

## Ruth Nettles

---

**From:** Leon, Jack [Jack.Leon@fpl.com]  
**Sent:** Tuesday, June 23, 2009 4:40 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Anderson, Bryan; cguyton@ssd.com; Cano, Jessica  
**Subject:** Electronic Filing for Docket Nos. 080407-EG, et al. / Notice of Service of Objections to NRDC-SACE's 1st Request for Production of Documents (Nos. 1-3)  
**Attachments:** FPL's Notice of Service of Objections to NRDC-SACE's 1st Request for Production of Documents (Nos. 1-3)\_6-23-09.pdf

### Electronic Filing

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

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

**b. Docket Nos. 080407-EG, et al.**

In re: Commission review of numeric conservation goals (Florida Power & Light Company, et al.).

**c. Documents are being filed on behalf of Florida Power & Light Company.**

**d. There are a total of 4 pages in the attached document.**

**e. The document attached for electronic filing is Florida Power & Light Company's Notice of Service of Objections to NRDC-SACE's 1st Request for Production of Documents (Nos. 1-3).**

Thank you for your attention and cooperation to this request.

Jack Leon  
Senior Attorney  
Florida Power & Light Company  
9250 W. Flagler St., Suite 6514  
Miami, FL 33174  
(305) 552-3922  
Fax: (305) 552-4911  
Cell: (305) 439-1661

DOCUMENT NUMBER-DATE  
06304 JUN 23 8  
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric conservation goals (Florida Power & Light Company).	DOCKET NO. 080407-EG
In re: Commission review of numeric conservation goals (Progress Energy Florida, Inc.).	DOCKET NO. 080408-EG
In re: Commission review of numeric conservation goals (Tampa Electric Company).	DOCKET NO. 080409-EG
In re: Commission review of numeric conservation goals (Gulf Power Company).	DOCKET NO. 080410-EG
In re: Commission review of numeric conservation goals (Florida Public Utilities Company).	DOCKET NO. 080411-EG
In re: Commission review of numeric conservation goals (Orlando Utilities Commission).	DOCKET NO. 080412-EG
In re: Commission review of numeric conservation goals (JEA).	DOCKET NO. 080413-EG

Filed: June 23, 2009

**NOTICE OF SERVICE OF  
FLORIDA POWER & LIGHT COMPANY'S OBJECTIONS TO  
NRDC'S AND SACE'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-3)**

Florida Power & Light Company ("FPL") gives notice of service of its objections to Natural Resources Defense Council's ("NRDC's") and Southern Alliance for Clean Energy's ("SACE's") First Request for Production of Documents (Nos. 1-3) to E. Leon Jacobs, Jr., counsel for NRDC and SACE.

Respectfully submitted this 23<sup>rd</sup> day of June, 2009.

R. Wade Litchfield, Vice President of Regulatory  
Affairs and Chief Regulatory Counsel  
Charlie A. Guyton, Esq.  
Jessica A. Cano, Esq.  
Attorneys for Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
Telephone: (561) 304-5226  
Facsimile: (561) 697-7125

By:

  
Jessica A. Cano

Fla. Bar No. 0037372

DOCUMENT NUMBER-DATE

06304 JUN 23 8

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 23<sup>rd</sup> day of June, 2009, to the following:

Katherine E. Fleming, Senior Attorney  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850  
[keflem@psc.state.fl.us](mailto:keflem@psc.state.fl.us)

E. Leon Jacobs, Jr., Esquire  
Williams & Jacobs, LLC  
1720 S. Gadsden St., MS 14 Suite 201  
Tallahassee, FL 32301  
[Ljacobs50@comcast.net](mailto:Ljacobs50@comcast.net)  
Attorney for Southern Alliance for Clean  
Air/Natural Resources

Susan Clark, Esquire  
Radey Law Firm  
301 South Bronough Street, Suite 200  
Tallahassee, FL 32301  
Attorney for Itron  
[sclark@radeylaw.com](mailto:sclark@radeylaw.com)

Paul Lewis, Jr., Esquire  
106 East College Avenue, Suite 800  
Tallahassee, FL 32301-7740  
[Paul.lewisjr@pgnmail.com](mailto:Paul.lewisjr@pgnmail.com)  
Attorney for Progress Energy Florida, Inc

