

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Environmental Cost Recovery Clause

Docket No: 160007-EI

Date: October 10, 2016

**FLORIDA POWER & LIGHT COMPANY'S  
NOTICE OF SERVICE OF OBJECTIONS AND RESPONSES  
TO THE STAFF OF THE FLORIDA PUBLIC SERVICE  
COMMISSION'S FIRST SET OF INTERROGATORIES  
AND SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

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") First Set of Interrogatories and First Request for Production of Documents. Pursuant to its *Withdrawal of Discovery* filed October 5, 2016, Staff has withdrawn Interrogatories 1-6 and 8-9 and Requests for Production 1-3. Accordingly, FPL is serving responses only to Interrogatories 7 and 10-22.

Respectfully submitted this 10th day of October 2016.

Respectfully submitted,

John T. Butler  
Assistant General Counsel - Regulatory  
john.butler@fpl.com  
Maria J. Moncada  
Senior Attorney  
maria.moncada@fpl.com  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
Telephone: (561) 304-5795  
Facsimile: (561) 691-7135

By: s/ Maria J. Moncada

Maria J. Moncada  
Florida Bar No. 0773301

**CERTIFICATE OF SERVICE**  
**Docket No. 160007-EI**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished

by electronic service this 10th day of October 2016 to the following:

Charles Murphy, Senior Attorney  
Office of the General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
cmurphy@psc.state.fl.us

Patricia Christensen  
Charles J. Rehwinkel  
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison St., Room 812  
Tallahassee, Florida 32399-1400  
christensen.patty@leg.state.fl.us  
rehwinkel.charles@leg.state.fl.us

James D. Beasley  
J. Jeffrey Wahlen  
Ashley M. Daniels  
Ausley & McMullen  
Attorneys for Tampa Electric Company  
P.O. Box 391  
Tallahassee, Florida 32302  
jbeasley@ausley.com  
jwahlen@ausley.com  
adaniels@ausley.com

Dianne Triplett  
Duke Energy Florida, Inc.  
299 First Avenue North  
St. Petersburg, Florida 33701  
dianne.triplett@duke-energy.com

Matthew R. Bernier, Senior Counsel  
Duke Energy Florida, Inc.  
106 East College Avenue  
Suite 800  
Tallahassee, Florida 32301  
Matthew.bernier@duke-energy.com

Jeffrey A. Stone  
Russell A. Badders  
Steven R. Griffin  
Beggs & Lane  
Attorneys for Gulf Power Company  
P.O. Box 12950  
Pensacola, Florida 32591-2950  
jas@beggslane.com  
rab@beggslane.com  
srg@beggslane.com

James W. Brew  
Laura A. Wynn  
Attorneys for PCS Phosphate - White Springs  
Agricultural Chemicals, Inc.  
Stone Mattheis Xenopoulos & Brew, PC  
1025 Thomas Jefferson St., NW  
Eighth Floor, West Tower  
Washington, DC 20007  
jbrew@smxblaw.com  
laura.wynn@smxblaw.com

Paula K. Brown  
Regulatory Coordination  
Tampa Electric Company  
P.O. Box 111  
Tampa, Florida 33601  
regdept@tecoenergy.com

Robert L. McGee, Jr.  
Regulatory and Pricing Manager  
Gulf Power Company  
One Energy Place  
Pensacola, Florida 32520-0780  
rlmcgee@southernco.com

Jon C. Moyle, Jr.  
The Moyle Law Firm, P.A.  
Attorneys for FIPUG  
118 N. Gadsden Street  
Tallahassee, Florida 32301  
jmoyle@moylelaw.com

By: s/ Maria J. Moncada  
Maria J. Moncada  
Florida Bar No. 0773301