

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Petition by Florida Power & Light )  
Light Company for Rate Unification and for ) DOCKET NO. 20210015-EI  
Base Rate Increase ) SERVED: JUNE 1, 2021  
\_\_\_\_\_)

**NOTICE OF SERVICE OF FLORIDIANS AGAINST INCREASED RATES,  
INC.'S SPECIFIC OBJECTIONS TO FPL'S FIRST SET OF  
INTERROGATORIES (NOS. 1- 28) AND SPECIFIC OBJECTIONS  
TO FPL'S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS  
(NOS. 1-4)**

NOTICE IS HEREBY GIVEN that Floridians Against Increased Rates, Inc. ("FAIR"), by and through undersigned counsel, has served FAIR's Specific Objections to FPL's First Set of Interrogatories (Nos. 1-28) and FAIR's Specific Objections to FPL's First Requests for Production of Documents (Nos. 1-4) on this 1st day of June, 2021.

Respectfully submitted this 1st day of June, 2021.

*/s/Robert Scheffel Wright*

Robert Scheffel Wright

[schef@gbwlegal.com](mailto:schef@gbwlegal.com)

John T. LaVia, III

[jlavia@gbwlegal.com](mailto:jlavia@gbwlegal.com)

Gardner, Bist, Bowden, Dee, LaVia, Wright & Perry, P.A.

1300 Thomaswood Drive

Tallahassee, Florida 32308

Telephone (850) 385-0070

Facsimile (850) 385-5416

Attorneys for Floridians Against Increased Rates, Inc.

## CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 1st day of June, 2021, to the following:

### **Florida Power & Light Company**

Kenneth A. Hoffman  
134 W. Jefferson Street  
Tallahassee, FL 32301  
(850) 521-3901  
(850) 521-3939  
[ken.hoffmann@fpl.com](mailto:ken.hoffmann@fpl.com)  
Represented By: Gulf Power Company

### **Florida Power & Light Company**

Wade Litchfield/John Burnett/Maria  
Moncada  
700 Universe Boulevard  
Juno Beach, FL 33408-0420  
(561) 691-7101  
(561) 691-7135  
[wade.litchfield@fpl.com](mailto:wade.litchfield@fpl.com)  
[john.t.burnett@fpl.com](mailto:john.t.burnett@fpl.com)  
[maria.moncada@fpl.com](mailto:maria.moncada@fpl.com)  
Represented By: Gulf Power  
Company

### **Gulf Power Company (Pensacola)**

Russell A. Badders  
One Energy Place  
Pensacola, FL 32520-0100  
(850) 444-6550  
[Russell.Badders@nexteraenergy.com](mailto:Russell.Badders@nexteraenergy.com)  
Represents: Florida Power & Light  
Company

### **Office of Public Counsel**

Richard Gentry/Patricia A.  
Christensen/Anastacia Pirrello  
c/o The Florida Legislature  
111 W. Madison St., Rm 812  
Tallahassee FL 32399  
(850) 488-9330  
(850) 487-6419  
[christensen.patty@leg.state.fl.us](mailto:christensen.patty@leg.state.fl.us)  
[GENTRY.RICHARD@leg.state.fl.us](mailto:GENTRY.RICHARD@leg.state.fl.us)  
[PIRRELLO.ANASTACIA@leg.state.fl.us](mailto:PIRRELLO.ANASTACIA@leg.state.fl.us)

### **AARP Florida**

Zayne Smith  
360 Central Ave., Suite 1750  
Saint Petersburg, FL 33701  
(850) 228-4243  
[zamith@aarp.org](mailto:zamith@aarp.org)

### **Broward County**

Jason Liechty  
115 S. Andrews Ave., Room 329K  
Fort Lauderdale, FL 33301  
(954) 519-0313  
[JLIECHTY@broward.org](mailto:JLIECHTY@broward.org)

### **Earthjustice**

Bradley Marshall/Jordan Luebke  
111 S. Martin Luther King Jr. Blvd.  
Tallahassee, FL 32301  
(850) 681-0031  
(850) 681-0020  
[bmarshall@earthjustice.org](mailto:bmarshall@earthjustice.org)  
[jluebke@earthjustice.org](mailto:jluebke@earthjustice.org)  
Represents: Florida Rising, Inc./League of  
Latin American Citizens of Florida;  
Environmental Confederation of  
Southwest Florida, Inc.