John T. Burnett, Esquire  
P.O. Box 14042  
Saint Petersburg, FL 33733-4042  
[John.Burnett@pgnmail.com](mailto:John.Burnett@pgnmail.com)  
Attorney for Progress Energy Service Company,  
LLC

Suzanne Brownless, Esquire  
Suzanne Brownless, P.A.  
1975 Buford Blvd.  
Tallahassee, FL 32308  
[suzannebrownless@comcast.net](mailto:suzannebrownless@comcast.net)  
Attorney for Florida Solar Coalition

Tampa Electric Company  
Ms. Paula K. Brown  
Regulatory Affairs  
P. O. Box 111  
Tampa, FL 33601-0111

Lee L. Willis, II, Esquire  
James D. Beasley, Esquire  
Ausley Law Firm  
Post Office Box 391  
Tallahassee, FL 32302  
[jbeasley@ausley.com](mailto:jbeasley@ausley.com)  
[lwillis@ausley.com](mailto:lwillis@ausley.com)  
Attorneys for Tampa Electric Company

George S. Cavros, Esq.  
George S. Cavros, Esq. P.A.  
120 E. Oakland Park Blvd., Suite 105  
Ft. Lauderdale, Florida 33334  
[george@cavros-law.com](mailto:george@cavros-law.com)  
Co-Counsel for NRDC/SACE

Steven R. Griffin, Esquire  
Begg & Lane Law Firm  
501 Commendencia Street  
Pensacola, FL 32502  
[srg@beggs-lane.com](mailto:srg@beggs-lane.com)  
Attorney for Gulf Power Company

Florida Public Utilities Company  
Mr. John T. English, Esquire  
P. O. Box 3395  
West Palm Beach, FL 33402-3395

Jacksonville Electric Authority  
Ms. Teala A. Milton  
V.P., Government Relations  
21 West Church Street, Tower 16  
Jacksonville, FL 32202-3158  
[militta@jea.com](mailto:militta@jea.com)

Jeremy Susac  
Executive Director  
Florida Energy and Climate Commission  
c/o Governor's Energy Office  
600 South Calhoun Street, Suite 251  
Tallahassee, Florida 32399-0001

John. W. McWhirter, Jr., Esquire  
PO Box 3350  
Tampa, Florida 33601  
[jmcwhirter@mac-law.com](mailto:jmcwhirter@mac-law.com)

Vicki G. Kaufman/Jon C. Moyle, Jr.  
c/o Keefe Law Firm, The Perkins House  
118 North Gadsden Street  
Tallahassee, FL 32301  
[vkaufman@kgmlaw.com](mailto:vkaufman@kgmlaw.com)  
Attorneys for Florida Industrial Power Users Group

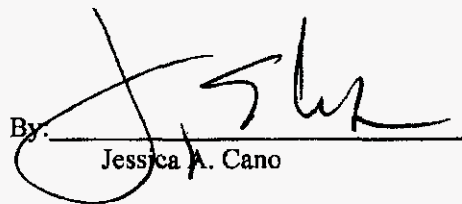
Orlando Utilities Commission  
W. Chris Browder / Randy Halley  
100 W. Anderson Street  
Tallahassee, FL 32301  
[cbrowder@ouc.com](mailto:cbrowder@ouc.com)

Roy C. Young/Tasha O. Buford  
Young Law Firm  
225 S. Adams Street, Suite 200  
Tallahassee, FL 32301  
[ryoung@yvlaw.net](mailto:ryoung@yvlaw.net)  
Attorneys for OUC

Norman H. Horton, Jr., Esquire  
Messer Law Firm  
Post Office Box 15579  
Tallahassee, FL 32317  
[nhorton@lawfla.com](mailto:nhorton@lawfla.com)  
Attorneys for Florida Public Utilities Co.

Gulf Power Company  
Ms. Susan D. Ritenour  
One Energy Place  
Pensacola, FL 32520-0780  
[sdritenour@southernco.com](mailto:sdritenour@southernco.com)

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



Jessca A. Cano