

**Dorothy Menasco**

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**From:** Leon, Jack [Jack.Leon@fpl.com]  
**Sent:** Monday, April 27, 2009 4:12 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Litchfield, Wade; Butler, John; Goorland, Scott  
**Subject:** FPL's Notice of Service of Objections to Staff's 1st Set of Interrogatories (Nos. 1-28) and 1st Request for Production of Documents (Nos. 1-2) - Docket No. 090172-EI  
**Attachments:** FPL's Notice of Service of Objections to Staff's 1st Set of Interrogatories (Nos. 1-28) & 1st Request for Production of Documents (Nos. 1-2)\_4-27-09.pdf

**Electronic Filing****a.** Person responsible for this electronic filing:

Joaquin E. Leon, Esquire  
 Florida Power & Light Company  
 9250 W. Flagler St., Suite 6514  
 Miami, FL 33174  
 (305) 552-3922  
[jack.leon@fpl.com](mailto:jack.leon@fpl.com)

**b.** Docket No. 090172-EI

In re: Petition to determine need for Florida  
 EnergySecure Pipeline by Florida Power & Light Company

**c.** Documents are being filed on behalf of Florida Power & Light Company.**d.** There are a total of 2 pages in the attached document.**e.** The document attached for electronic filing is Florida Power & Light Company's Notice of Service of Objections to Staff's 1st Set of Interrogatories (Nos. 1-28) and 1st Request for Production of Documents (Nos. 1-2).

Thank you for your attention and cooperation to this request.

Jack Leon  
 Senior Attorney  
 Florida Power & Light Company  
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DOCUMENT NUMBER-DATE

03930 APR 27 8

4/27/2009

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition to determine need for Florida )  
EnergySecure Pipeline by )  
Florida Power & Light Company )

Docket No: 090172-EI  
Served: April 27, 2009

**NOTICE OF SERVICE OF FLORIDA POWER & LIGHT COMPANY'S OBJECTIONS  
TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-28) AND  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-2)**

Florida Power & Light Company hereby gives notice of service of its objections to the to the Staff of the Florida Public Service Commission's ("Staff's") First Set of Interrogatories (Nos. 1-28) and First Request for Production of Documents (Nos. 1-2) to Martha C. Brown, counsel for Staff.

Respectfully submitted this 27th day of April, 2009.

R. Wade Litchfield, Vice President of  
Regulatory Affairs and Chief Regulatory Counsel  
John T. Butler, Managing Attorney  
Scott A. Goorland, Principal Attorney  
Attorneys for Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
Telephone: (561) 691-7101  
Facsimile: (561) 691-7135

By: \_\_\_\_\_

Scott A. Goorland  
Florida Bar No. 0066834

DOCUMENT NUMBER-DATE

03930 APR 27 09

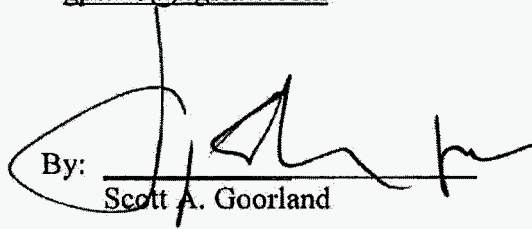
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished electronically and by United States Mail this 27th day of April, 2009, to the following:

Martha C. Brown  
Senior Counsel  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
[mbrown@psc.state.fl.us](mailto:mbrown@psc.state.fl.us)

Gary V. Perko, Esquire/  
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By:   
Scott A. Goorland