

John T. Butler Managing Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420 (561) 304-5639 (561) 691-7135 (Facsimile)

January 26, 2010



VIA HAND DELIVERY

Ms. Ann Cole Division of the Commission Clerk and Administrative Services Florida Public Service Commission Betty Easley Conference Center 2540 Shumard Oak Boulevard, Room 110 Tallahassee, FL 32399-0850

Re: Docket No. 080677-EI and Docket No. 090130-EI

Dear Ms. Cole:

Enclosed for filing on behalf of Florida Power & Light Company are the original and five (5) copies of its responses to Staff's Data Requests dated January 20, 2010.

The same questions were posed by Staff in a set of interrogatory requests, titled "Staff's Sixteenth Set of Interrogatories to Florida Power & Light Company (Nos. 282-287)" also dated January 20, 2010. Because the questions are the same, FPL's answers to both sets of discovery are the same. FPL is enclosing herewith six (6) copies of its affidavits attesting to the interrogatory answers. FPL is also enclosing the original and seven (7) copies of the notice of serving responses to the interrogatories and data requests.

Please contact me if you or your Staff has any questions regarding this filing.

Sincerely, COM John T. Butler APA ECR is to obterropatories GCL * All CONTS / a RAD Enclosures SSC ADM Parties of Record DOCUMENT NUMBER-DATE CC: OPC 00607 JAN 26 2 CLK FFSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

)

)

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

In re: 2009 depreciation and dismantlement) study by Florida Power & Light Company ____) Docket No: 080677-EI

Docket No. 090130-EI Served: January 26, 2010

FLORIDA POWER & LIGHT COMPANY'S NOTICE OF SERVICE OF RESPONSES TO THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION'S SIXTEENTH SET OF INTERROGATORIES (NOS. 282-287) AND DATA REQUESTS DATED JANUARY 20, 2010

Florida Power & Light Company hereby gives notice of service of its responses to the

Staff of the Florida Public Service Commission's Sixteenth Set of Interrogatories (Nos. 282-287)

and Data Requests dated January 20, 2009 to Lisa Bennett.

Respectfully submitted this 26th day of January, 2010.

R. Wade Litchfield, Vice President of Regulatory Affairs and Chief Regulatory Counsel John T. Butler, Managing Attorney Jessica A. Cano, Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, Florida 33408-0420 Telephone: (561) 3004-5226 Facsimile: (561) 69477135

John 7. Butler Bar No. 283479

By:

BOUCHERT RUMBER-BATE

0607 JAN 26 2

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 26th day of January, 2010, 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 <u>LBENNETT@PSC.STATE.FL.US</u> <u>ANWILLIA@PSC.STATE.FL.US</u> <u>mbrown@psc.state.fl.us</u> JHARTMAN@PSC.STATE.FL.US

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 mcglothlin.joseph@leg.state.fl.us

Kenneth L. Wiseman, Esquire Mark F. Sundback, Esquire Jennifer L. Spina, Esquire Lisa M. Purdy, Esquire Lino Mendiola, Esquire Meghan Griffiths, 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 msundback@andrewskurth.com jspina@andrewskurth.com lisapurdy@andrewskurth.com linomendiola@andrewskurth.com

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 <u>sugarman@sugarmansusskind.com</u> <u>mbraswell@sugarmansusskind.com</u>

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 <u>swright@yvlaw.net</u> <u>jlavia@yvlaw.net</u>

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 vkaufman@kagmlaw.com

meghangriffiths@andrewskurth.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

Stephen Stewart P.O. Box 12878 Tallahassee, FL 32317 Qualified Representative for Richard Ungar tips@fpscreports.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) <u>sda@trippscott.com</u>

Shayla L. McNeill, Capt, USAF Utility Litigation & Negotiation Team Staff Attorney AFLOA/JACL-ULT AFCESA 139 Barnes Drive, Suite 1 Tyndall AFB, FL 32403-5317 Attorneys for the Federal Executive Agencies shayla.mcneill@tyndall.af.mil

Mary F. Smallwood, Esq. Ruden, McClosky, Smith, Schuster & Russell, P.A. 215 South Monroe Street, Suite 815 Tallahassee, FL 32301 Attorney for Associated Industries of Florida Mary.Smallwood@Ruden.com Brian P. Armstrong, Esquire Nabors, Giblin & Nickerson, P.A. 1500 Mahan Drive, Suite 200 Tallahassee, FL 32308 Attorneys for the City of South Daytona, Florida <u>barmstrong@ngnlaw.com</u>

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

Tamela Ivey Perdue, Esquire Associated Industries of Florida 516 North Adams Street Tallahassee, FL 32301 tperdue@aif.com

Barry Richard, Esq. Greenberg Traurig, P.A. 101 East College Avenue Tallahassee, FL 32301 Attorneys for Florida Power & Light Company and FPL Employee Intervenors richardb@gtlaw.com

By:

John T. Butler Fla. Bar No. 283479