

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Review of Storm Protection Plan,  
pursuant to Rule 25-6.030, F.A.C., Florida  
Power & Light Company

Docket No. 20220051-EI

Served: May 26, 2022

**FLORIDA POWER & LIGHT COMPANY'S  
NOTICE OF SERVICE OF OBJECTIONS AND RESPONSES TO  
OFFICE OF PUBLIC COUNSEL'S FIFTH SET INTERROGATORIES (64-66) AND  
FIRTH REQUEST FOR PRODUCTION OF DOCUMENTS (32-33)**

Florida Power & Light Company hereby gives notice of service of its Objections and Responses to the Office of Public Counsel's Fifth Set of Interrogatories (64-66) and Fifth Request for Production of Documents (32-33).

Respectfully submitted this 26th day of May 2022,

Christopher T. Wright  
Senior Attorney  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408-0420  
Phone: 561-691-7144  
Fax: 561-691-7135  
Email: [christopher.wright@fpl.com](mailto:christopher.wright@fpl.com)

*s/ Christopher T. Wright*

\_\_\_\_\_  
Christopher T. Wright  
Fla. Auth. House Counsel No. 1007055

*Attorney for Florida Power & Light Company*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 26<sup>th</sup> day of May 2022:

<p>Walter Trierweiler, Esquire Theresa Lee Eng Tan, Esquire Jacob Imig, Esquire Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 <a href="mailto:wtrierwe@psc.state.fl.us">wtrierwe@psc.state.fl.us</a> <a href="mailto:jimig@psc.state.fl.us">jimig@psc.state.fl.us</a> <a href="mailto:ltan@psc.state.fl.us">ltan@psc.state.fl.us</a> <b><i>For Commission Staff</i></b></p>	<p>Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 <a href="mailto:Gentry.richard@leg.state.fl.us">Gentry.richard@leg.state.fl.us</a> <a href="mailto:rehwinkel.charles@leg.state.fl.us">rehwinkel.charles@leg.state.fl.us</a> <a href="mailto:morse.stephanie@leg.state.fl.us">morse.stephanie@leg.state.fl.us</a> <a href="mailto:wessling.mary@leg.state.fl.us">wessling.mary@leg.state.fl.us</a> <a href="mailto:christensen.patty@leg.state.fl.us">christensen.patty@leg.state.fl.us</a> <b><i>For Office of Public Counsel</i></b></p>
<p>J. Jeffrey Wahlen Malcolm M. Means Ausley McMullen Post Office Box 391 Tallahassee, Florida 32302 <a href="mailto:jwahlen@ausley.com">jwahlen@ausley.com</a> <a href="mailto:mmeans@ausley.com">mmeans@ausley.com</a></p> <p>Ms. Paula K. Brown Regulatory Affairs P. O. Box 111 Tampa FL 33601-0111 <a href="mailto:regdept@tecoenergy.com">regdept@tecoenergy.com</a> <b><i>For Tampa Electric Company</i></b></p>	<p>Dianne M. Triplett Deputy General Counsel Duke Energy Florida, LLC 299 First Avenue North St. Petersburg, FL 33701 <a href="mailto:Dianne.Triplett@Duke-Energy.com">Dianne.Triplett@Duke-Energy.com</a></p> <p>Matthew R. Bernier Robert L. Pickels Stephanie A. Cuello 106 E. College Avenue, Suite 800 Tallahassee FL 32301 <a href="mailto:FLRegulatoryLegal@duke-energy.com">FLRegulatoryLegal@duke-energy.com</a> <a href="mailto:matthew.bernier@duke-energy.com">matthew.bernier@duke-energy.com</a> <a href="mailto:robert.pickels@duke-energy.com">robert.pickels@duke-energy.com</a> <a href="mailto:stephanie.cuello@duke-energy.com">stephanie.cuello@duke-energy.com</a> <b><i>For Duke Energy Florida, LLC</i></b></p>
<p>Beth Keating Gunster, Yoakley &amp; Stewart, P.A. 215 South Monroe St., Suite 601 Tallahassee, FL 32301 <a href="mailto:BKeating@gunster.com">BKeating@gunster.com</a></p> <p>Mr. Mike Cassel 208 Wildlight Ave. Yulee FL 32097 (904) 491-4361 <a href="mailto:mcassel@fpuc.com">mcassel@fpuc.com</a> <b><i>For Florida Public Utilities Company</i></b></p>	<p>James W. Brew/Laura Wynn Baker Stone Law Firm 1025 Thomas Jefferson St., NW, Eighth Floor, West Tower Washington DC 20007 (202) 342-0800 (202) 342-0807 <a href="mailto:jbrew@smxblaw.com">jbrew@smxblaw.com</a> <a href="mailto:lwb@smxblaw.com">lwb@smxblaw.com</a> <b><i>For PCS Phosphate – White Springs</i></b></p>

<p>Jon C. Moyle, Jr. Karen A. Putnal Moyle Law Firm, P.A. 118 North Gadsden Street Tallahassee, Florida 32301 <a href="mailto:jmoyle@moylelaw.com">jmoyle@moylelaw.com</a> <a href="mailto:kputnal@moylelaw.com">kputnal@moylelaw.com</a> <a href="mailto:mqualls@moylelaw.com">mqualls@moylelaw.com</a> <i>For Florida Industrial Power Users Group</i></p>	
--	--

*s/ Christopher T. Wright*  
Christopher T. Wright  
Fla. Auth. House Counsel No. 1007055

*Attorney for Florida Power & Light Company*