

From: Goorland, Scott [Scott.Goorland@fpl.com]
Sent: Wednesday, October 20, 2010 9:54 AM
To: Filings@psc.state.fl.us
Subject: Electronic Filing / Dkt 100001 / FPL's Notice of Objections to Staff's 8th Set of Interrogatories and 3rd Request for Production

Attachments: 10.20.10. FPL N.Objections to Staff's 8th INTs & 3rd PODs.pdf



10.20.10. FPL
Objections to
Electronic Filing

a. Person responsible for this electronic filing:

Scott A. Goorland, Esq.
700 Universe Boulevard
Juno Beach, FL 33408
561-304-5633
scott.goorland@fpl.com<mailto: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 3 pages

e. The document attached for electronic filing is Notice of Florida Power & Light Company's Objections to Staff's Eighth Set of Interrogatories (No. 105) and Third Request for Production of Documents (No. 34)

Scott A. Goorland, Esq.
700 Universe Boulevard
Juno Beach, FL 33408
561-304-5633
scott.goorland@fpl.com<mailto:scott.goorland@fpl.com>

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No: 100001-EI

Date: October 20, 2010

**NOTICE OF FLORIDA POWER & LIGHT COMPANY'S OBJECTIONS TO STAFF'S
EIGHTH SET OF INTERROGATORIES (NO. 105) AND
THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 34)**

Florida Power & Light Company hereby gives notice of service of its objections to the Staff of the Public Service Commission's ("Staff's") Eighth Set of Interrogatories (No. 105) and Third Request for Production of Documents (No. 34) to Lisa Bennett, counsel for Staff, on October 20, 2010.

R. Wade Litchfield, Esq.
Vice President and General 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 October 20, 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>James D. Beasley, Esq. J. Jeffrey Wahlen, Esq. Ausley & McMullen Attorneys for Tampa Electric P.O. Box 391 Tallahassee, Florida 32302 jbeasley@ausley.com jwahlen@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 32591 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, Esq. and Vicki Kaufman, Esq. 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, Esq. Senior Assistant Attorney General Office of the Attorney General The Capitol - PL01 Tallahassee, FL 32399-1050 cecilia.bradley@myfloridalegal.com</p>	<p>Michael Barrett Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Blvd Tallahassee, Florida 32399-0850 MBARRETT@PSC.STATE.FL.US</p>
<p>Captain Shayla L. McNeill Attorney for the FEA AFLOA/JACL-ULFSC 139 Barnes Drive, Suite 1 Tyndall AFB, FL 32403-5319 Shayla.mcneill@tyndall.af.mil</p>	<p>Patrick K. Wiggins, Esq. Attorneys for AFFIRM P.O. Drawer 1657 Tallahassee, FL 32302 wigglaw@gmail.com</p>

By: /s/ Scott A. Goorland
Scott A. Goorland
Fla. Bar No. 0066834