

# ORIGINAL

BEFORE THE PUBLIC SERVICE COMMISSION

DISTRIBUTION CENTER  
06 DEC 21 AM 7:23

In re: Requirement for investor-owned electric  
Utilities to file ongoing storm preparedness  
plans and implementation cost estimates.

DOCKET NO. 060198-EI  
SERVED: 12/18/06  
FLORIDA BAR NO.: 0173071

## PETITIONER CITY OF NORTH MIAMI'S RESPONSE TO FPL'S REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW the Defendant, City of North Miami (City), a Florida municipal corporation, by and through its undersigned counsel, and by way of response to the Plaintiffs' Request for Production propounded on November 28, 2006 states:

CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
RCA \_\_\_\_\_  
SCR \_\_\_\_\_  
SGA \_\_\_\_\_  
SEC 1 \_\_\_\_\_  
OTH \_\_\_\_\_

1. Documentation responsive to Interrogatories 1, 5, 24, 32 and 33 are attached hereto.
2. Objection, Work Product. Without waiving the objection, none.
3. Objection, Work Product.
4. Please refer to production of documents.
5. Please refer to production of documents.
6. Please refer to production of documents.
8. Please refer to production of documents.
9. Please refer to production of documents.
10. Please refer to production of documents.

RECEIVED-FPSC  
06 DEC 21 AM 9:22  
COMMISSION  
CLERK

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via U.S. Mail and electronic mail on this 18<sup>th</sup> day of December, 2006 to: John T. Butler, Esq., FPL, 700 Universe Blvd., Juno Beach, Florida 33408-0420 and to Rosanne Gervasi, Esq., Office of the General Counsel, Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850.

Respectfully submitted,

OFFICE OF THE CITY  
ATTORNEY  
V. LYNN WHITFIELD  
CITY OF NORTH MIAMI

RECEIVED & FILED

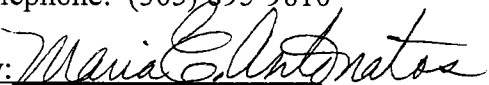
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11648 DEC 21 06

FPSC-COMMISSION CLERK

776 N.E. 125<sup>th</sup> Street  
North Miami, FL 33161  
Telephone: (305) 895-9810

By:   
MARIA E. ANTONATOS  
ASSISTANT CITY ATTORNEY  
FLORIDA BAR NO. 0173071