

STATE OF FLORIDA

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OFFICE OF THE GENERAL COUNSEL
KEITH C. HETRICK
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(850) 413-6199

Public Service Commission

October 4, 2019

Mr. Kyle P. Egger
Nearing & Egger, PLLC
2000 S. Dixie Highway, Ste. 112
Miami, FL 33133
Kyle.egger@nearingfirm.com

**STAFF'S FIRST DATA REQUEST TO
PETITIONERS**
via e-mail

RE: Docket No. 2019-0167-EI – Petition to compel Florida Power & Light to comply with Section 366.91, F.S. and Rule 25.6-065, F.A.C., by Floyd Gonzales and Robert Irwin.

Dear Mr. Egger:

By this letter, the Commission staff requests that Floyd Gonzales and Robert Irwin provide responses to the following data requests:

1. Please provide a copy of the construction plans for Petitioners' home that are expected to require electrical consumption beyond historical levels.
2. Please provide a copy of each permit application and/or permit issued for construction identified in response to question 1.
3. What is the time frame for completion of the construction project(s) discussed in response to questions 1 and 2?
4. Please identify any other sources of anticipated additional electrical demand.
5. What is the expected electrical usage at Petitioners' home after the construction project(s) or sources of additional electric demand discussed in response to questions 1-4 are completed or procured?
6. Please identify each step Petitioners have taken in an attempt to reach an interconnection agreement with Florida Power & Light Company, prior to petitioning the Commission, and if applicable, thereafter.
7. Please provide the past twelve months of utility bills from Florida Power & Light Company.

Mr. Kyle P. Egger

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8. Please provide all written communications Petitioners have sent to, or received from, Florida Power & Light Company regarding Petitioners' attempt to enter into an interconnection agreement.
9. Please provide a written summary of any oral and/or electronic communications Petitioners have had with Florida Power & Light Company regarding Petitioners' attempt to enter into an interconnection agreement.

Please file your responses by email to me at cmurphy@psc.state.fl.us no later than October 21, 2019. Please feel free to call me at (850) 413-6191 if you have any questions.

Respectfully,

/s/ Charles Murphy

Charles Murphy
Senior Attorney

CWM/cf

cc: Office of Commission Clerk
Daniel Cordell (dcordell@psc.state.fl.us)