

**Ruth Nettles**

080407-EG

**From:** ljacobs50@comcast.net  
**Sent:** Friday, July 31, 2009 5:03 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Katherine Fleming; Alex Glenn; Brenda Buchan; C. Browder; Charles Beck; Jack English; J.R. Kelly; Jack Leon; James D. Beasley; Jeremy Susac; John T. Burnett; Myron Rollins; Norman H. Horton; Paul Lewis; Paula K. Brown; Randy Halley; Richard J. Vento; Steven Griffin; Susan Clark; sandra.brice@pgnmail.com; Susan Ritenour; Suzanne Brownless; Teala Milton; Wade\_Litchfield; April Vicary; KushnerB@bv.com; GARYP@hgslaw.com; vkaufman@kagmlaw.com; jmoyle@kagmlaw.com; cguyton@ssd.com; Jessica Cano; ryoung@yvlaw.net; tbuford@yvlaw.net  
**Subject:** Docket Nos. 080407-080413 NRDC-SACE Notice of Service of Responses to PEF's 1st Request for PODs (Nos 1-2)  
**Attachments:** Notice of Svc of NRDC-SACE Resp to PEF 1st POD FINAL.pdf

a. The person responsible for this filing is:

E. Leon Jacobs, Jr.  
Williams & Jacobs  
1720 S. Gadsden St. MS 14  
Tallahassee, FL 32301  
(850) 222-1246  
ljacobs50@comcast.net

b. This filing is made in: Docket Nos. 080407-080413 Numeric Conservation Goals:

c. This filing is made on behalf of the Natural Resources Defense Council, Inc., and the Southern Alliance for Clean Energy, Inc.

d. The total pages in the attached documents are four.

e. The document consists of NRDC-SACE's Notice of Service of its Responses to PEF's First Request for Production of Documents (Nos 1-2).

DOCUMENT NUMBER-DATE

07882 AUG-3 08

8/3/2009

FPSC-COMMISSION CLERK

WILLIAMS & JACOBS, LLC

ATTORNEYS AT LAW  
1720 S. GADSDEN ST. MS. 14  
TALLAHASSEE, FL 32301

MOSES WILLIAMS, ESQ.

E. LEON JACOBS, JR., ESQ.

July 31, 2009

Ann Cole  
Director, Office of the Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Blvd  
Tallahassee, Florida 32399-0850

RE: Docket No. 080407-EG Florida Power & Light Company;  
Docket No. 080408-EG Progress Energy, Florida, Inc. ;  
Docket No. 080409-EG Tampa Electric Company;  
Docket No. 080410-EG Gulf Power Company ;  
Docket No. 080411-EG Florida Public Utilities Company;  
Docket No. 080412-EG Orlando Utilities C; and  
Docket No. 080413-EG Jacksonville Electric Authority

Dear Ms. Cole:

On behalf of the Southern Alliance for Clean Energy, and the Natural Resources Defense Council, I have enclosed for filing Notice of Service of NRDC-SACE Responses to Progress Energy of Florida's First Request for Production of Documents (Nos. 1-2) in the above-stated dockets. I thank you for your attention to this matter.

Sincerely,

*/s/ E. Leon Jacobs, Jr.*

E. Leon Jacobs, Jr.  
Attorney for Intervenors

Enclosures

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Commission Review of Numeric ) DOCKET NO. 080407-EG  
Conservation Goals )  
Florida Power & Light Company )  
\_\_\_\_\_ )

In re: Commission Review of Numeric ) DOCKET NO. 080408-EG  
Conservation Goals )  
Progress Energy, Florida, Inc. )  
\_\_\_\_\_ )

In re: Commission Review of Numeric ) DOCKET NO. 080409-EG  
Conservation Goals )  
Tampa Electric Company )  
\_\_\_\_\_ )

In re: Commission Review of Numeric ) DOCKET NO. 080410-EG  
Conservation Goals )  
Gulf Power Company )  
\_\_\_\_\_ )

In re: Commission Review of Numeric ) DOCKET NO. 080411-EG  
Conservation Goals )  
Florida Public Utilities Company )  
\_\_\_\_\_ )

In re: Commission Review of Numeric ) DOCKET NO. 080412-EG  
Conservation Goals )  
Orlando Utilities Commission )  
\_\_\_\_\_ )

In re: Commission Review of Numeric ) DOCKET NO. 080413-EG  
Conservation Goals )  
Jacksonville Electric Authority )  
\_\_\_\_\_ )

**NOTICE OF SERVICE OF**  
**INTERVENORS NATURAL RESOURCES DEFENSE COUNCIL AND**  
**SOUTHERN ALLIANCE FOR CLEAN ENERGY, INC.**  
**OBJECTIONS AND RESPONSES TO PROGRESS ENERGY OF FLORIDA**  
**FIRST REQUEST FOR PRODUCTION OF DUCUMENTS (NOS 1-2)**