### **Environmental Confederation of Southwest Florida**

421 Verna Road  
Miami, FL 33193  
Represented By: Earthjustice

### **Federal Executive Agencies**

T. Jernigan/Maj. H. Buchanan/Capt. R.  
Friedman/TSgt. A. Braxton/E. Payton  
139 Barnes Drive, Suite 1  
Tyndall AFB, FL 32403  
(850) 283-6663  
[ebony.payton.ctr@us.af.mil](mailto:ebony.payton.ctr@us.af.mil)  
[thomas.jernigan.3@us.af.mil](mailto:thomas.jernigan.3@us.af.mil)  
[ULFSC.Tyndall@us.af.mil](mailto:ULFSC.Tyndall@us.af.mil)  
[holly.buchanan.1@us.af.mil](mailto:holly.buchanan.1@us.af.mil)  
[robert.friedman.5@us.af.mil](mailto:robert.friedman.5@us.af.mil)  
[arnold.braxton@us.af.mil](mailto:arnold.braxton@us.af.mil)

**Florida Consumer Action Network**

Bill Newton  
[billn@fcan.org](mailto:billn@fcan.org)

**Florida Rising, Inc.**

10800 Biscayne Blvd., Suite 1050  
Miami, FL 33161  
Represented By: Earthjustice

**Southern Alliance for Clean Energy**

P.O. Box 1842  
Knoxville TN 37901  
(865) 637-6055  
Represented By: George Cavros

**Florida Industrial Power Users Group**

Jon C. Moyle, Jr./Karen A. Putnal  
c/o Moyle Law Firm  
118 North Gadsden Street  
Tallahassee, FL 32301  
(850) 681-3828  
(850) 681-8788  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)  
[kputnal@moylelaw.com](mailto:kputnal@moylelaw.com)  
[mqualls@moylelaw.com](mailto:mqualls@moylelaw.com)

**League of United Latin American Citizens of Florida**

6041 SW 159 CT  
Miami, FL 33193  
Represented By: Earthjustice

**Daniel R. and Alexandria Larson**

16933 W. Harlena Dr.  
Loxahatchee FL 33470  
Represented By: Nathan A. Skop

**Florida Retail Federation**

227 South Adams St.  
Tallahassee, FL 32301  
(850) 222-4082  
(850) 226-4082  
Represented by: Stone Law Firm

**Stone Law Firm**

James Brew/Laura Baker/Joseph Briscar  
1025 Thomas Jefferson St., NW, Ste. 800  
West  
Washington DC 20007  
(202) 342-0800  
(202) 342-0807  
[jbrew@smxblaw.com](mailto:jbrew@smxblaw.com)  
[lwb@smxblaw.com](mailto:lwb@smxblaw.com)  
[jrb@smxblaw.com](mailto:jrb@smxblaw.com)  
Represents: Florida Retail Federation

**George Cavros**

120 E. Oakland Park Blvd., Suite 105  
Fort Lauderdale FL 33334  
(954) 295-5714  
[george@cavros-law.com](mailto:george@cavros-law.com)  
Represents: Southern Alliance for Clean Energy

**Vote Solar**

Katie Chiles Ottenweller  
838 Barton Woods Rd. NE  
Atlanta, GA 30307  
(706) 224-8017  
[katie@votesolar.org](mailto:katie@votesolar.org)

**Nathan A. Skop**

420 NW 50th Blvd.  
Gainesville FL 32607  
(561) 222-7455  
[n\\_skop@hotmail.com](mailto:n_skop@hotmail.com)  
Represents: Daniel R. and Alexandria  
Larson

*/s/ Robert Scheffel Wright*

ATTORNEY