

**Ruth Nettles**

**From:** Leon, Jack [Jack.Leon@fpl.com]  
**Sent:** Wednesday, July 22, 2009 4:13 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Butler, John; Cano, Jessica; Goorland, Scott  
**Subject:** FPL's Notice of Service of 3rd Request for Production of Documents (No. 28) to FIPUG - Docket No. 080677-EI  
**Attachments:** FPL's Notice of Service of 3rd POD (No. 28) to FIPUG\_7-22-09.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. 080677-EI

In re: Petition for rate increase by  
Florida Power & Light Company

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

d. There are a total of 3 pages in the attached document.

e. The document attached for electronic filing is Florida Power & Light Company's Notice of Service of 3rd Request for Production of Documents (No. 28) to FIPUG.

Thank you for your attention and cooperation to this request.

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

**The FPL Law Department is proud to be an ABA-EPA Law Office Climate Challenge Partner. Please think before you print!**

The information contained in this electronic message is confidential information intended only for the use of the named recipient(s) and may be the subject of attorney-client privilege. If the reader of this electronic message is not the named recipient, or the employee or agent responsible to deliver it to the named recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is strictly prohibited and no privilege is waived. If you have received this communication in error, please immediately notify us by telephone (305) 552-3922 or by replying to this electronic message. Thank you

DOCUMENT NUMBER-DATE

07462 JUL 22 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by )  
Florida Power & Light Company )

Docket No: 080677-EI  
Filed: June 22, 2009

**NOTICE OF SERVICE OF FLORIDA POWER & LIGHT COMPANY'S  
THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 28)  
TO THE FLORIDA INDUSTRIAL POWER USERS GROUP**

Florida Power & Light Company, by and through its undersigned counsel, hereby gives notice that it has served its Third Request for Production of Documents (No. 28) on counsel for the Florida Industrial Power Users Group:

Jon C. Moyle, Jr., Esquire  
Vicki Gordon Kaufman, Esquire  
Keefe Anchors Gordon & Moyle, PA  
118 North Gadsden Street  
Tallahassee, FL 32301

and

John W. McWhirter, Jr., Esquire  
c/o McWhirter Law Firm  
P.O. Box 3350  
Tampa, FL 33601

Respectfully submitted this 22<sup>nd</sup> day of July, 2009.

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

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

Ken Rubin  
Florida Bar No. 349038

DOCUMENT NUMBER-DATE

07462 JUL 22 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 22<sup>nd</sup> day of July, 2009, to the following:

Lisa Bennett, Esquire  
Anna Williams, Esquire  
Martha Brown, Esquire  
Jean Hartman, Esquire  
Office of the General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-1400  
[LBENNETT@PSC.STATE.FL.US](mailto:LBENNETT@PSC.STATE.FL.US)  
[ANWILLIA@PSC.STATE.FL.US](mailto:ANWILLIA@PSC.STATE.FL.US)  
[mbrown@psc.state.fl.us](mailto:mbrown@psc.state.fl.us)  
[JHARTMAN@PSC.STATE.FL.US](mailto:JHARTMAN@PSC.STATE.FL.US)

Robert A. Sugarman, Esquire  
D. Marcus Braswell, Jr., Esquire  
c/o Sugarman & Susskind, P.A.  
100 Miracle Mile, Suite 300  
Coral Gables, FL 33134  
Attorneys for I.B.E.W. System Council U-4  
[sugarman@sugarmansusskind.com](mailto:sugarman@sugarmansusskind.com)  
[mbraswell@sugarmansusskind.com](mailto:mbraswell@sugarmansusskind.com)

J.R. Kelly, Esquire  
Joseph A. McGlothlin, Esquire  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400  
Attorneys for the Citizens of the State  
of Florida  
[Kelly.jr@leg.state.fl.us](mailto:Kelly.jr@leg.state.fl.us)  
[mcglothlin.joseph@leg.state.fl.us](mailto:mcglothlin.joseph@leg.state.fl.us)

Robert Scheffel Wright, Esquire  
John T. LaVia, III, Esquire  
Young van Assenderp, P.A.  
225 South Adams Street, Suite 200  
Tallahassee, Florida 32301  
Attorneys for the Florida Retail Federation  
[swright@yvlaw.net](mailto:swright@yvlaw.net)  
[jlavia@yvlaw.net](mailto:jlavia@yvlaw.net)

Kenneth L. Wiseman, Esquire  
Mark F. Sundback, Esquire  
Jennifer L. Spina, Esquire  
Lisa M. Purdy, Esquire  
Andrews Kurth LLP  
1350 I Street, NW, Suite 1100  
Washington, DC 20005  
Attorneys for South Florida Hospital and  
Healthcare Association ("SFHHA")  
[kwiseman@andrewskurth.com](mailto:kwiseman@andrewskurth.com)  
[msundback@andrewskurth.com](mailto:msundback@andrewskurth.com)  
[jspina@andrewskurth.com](mailto:jspina@andrewskurth.com)  
[lisapurdy@andrewskurth.com](mailto:lisapurdy@andrewskurth.com)

Jon C. Moyle, Jr., Esquire  
Vicki Gordon Kaufman, Esquire  
Keefe Anchors Gordon & Moyle, PA  
118 North Gadsden Street  
Tallahassee, FL 32301  
Attorneys for The Florida Industrial Power  
Users Group (FIPUG)  
[jmoyle@kagmlaw.com](mailto:jmoyle@kagmlaw.com)  
[vkaufman@kagmlaw.com](mailto:vkaufman@kagmlaw.com)

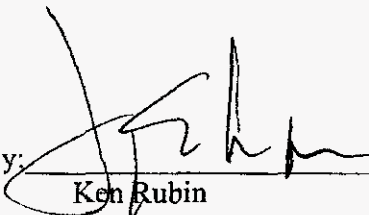
John W. McWhirter, Jr., Esquire  
c/o McWhirter Law Firm  
P.O. Box 3350  
Tampa, FL 33601  
Attorneys for The Florida Industrial Power  
Users Group (FIPUG)  
[jmcwhirter@mac-law.com](mailto:jmcwhirter@mac-law.com)

Thomas Saporito  
Saporito Energy Consultants, Inc.  
Post Office Box 8413  
Jupiter, FL 33468-8413  
[support@SaporitoEnergyConsultants.com](mailto:support@SaporitoEnergyConsultants.com)

Stephanie Alexander, Esquire  
Tripp Scott, P.A.  
200 West College Avenue, Suite 216  
Tallahassee, FL 32301  
Attorneys for Association For Fairness In  
Rate Making (AFFIRM)  
[sda@trippscott.com](mailto:sda@trippscott.com)

Brian P. Armstrong, Esquire  
Marlene K. Stern, Esquire  
Nabors, Giblin & Nickerson, P.A.  
1500 Mahan Drive, Suite 200  
Tallahassee, FL 32308  
Attorneys for the City of South Daytona,  
Florida  
[barmstrong@ngnlaw.com](mailto:barmstrong@ngnlaw.com)  
[mstern@ngnlaw.com](mailto:mstern@ngnlaw.com)

Cecilia Bradley  
Senior Assistant Attorney General  
Office of the Attorney General  
The Capitol - PL01  
Tallahassee, FL 32399-1050  
[cecilia.bradley@myfloridalegal.com](mailto:cecilia.bradley@myfloridalegal.com)

By:   
Ken Rubin