

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Sally, by Gulf Power Company.

Docket No: 20200241-EI

In re: Petition for evaluation of Hurricane Isaias and Tropical Storm Eta storm costs, by Florida Power & Light Company.

Date: January 28, 2022

In re: Petition for limited proceeding for recovery of incremental storm restoration costs and associated true-up process related to Hurricane Zeta, by Gulf Power Company.

**GULF POWER COMPANY AND FLORIDA POWER & LIGHT COMPANY'S
COMBINED NOTICE OF SERVICE OF OBJECTIONS AND PARTIAL RESPONSES
TO THE OFFICE OF PUBLIC COUNSEL'S FIRST SET OF INTERROGATORIES
FOR ORIGINAL DOCKET NUMBER 20200241 (NOS. 9,17, 25, 27, 29-31,35, 36);
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS FOR ORIGINAL
DOCKET NUMBER 20200241 (NOS. 9, 12,15-17, 19-22, 28, 35-37, 39-43); FIRST SET OF
INTERROGATORIES FOR DOCKET NUMBER 20210178 (NOS 8 AND 29); FIRST SET
OF REQUEST FOR PRODUCTION OF DOCUMENTS FOR DOCKET NUMBER
20210178 (NOS. 3, 6, 7, 10, 16, 21, 29-31, 33, 34); FIRST SET OF
INTERROGATORIES FOR DOCKET NUMBER 20210179 (NOS. 11,16,21-23, 25, 27-29);
AND FIRST SET OF REQUEST FOR PRODUCTION OF DOCUMENTS
FOR DOCKET NUMBER 20210179 (NOS. 3,6,12-15,21,26,28-30,32-35)**

Gulf Power Company¹ and Florida Power & Light Company hereby gives notice of service of their combined objections and partial responses to the Office of Public Counsel's First Set of Interrogatories for original docket number 20200241 (Nos. 9,17, 25, 27, 29-31,35, 36), Second Request for Production of Documents for original docket number 20200241 (Nos. 9, 12,15-17, 19-22, 28, 35-37, 39-43), First Set of Interrogatories for docket number 20210178 (Nos. 8 and 29),

¹ At the time Hurricane Sally impacted the service area formerly served by Gulf, and at the time the instant Petition was filed with the Commission, Gulf was a subsidiary of NextEra Energy, Inc. and operated as a ratemaking entity separate and distinct from Florida Power & Light Company. Gulf no longer exists as a corporate entity, and effective January 1, 2022, Gulf no longer exists as a separate ratemaking entity. However, the storm surcharge requested in this proceeding, to the extent approved by the Commission, will be applied to northwest Florida customers of Florida Power & Light Company. As a result, to avoid confusion, petitioner will continue to use the name of the former Gulf Power Company for filings made in this proceeding.

First Request for Production of Documents for docket number 20210178 (Nos. 3, 6, 7, 10, 16, 21, 29-31, 33, 34), First Set of Interrogatories for docket number 20210179 (Nos. 11,16,21-23, 25, 27-29), and First Request for Production of Documents for docket number 20210179 (Nos. 3,6,12-15,21,26,28-30,32-35).

Respectfully submitted,

GULF POWER COMPANY
FLORIDA POWER & LIGHT COMPANY

By: /s/ Kenneth M. Rubin

Kenneth M. Rubin
Assistant General Counsel
Florida Bar No. 349038
Ken.Rubin@fpl.com
Kate Cotner
Principal Attorney
Florida Bar No. 60581
Kate.Cotner@fpl.com

Gulf Power Company
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 33408-0420
(561) 691-2512
(561) 691-7135 (fax)

CERTIFICATE OF SERVICE
20200241-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail this 28th day of January, 2022 to the following parties:

Public Service Commission
Office of General Counsel
Shaw Stiller
Jennifer Crawford
Ryan Sandy
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
sstiller@psc.state.fl.us
jcrawfor@psc.state.fl.us
rsandy@psc.state.fl.us

Office of Public Counsel
Richard Gentry
Patricia A. Christensen
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
**Attorneys for the Citizens
of the State of Florida**

