of 2**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on this 30th day of March, 2007, via electronic mail and US Mail on:

Florida Power & Light Company
R. Wade Lichtfield
Natalie F. Smith
700 Universe Boulevard
Juno Beach, FL 33408
Email: Wade_Litchfield@fpl.com
Natalie_Smith@fpl.com

Florida Power & Light Company
Mr. Bill Walker
215 South Monroe Street, Suite 810
Tallahassee, FL 32301-1859
Email: bill_walker@fpl.com

Black & Veatch
Myron Rollins
11401 Lamar Avenue
Overland Park, KS 66211
Email: rollinsmr@bv.com

Department of Community Affairs
Shaw Stiller
Division of Community Planning
2555 Shumard Oak Blvd.
Tallahassee, FL 32399-2100
Email: shaw.stiller@dca.state.fl.us

Department of Environmental Protection
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Siting Coordination Office
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Tallahassee, FL 32301
Email: mike.halpin@dep.state.fl.us

Florida Public Service Commission
Katherine E. Fleming, Esq.
Jennifer Brubaker, Esq.
Lorena Holley, Esq.
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Email: keflemin@psc.state.fl.us
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Office of Public Counsel
Charles J. Beck, Esq.
Deputy Public Counsel
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111 W. Madison St., Room 812
Tallahassee, FL 32399-1400
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/s/ Michael Gross
Attorney