

**Ruth Nettles**

100009-EI

**From:** Leon, Jack [Jack.Leon@fpl.com]  
**Sent:** Friday, March 26, 2010 1:52 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Anderson, Bryan; Cano, Jessica  
**Subject:** FPL's Notice of Service of Objections to OPC's 1st Set of Interrogatories (Nos. 1-6) and 1st Request for Production of Documents (Nos. 1-20) - Docket No. 100009-EI  
**Attachments:** FPL's Notice of Service of Objections to OPC's 1st INTs (Nos. 1-6) & 1st PODs (Nos. 1-20).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. 100009-EI  
 In re: Nuclear Power Plant  
 Cost Recovery Clause

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 Objections to OPC's 1st Set of Interrogatories (Nos. 1-6) and 1st Request for Production of Documents (Nos. 1-20).

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

02175 MAR 26 0

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Nuclear Power Plant    )  
Cost Recovery Clause        )

Docket No. 100009-EI  
Date: March 26, 2010

**NOTICE OF SERVICE OF FLORIDA POWER & LIGHT COMPANY'S  
OBJECTIONS TO THE OFFICE OF PUBLIC COUNSEL'S  
FIRST SET OF INTERROGATORIES (NOS. 1-6) AND  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-20)**

Florida Power & Light Company gives notice of service of its objections to the Office of Public Counsel's First Set of Interrogatories (Nos. 1-6) and First Request for Production of Documents (No. 1-20), to Joseph McGlothlin.

Respectfully submitted this 26th day of March, 2010.

Bryan S. Anderson, Managing Attorney  
Fla. Auth. House Counsel No. 219511  
Jessica A. Cano, Principal Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
(561)304-5226  
(561) 691-7135 (fax)

By: s/ Jessica A. Cano  
Jessica A. Cano  
Florida Bar No. 0037372

DOCUMENT NUMBER-DATE

02175 MAR 26 2010

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 100009-EI**

I HEREBY CERTIFY that a true and correct copy of this Notice was served electronically and by U.S. Mail this 26th day of March, 2010, to the following:

Anna Williams, Esq.  
Lisa Bennett, Esq.  
Keino Young, Esq.  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850  
[LBENNETT@PSC.STATE.FL.US](mailto:LBENNETT@PSC.STATE.FL.US)  
[KYOUNG@PSC.STATE.FL.US](mailto:KYOUNG@PSC.STATE.FL.US)  
[ANWILLIA@PSC.STATE.FL.US](mailto:ANWILLIA@PSC.STATE.FL.US)

J. Michael Walls, Esq.  
Carlton Fields Law Firm  
P.O. Box 3239  
Tampa, Florida 33601-3239  
[mwalls@carltonfields.com](mailto:mwalls@carltonfields.com)  
Attorney for Progress

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

J. R. Kelly, Esq.  
Charles Rehwinkel, Esq.  
Joseph McGlothlin, Esq.  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399  
[mcglothlin.joseph@leg.state.fl.us](mailto:mcglothlin.joseph@leg.state.fl.us)  
[Kelly.jr@leg.state.fl.us](mailto:Kelly.jr@leg.state.fl.us)  
[Rehwinkel.Charles@leg.state.fl.us](mailto:Rehwinkel.Charles@leg.state.fl.us)

Dianne M. Triplett, Esq.  
Progress Energy Florida  
229 1<sup>st</sup> Avenue N PEF-152  
St. Petersburg, Florida 33701  
[dianne.triplett@pgnmail.com](mailto:dianne.triplett@pgnmail.com)  
Attorney for Progress

John W. McWhirter, Jr., Esq.  
Davidson McWhirter, P.A.  
P.O. Box 3350  
Tampa, Florida 33601  
[jmcwhirter@mac-law.com](mailto:jmcwhirter@mac-law.com)  
Attorney for FIPUG

R. Alexander Glenn, Esq.  
John T. Burnett, Esq.  
Progress Energy Service Company, LLC  
P.O. Box 14042  
St. Petersburg, Florida 33733-4042  
[john.burnett@pgnmail.com](mailto:john.burnett@pgnmail.com)  
[alex.glenn@pgnmail.com](mailto:alex.glenn@pgnmail.com)  
Attorneys for Progress

Randy B. Miller  
White Springs Agricultural Chemicals, Inc.  
Post Office Box 300  
15843 Southeast 78th Street  
White Springs, Florida 32096  
[RMiller@pcsphosphate.com](mailto:RMiller@pcsphosphate.com)

James W. Brew, Esq.  
F. Alvin Tayler, Esq.  
Brickfield, Burchette, Ritts & Stone, P.C.  
1025 Thomas Jefferson Street, NW  
Eighth Floor, West Tower  
Washington, DC 20007-5201  
[jbrew@bbrslaw.com](mailto:jbrew@bbrslaw.com)  
[ataylor@bbrslaw.com](mailto:ataylor@bbrslaw.com)  
Attorneys for PCS Phosphate

Mr. Paul Lewis, Jr.  
106 East College Ave., Suite 800  
Tallahassee, Florida 32301-7740  
[paul.lewisjr@pgnmail.com](mailto:paul.lewisjr@pgnmail.com)

By: s/ Jessica A. Cano  
Jessica A. Cano