

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Florida Power & Light  
Company for Rate Unification and for Base  
Rate Increase

Docket No: 20210015-EI  
Date: June 14, 2021

**FLORIDA POWER & LIGHT COMPANY'S NOTICE OF SERVICE OF  
OBJECTIONS AND RESPONSES TO FLORIDIANS AGAINST INCREASED RATES,  
INC.'S FIRST SET OF INTERROGATORIES (Nos. 1-35) AND  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 1-39)**

Florida Power & Light Company hereby gives notice of service of its Objections and Responses to the Floridians Against Increased Rates, Inc.'s First Set of Interrogatories (Nos. 1-35) and First Request for Production of Documents (Nos. 1-39).

Respectfully submitted,

FLORIDA POWER & LIGHT COMPANY

By: /s/ R. Wade Litchfield

R. Wade Litchfield  
Vice President and General Counsel  
Authorized House Counsel No. 0062190  
[wade.litchfield@fpl.com](mailto:wade.litchfield@fpl.com)  
John T. Burnett  
Vice President and Deputy General Counsel  
Florida Bar No. 173304  
[john.t.burnett@fpl.com](mailto:john.t.burnett@fpl.com)  
Russell Badders  
Vice President and Associate General Counsel  
Florida Bar No. 007455  
[russell.badders@nexteraenergy.com](mailto:russell.badders@nexteraenergy.com)  
Maria Jose Moncada  
Senior Attorney  
Florida Bar No. 0773301  
[maria.moncada@fpl.com](mailto:maria.moncada@fpl.com)  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
(561) 691-7101  
(561) 691-7135 (fax)

**CERTIFICATE OF SERVICE**  
**20210015-EI**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by Hand Delivery\* and/or electronic mail this 14th day of June 2021 to the following parties:

Suzanne Brownless  
Bianca Lherisson  
Shaw Stiller  
Florida Public Service Commission  
Office of the General Counsel  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
sbrownle@psc.state.fl.us  
blheriss@psc.state.fl.us  
sstiller@psc.state.fl.us

Thomas A. Jernigan, GS-13, DAF  
AFIMSC/JA  
Holly L. Buchanan, Maj, USAF  
AF/JAOE-ULFSC  
Robert J. Friedman, Capt., USAF  
Arnold Braxton, TSgt, USAF  
Ebony M. Payton  
Scott L. Kirk, Maj, USAF  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base, Florida 32403  
[ULFSC.Tyndall@us.af.mil](mailto:ULFSC.Tyndall@us.af.mil)  
[thomas.jernigan.3@us.af.mil](mailto:thomas.jernigan.3@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)  
[ebony.payton.ctr@us.af.mil](mailto:ebony.payton.ctr@us.af.mil)  
[scott.kirk.2@us.af.mil](mailto:scott.kirk.2@us.af.mil)  
**Attorneys for Federal Executive  
Agencies**

Office of Public Counsel  
Richard Gentry  
Patricia A. Christensen  
Anastacia Pirrello  
c/o The Florida Legislature  
111 W. Madison St., Rm 812  
Tallahassee FL 32399-1400  
gentry.richard@leg.state.fl.us  
[christensen.patty@leg.state.fl.us](mailto:christensen.patty@leg.state.fl.us)  
[pirrello.anastacia@leg.state.fl.us](mailto:pirrello.anastacia@leg.state.fl.us)  
**Attorneys for the Citizens  
of the State of Florida**

Jon C. Moyle, Jr.  
Karen A. Putnal  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, Florida 32301  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)  
[kputnal@moylelaw.com](mailto:kputnal@moylelaw.com)  
[mqualls@moylelaw.com](mailto:mqualls@moylelaw.com)  
**Attorneys for Florida Industrial Power  
Users Group**

James W. Brew  
Laura Wynn Baker  
Joseph R. Briscar  
Stone Mattheis Xenopoulos & Brew,  
PC  
1025 Thomas Jefferson St, NW  
Suite 800 West  
Washington, D.C. 20007  
[jbrew@smxblaw.com](mailto:jbrew@smxblaw.com)  
[lwb@smxblaw.com](mailto:lwb@smxblaw.com)  
[jrb@smxblaw.com](mailto:jrb@smxblaw.com)  
**Attorneys for Florida Retail  
Federation**

Nathan A. Skop, Esq.  
420 NW 50th Blvd.  
Gainesville, FL 32607  
[n\\_skop@hotmail.com](mailto:n_skop@hotmail.com)  
**Attorney for Mr. & Mrs. Daniel R.  
Larson**

Katie Chiles Ottenweller  
Southeast Director  
Vote Solar  
838 Barton Woods Road  
Atlanta, GA 30307  
[katie@votesolar.org](mailto:katie@votesolar.org)  
**Attorney for Vote Solar**

George Cavros  
Southern Alliance for Clean Energy  
120 E. Oakland Park Blvd., Suite 105  
Fort Lauderdale, Florida 33334  
[george@cavros-law.com](mailto:george@cavros-law.com)  
**Attorney for Southern Alliance for  
Clean Energy**

Bradley Marshall  
Jordan Luebke  
Earthjustice  
111 S. Martin Luther King Jr. Blvd.  
Tallahassee, Florida 32301  
[bmarshall@earthjustice.org](mailto:bmarshall@earthjustice.org)  
[jluebke@earthjustice.org](mailto:jluebke@earthjustice.org)

Christina I. Reichert  
Earthjustice  
4500 Biscayne Blvd., Ste. 201  
Miami, FL 33137  
[creichert@earthjustice.org](mailto:creichert@earthjustice.org)  
[flcaseupdates@earthjustice.org](mailto:flcaseupdates@earthjustice.org)  
**Attorneys for Florida Rising, Inc.  
League of United Latin American  
Citizens of Florida  
Environmental Confederation of  
Southwest Florida, Inc.**

Robert Scheffel Wright  
John T. LaVia, III  
Gardner, Bist, Bowden, Dee, LaVia,  
Wright & Perry, P.A.  
1300 Thomaswood Drive  
Tallahassee, Florida 32308  
[schef@gbwlegal.com](mailto:schef@gbwlegal.com)  
[jlavia@gbwlegal.com](mailto:jlavia@gbwlegal.com)  
**Attorneys for Floridians Against  
Increased Rates, Inc.**

William C. Garner  
Law Office of William C. Garner,  
PLLC  
3425 Bannerman Road  
Unit 105, #414  
Tallahassee, FL 32312  
[bgarner@wcglawoffice.com](mailto:bgarner@wcglawoffice.com)  
**Attorney for The CLEO Institute  
Inc.**

Barry A. Naum  
SPILMAN THOMAS & BATTLE,  
PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
[bnaum@spilmanlaw.com](mailto:bnaum@spilmanlaw.com)  
**Attorney for Walmart**

Stephanie U. Eaton  
SPILMAN THOMAS & BATTLE,  
PLLC  
110 Oakwood Drive, Suite 500  
Winston-Salem, NC 27103  
[seaton@spilmanlaw.com](mailto:seaton@spilmanlaw.com)  
**Attorney for Walmart**

By: /s/ R. Wade Litchfield  
R. Wade Litchfield  
Authorized House Counsel No. 0062190