

ORIGINAL

**Dorothy Menasco**

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**From:** Jack Leon [Jack\_Leon@fpl.com]  
**Sent:** Wednesday, March 21, 2007 4:01 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Wade\_Litchfield@fpl.com; Natalie\_Smith@fpl.com; Bryan\_Anderson@fpl.com; Sabrina\_Spradley@fpl.com  
**Subject:** Electronic Filing for Docket No. 070098-EI / FPL's Notice of Service of Objections to Staff's 3rd Request for Production of Documents (No. 15) and Staff's 3rd Set of Interrogatories (Nos. 71-104)  
  
**Attachments:** FPL's Notice of Service of Objections to Staff's 3rd Request for Production of Documents (No. 15) and 3rd Set of Interrogatories (Nos. 71-104)\_3-21-07.doc



FPL's Notice of  
Service of Obj...

**Electronic Filing**

**a. Person responsible for this electronic filing:**

Joaquin E. Leon, Esq.  
9250 W. Flagler St., Suite 6514  
Miami, FL 33174  
(305) 552-3922  
jack\_leon@fpl.com

**b. Docket No. 070098-EI**

In re: Florida Power & Light Company's Petition to Determine Need for FPL Glades Power Park Units 1 and 2 Electrical Power Plant

**c. Documents are being filed on behalf of Florida Power & Light Company.**

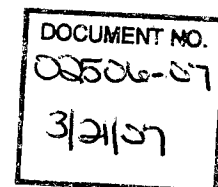
**d. There are a total of 2 pages in the attached document.**

**e. The document attached for electronic filing is Florida Power & Light Company's Notice of Service of Objections to Staff's 3rd Request for Production of Documents (No. 15) and Staff's 3rd Set of Interrogatories (Nos. 71-104).**

(See attached file: FPL's Notice of Service of Objections to Staff's 3rd Request for Production of Documents (No. 15) and 3rd Set of Interrogatories (Nos. 71-104)\_3-21-07.doc)

Thank you for your attention and cooperation to this request.

Jack Leon  
Senior Attorney  
9250 W. Flagler St., Suite 6514  
Miami, FL 33174  
(305) 552-3922  
Fax: (305) 552-3865  
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**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Florida Power & Light Company's	)	Docket No: 070098-EI
Petition to Determine Need for FPL Glades	)	Filed: March 21, 2007
Power Park Units 1 and 2 Electrical Power Plant	)	

**NOTICE OF SERVICE  
OF FLORIDA POWER & LIGHT COMPANY'S OBJECTIONS  
TO THE STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION'S  
THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 15)  
AND THIRD SET OF INTERROGATORIES (NOS. 71-104)**

Florida Power & Light Company ("FPL") gives notice of service of its Objections to the Staff of the Florida Public Service Commission's Third Request for Production of Documents (No. 15) and Third Set of Interrogatories (Nos. 71-104), to Lorena A. Holley, Esquire, with a copy to all counsel on the attached Certificate of Service.

Respectfully submitted this 21<sup>st</sup> day of March, 2007.

R. Wade Litchfield  
Associate General Counsel  
Bryan S. Anderson  
Natalie F. Smith  
Attorneys for Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
Telephone: (561) 691-7207  
Facsimile: (561) 691-7135

By: s/ Natalie F. Smith  
Natalie F. Smith  
Florida Bar No. 470200

DOCUMENT NUMBER-DATE  
**02510 MAR 21 5**  
FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail and United States Mail on the 21<sup>st</sup> day of March, 2007, to the following:

Katherine E. Fleming, Esquire \*  
Jennifer Brubaker, Esquire  
Lorena A. Holley, Esquire  
Florida Public Service Commission  
Division of Legal Services  
Gerald L. Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Michael A. Gross, Esquire \*  
Earthjustice  
P.O. Box 1329  
Tallahassee, FL 32302  
Attorney for The Sierra Club, Inc., et al.

Office of Public Counsel \*  
Charles J. Beck, Esquire  
Deputy Public Counsel  
c/o The Florida Legislature  
111 W. Madison St., Room 812  
Tallahassee, FL 32399-1400

Department of Community Affairs \*\*  
Valerie Hubbard, Director  
Division of Community Planning  
2555 Shumard Oak Blvd.  
Tallahassee, FL 32399-2100

Black & Veatch \*\*  
Myron Rollins  
11401 Lamar Avenue  
Overland Park, KS 66211

Department of Environmental Protection\*\*  
Michael P. Halpin  
Siting Coordination Office  
2600 Blairstone Road MS 48  
Tallahassee, FL 32301

By: s/ Natalie F. Smith  
Natalie F. Smith  
Florida Bar No. 470200

\* Electronic version

\*\* Indicates interested party