

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.

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

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

Docket No. 20200241-EI
Docket No. 20210178-EI
Docket No. 20210179-EI

Date: March 22, 2022

FLORIDA POWER & LIGHT COMPANY AND GULF POWER COMPANY'S NOTICE OF SERVICE OF OBJECTIONS AND RESPONSES TO THE OFFICE OF PUBLIC COUNSEL'S: (1) SECOND SET OF INTERROGATORIES TO GULF POWER (NOS. 37-42) AND THIRD REQUEST FOR PRODUCTION OF DOCUMENTS TO GULF POWER (NOS. 44-51) IN DOCKET NO. 20200241-EI; (2) SECOND (MISLABELLED FIRST) SET OF INTERROGATORIES TO FPL (NOS. 36-44) AND SECOND (MISLABELLED FIRST) REQUEST FOR PRODUCTION OF DOCUMENTS TO FPL (NOS. 35-43) IN DOCKET NO. 20210178-EI; AND (3) SECOND SET OF INTERROGATORIES TO GULF POWER (NOS. 33-41) AND SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO GULF POWER (NOS. 36-43) IN DOCKET NO. 20210179-EI

Florida Power & Light Company ("FPL") and Gulf Power Company¹("Gulf") hereby give notice of service of objections and responses to the following discovery propounded by the Office of Public Counsel ("OPC"):

1. OPC's Second Set of Interrogatories to Gulf (Nos. 37-42) in Docket No. 20200241-EI;

¹ At the time Hurricane Sally and Hurricane Zeta impacted the service area formerly served by Gulf, and at the time the instant Petitions were 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 surcharges 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 in this proceeding.

2. OPC's Third Request for Production of Documents to Gulf (Nos. 44-51) in Docket No. 20200241-EI;
3. OPC's Second (misabeled First) Set of Interrogatories to FPL (Nos. 36-44) in Docket No. 20210178-EI;
4. OPC's Second (misabeled First) Request for Production of Documents to FPL (Nos. 34-43) in Docket No. 20210178-EI;
5. OPC's Second Set of Interrogatories to Gulf (Nos. 33-41) in Docket No. 20210179-EI; and
6. OPC's Second Request for Production of Documents to Gulf (Nos.36-46) in Docket No. 20210179-EI.

Respectfully submitted,

FLORIDA POWER & LIGHT COMPANY
GULF POWER COMPANY

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CERTIFICATE OF SERVICE

Docket No. 20200241-EI

Docket No. 20210178-EI

Docket No. 20210179-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail this 22nd day of March 2022 to the following:

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