

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

Date: April 20, 2022

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

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 NOTICE OF SERVICE OF OBJECTIONS AND RESPONSES TO (1) THE OFFICE OF PUBLIC COUNSEL'S ("OPC") FIFTH SET OF INTERROGATORIES, Nos. 50-68 IN DOCKET NO. 20200241-EI; (2) OPC'S FIFTH SET OF INTERROGATORIES, Nos. 53-54 AND FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS, No. 48 IN DOCKET NO. 20210178-EI; AND (3) OPC'S FOURTH SET OF INTERROGATORIES, Nos. 44-45 AND THIRD REQUEST FOR PRODUCTION OF DOCUMENTS, No. 47 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 Fifth Set of Interrogatories to Gulf (Nos. 50-68) 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 Fifth Set of Interrogatories to FPL (Nos. 53-54) in Docket No. 20210178-EI;
3. OPC's Fourth Request for Production of Documents to FPL (No. 48) in Docket No. 20210178-EI;
4. OPC's Fourth Set of Interrogatories to Gulf (Nos. 44-45) in Docket No. 20210179-EI;
and
5. OPC's Third Request for Production of Documents to Gulf (No. 47) in Docket No. 20210179-EI.

Respectfully submitted,

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

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 20th day of April 2022 to the following:

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

Richard Gentry
Patricia A. Christensen
Anastacia Pirrello
Sarah Lewis
Office of Public Counsel
111 W. Madison Street, Room 812
Tallahassee, Florida 32399
Gentry.richard@leg.state.fl.us
Christensen.patty@leg.state.fl.us
Pirrello.anastacia@leg.state.fl.us
Lewis.sarah@leg.state.fl.us

s/ Kate Cotner

Kate Cotner