**NOTICE IS HEREBY GIVEN** that Intervenor, the Natural Resources Defense Council and the Southern Alliance for Clean Energy, Inc., by and through their undersigned attorney,

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

have on the 31st day of July, 2009, hereby submit their Responses to Progress Energy Florida's First Request for Production of Documents (Nos. 1-2) to Progress Energy of Florida.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy and correct copy of the foregoing was served on this 31st day of July, 2009 via email (\*) and/or US Mail on:

<p>Katherine Fleming, Esq. *  Erik L. Slayer, Esq. *  Florida Public Service Commission  Gerald L. Gunter Building  2540 Shumard Oak Boulevard  Tallahassee, Florida 32399-0850  <u>KEFLEMIN@PSC.STATE.FL.US</u>  <u>esayer@PSC.STATE.FL.US</u></p>	<p>J.R. Kelly / Stephen Burgess *  Office of Public Counsel  c/o The Florida Legislature  111 W. Madison Street, Room 812  Tallahassee, FL 32399-1400  <u>kelly.jr@leg.state.fl.us</u></p>
<p>Jack Leon, Esq., *  Wade Litchfield, Esq. *  Florida Power &amp; Light Company  215 S. Monroe Street, Suite 810  Tallahassee, Florida 32301-1859  <u>Jack.Leon@fpl.com</u>  <u>Wade.Litchfield@fpl.com</u></p>	<p>Mr. Paul Lewis, Jr. *  Progress Energy Florida  106 East College Avenue, Suite 800  Tallahassee, FL 32301-7740  <u>paul.lewisjr@pgnmail.com</u></p>
<p>John T. Burnett / R. Alexander Glenn *  Progress Energy Service Company, LLC  Post Office Box 14042  St. Petersburg, FL 33733-4042  <u>john.burnett@pgnmail.com</u></p>	<p>Paula K. Brown *  Tampa Electric Company  Regulatory Affairs  P. O. Box 111  Tampa, FL 33601-0111  <u>regdept@tecoenergy.com</u></p>
<p>Susan D. Ritenour *  Gulf Power Company  One Energy Place  Pensacola, FL 32520-0780  <u>sdriteno@southernco.com</u></p>	<p>John T. English  Florida Public Utilities Company  P. O. Box 3395  West Palm Beach, FL 33402-3395</p>
<p>Chris Browder *  Orlando Utilities Commission  P. O. Box 3193  Orlando, FL 32802-3193  <u>cbrowder@ouc.com</u></p>	<p>Teala M. Milton *  JEA  V.P., Government Relations  21 West Church Street, Tower 16  Jacksonville, FL 32202-3158  <u>miltta@jea.com</u></p>
<p>Suzanne Brownless, Esq. *  1975 Buford Boulevard  Tallahassee, FL 32308  <u>suzannebrownless@comcast.net</u></p> <p>James D. Beasley, Esq., *  Lee L. Willis, Esq. *  Ausley Law Firm</p>	<p>Jeremy Susac *  Florida Energy Commission  600 South Calhoun Street, Suite 251  Tallahassee, FL 32399-001  <u>jeremy.susac@eog.myflorida.com</u></p> <p>Susan Clark, Esq. *  Radey Law Firm  301 South Bronough Street, Suite 200</p>

<p>PO Box 391 Tallahassee, FL 32302 <a href="mailto:jbeasley@ausley.com">jbeasley@ausley.com</a> <a href="mailto:lwillis@ausley.com">lwillis@ausley.com</a></p> <p>Steven R. Griffin, Esq. * Beggs and Lane Law Firm 501 Commendencia Street Pensacola, FL 32502 <a href="mailto:srg@beggslane.com">srg@beggslane.com</a></p>	<p>Tallahassee, FL 32301 <a href="mailto:sclark@radeylaw.com">sclark@radeylaw.com</a></p> <p>Norman Horton, Jr., Esq. * Messer, Caparello and Self, P.A. 2618 Centennial Place Tallahassee, FL 32308 <a href="mailto:nhorton@lawfla.com">nhorton@lawfla.com</a></p>
<p>Charles A. Guyton Squire, Sanders &amp; Dempsey, LLP 215 South Monroe Street, Suite 601 Tallahassee, FL 32301</p>	<p>Roy C. Young/Tasha O. Buford Young Law Firm 225 S. Adams Street, Suite 200 Orlando, Florida 32802</p>
<p>Jon C. Moyle, Esq. Vicki Gordon Kaufman, Esq. Keefe, Anchors, Gordon &amp; Moyle, P.A. 118 N. Gadsden St. Tallahassee, Florida 32301</p>	<p>Jessica Cano, Esq. Florida Power &amp; Light 700 Universe Blvd Juno Beach, Fl 33048</p>

This 31st day of July, 2009.

/s/ E. Leon Jacobs, Jr.

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Tallahassee, Florida 32301  
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