

Ruth Nettles

100001-EI

From: WELLS, KATHY [Kathy.Wells@fpl.com] on behalf of Goorland, Scott [Scott.Goorland@fpl.com]
Sent: Thursday, March 04, 2010 10:17 AM
To: Filings@psc.state.fl.us
Subject: Electronic Filing / Docket #100001-EI / FPL's Notice of Filing Objections to Staff's 1st INT (1-24) and 1st POD (1-30)
Attachments: 3.4.10.FPL N Service of Objections and Responses to Staff's 1st INTs & 1st PODs.pdf

Electronic Filing

a. Person responsible for this electronic filing:

Scott A. Goorland, Esq.
 700 Universe Boulevard
 Juno Beach, FL 33408
 561-304-5639
scott.goorland@fpl.com

b. Docket No. 100001 - EI
 In RE: Fuel and purchased power cost recovery clause with generating performance incentive factor

c. The Document is being filed on behalf of Florida Power & Light Company.

d. There are a total of 2 pages

e. The document attached for electronic filing is Florida Power & Light Company's Notice of Service of Objections to Staff's First Set of Interrogatories (Nos. 1-14) and First Request for Production of Documents (Nos. 1-30)

Scott A. Goorland, Esq.
 700 Universe Boulevard
 Juno Beach, FL 33408
 561-304-5639
scott.goorland@fpl.com

DOCUMENT NUMBER-DATE
 01495 MAR-4 2010
 FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Fuel and Purchased Power)
Cost Recovery Clause with Generating)
Performance Incentive Factor)

Docket No: 100001-EI

Filed: March 4, 2010

**FLORIDA POWER & LIGHT COMPANY'S NOTICE OF SERVICE OF OBJECTIONS
AND RESPONSES TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-14)
AND FIRST REQUEST FOR PRODUCTION FOR (NOS. 1-30)**

Florida Power & Light Company hereby gives notice of service of its Objections and responses to the Staff of the Florida Public Service Commission's ("Staff's") First Set of Interrogatories (Nos. 1-14) and First Request for Production of Documents (No. 1-30) to Lisa Bennett, counsel for Staff, on March 3, 2010.

R. Wade Litchfield, Esq.
Vice President and Chief Regulatory Counsel
John T. Butler, Esq.
Managing Attorney
Scott A. Goorland, Esq.
Principal Attorney
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Telephone: (561) 304-5633
Facsimile: (561) 691-7135

BY: /s/ Scott A. Goorland

Scott A. Goorland
Fla. Bar No. 0066834

CERTIFICATE OF SERVICE

Docket No. 100001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on March 4, 2010 to the following:

<p>Lisa Bennett, Esq. Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Blvd Tallahassee, Florida 32399-0850 LBENNETT@PSC.STATE.FL.US</p>	<p>J. R. Kelly, Esq. Patricia Christensen, Esq. Charles Beck, Esq. Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, Florida 32399 Kelly.jr@leg.state.fl.us Christensen.patty@leg.state.fl.us beck.charles@leg.state.fl.us</p>
<p>Lee L. Willis, Esq. James D. Beasley, Esq Ausley & McMullen Attorneys for Tampa Electric P.O. Box 391 Tallahassee, Florida 32302 jbeasley@ausley.com lwillis@ausley.com</p>	<p>John T. Burnett, Esq. Progress Energy Service Company, LLC P.O. Box 14042 St. Petersburg, Florida 33733-4042 john.burnett@pgnmail.com</p>
<p>John W. McWhirter, Jr., Esq McWhirter & Davidson, P.A. Attorneys for FIPUG P.O. Box 3350 Tampa, Florida 33602 jmcwhirter@mac-law.com</p>	<p>Beth Keating, Esq. Akerman, Senterfitt Attorneys for FPUC 106 East College Avenue Suite 1200 Tallahassee, Florida 32301 Beth.keating@akerman.com</p>
<p>Jeffrey A. Stone, Esq. Russell A. Badders, Esq. Beggs & Lane Attorneys for Gulf Power P.O. Box 12950 Pensacola, Florida 32576-2950 jas@beggslane.com rab@beggslane.com</p>	<p>James W. Brew, Esq Attorney for White Springs Brickfield, Burchette, Ritts & Stone, The P.C 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, DC 2007-5201 jbrew@bbrslaw.com</p>

<p>Robert Scheffel Wright, Esq Jay T. LaVia, III, Esq Young van Assenderp, P.A Attorneys for Florida Retail Federation 225 South Adams Street, Suite 200 Tallahassee, FL 32301 swright@yvlaw.net jlavia@yvlaw.net</p>	<p>Jon C. Moyle and Vicki Kaufman Keefe, Anchors Gordon & Moyle, P.A. 118 N. Gadsden St. Tallahassee, FL 32301 Co-Counsel for FIPUG vkaufman@kagmlaw.com jmoyle@kagmlaw.com</p>
<p>Cecilia Bradley Senior Assistant Attorney General Office of the Attorney General The Capitol - PL01 Tallahassee, FL 32399-1050 cecilia.bradley@myfloridalegal.com</p>	<p>Michael C. Barrett Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Blvd Tallahassee, Florida 32399-0850 mbarrett@psc.state.fl.us</p>

BY: /s/ Scott A. Goorland
Scott A. Goorland