

Dorothy Menasco

From: Rhonda Dulgar [rdulgar@yvlaw.net]
Sent: Friday, July 20, 2007 3:59 PM
To: Beth Keating; James Meza; James D. Beasley; Lee L. Willis; Jeffrey Stone; Russell Badders; Nancy Sims; Charles Falcone; Richard Jackson; Maria Browne; Susan Masterton; Bill Walker; John T. Butler; Douglas Sale; Martin Rollins; Gene Adams; John T. Burnett; Paul Lewis, Jr.; Adam Teitzman; Filings@psc.state.fl.us; Keino Young; Lorena Holley; Susan Ritenour; Paula Brown; Donald Hubbs; Thomas Bradford; David Christian; Dulaney O'Roark; Dennis Hayward; Schef Wright
Subject: Electronic Filing - Docket 070301-EI
Attachments: MUUC.1stRFPstoATT.NOS.7-20-07.doc

ORIGINAL

- a. Person responsible for this electronic filing:

John T. LaVia, III
 Young van Assenderp, P.A.
 225 South Adams Street, Suite 200
 Tallahassee, FL 32301
 (850) 222-7206
jlavia@yvlaw.net

- b. Docket No. 070301-EI

In Re: Review of 2007 Electric Infrastructure Storm Hardening Plan Filed pursuant to Rule 25-6.0342, Florida Administrative Code, Submitted by Florida Power & Light Company.

- c. Document being filed on behalf of the Municipal Underground Utilities Constortium.

- d. There are a total of 3 pages.

- e. The document attached for electronic filing is Notice of Service of First Set of Requests for Production of Documents (Nos. 1-4) to BellSouth Telecommunications, Inc., dba AT&T Florida Propounded by the Municipal Underground Utilities Consortium.

(see attached file: MUUC.1stRFPstoATT.NOS.7-20-07.doc)

Thank you for your attention and assistance in this matter.

Rhonda Dulgar
 Secretary to Jay LaVia
 Phone: 850-222-7206
 FAX: 850-561-6834

DOCUMENT NUMBER-DATE

06193 JUL 20 6

FPSC-COMMISSION CLERK

7/20/2007

ORIGINAL

BEFORE THE PUBLIC SERVICE COMMISSION

In Re: Review of 2007 Electric)
Infrastructure Storm Hardening Plan)
Filed pursuant to Rule 25-6.0342,) DOCKET NO. 070301-EI
Florida Administrative Code,)
Submitted by Florida Power &) FILED July 20, 2007
Light Company.)
_____)

NOTICE OF SERVICE OF FIRST SET OF REQUESTS FOR PRODUCTION OF
DOCUMENTS (NOS. 1-4) TO BELLSOUTH TELECOMMUNICATIONS, INC.
DBA AT&T FLORIDA PROPOUNDED BY
THE MUNICIPAL UNDERGROUND UTILITIES CONSORTIUM

The Municipal Underground Utilities Consortium ("MUUC") files notice that it has served its First Set of Requests for Production of Documents (Nos. 1-4) to BellSouth Telecommunications, Inc. dba AT&T Florida ("ATT"), by e-mail and U.S. Mail this July 20th, 2007 on the following:

AT&T Florida
James Meza
c/o Nancy H. Sims
150 South Monroe Street
Suite 400
Tallahassee, FL 32301-1556

S/John T. LaVia, III
Robert Scheffel Wright
Florida Bar No. 966721
John T. LaVia, III
Florida Bar No. 853666
Young van Assenderp, P.A.
225 South Adams Street, Suite 200
Tallahassee, Florida 32301
(850) 222-7206 Telephone
(850) 561-6834 Facsimile

Attorneys for the Municipal Underground
Utilities Consortium

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail and U.S. Mail on this 20th day of July, 2007, on the following:

Lorena Holley, Esquire
Keino Young, Esquire
Adam Teitzman, Esquire
Rick Mann, Esquire
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

AT&T Florida
J.Meza/E.Edenfield/
P.Carver/M.Gurdian
c/o Nancy H. Sims
150 South Monroe Street
Suite 400
Tallahassee, FL 32301-1556

Florida Power & Light Company
John T. Butler
700 Universe Boulevard
Juno Beach, FL 33408-0420

Florida Power & Light Company
Mr. Bill Walker
215 South Monroe Street
Suite 810
Tallahassee, FL 32301-1859

Beggs & Lane Law Firm
Jeffrey Stone
Russell Badders
P.O. Box 12950
Pensacola, FL 32591

Gulf Power Company
Ms. Susan D. Ritenour
One Energy Place
Pensacola, FL 32520-0780

Progress Energy Florida, Inc.
Mr. Paul Lewis, Jr.
106 East College Avenue, Suite 800
Tallahassee, FL 32301-7740

Progress Energy Service
Company, LLC
John T. Burnett
P.O. Box 14042
St. Petersburg, FL 33733-4042

Ausley Law Firm
Lee L. Willis
James D. Beasley
Post Office Box 391
Tallahassee, FL 32302

Tampa Electric Company
Ms. Paula K. Brown
Regulatory Affairs
P. O. Box 111
Tampa, FL 33601-0111

Akerman Law Firm
Beth Keating
106 East College Avenue, Suite 1200
Tallahassee, FL 32301

Harrison Law Firm
Douglas J. Sale
Post Office Drawer 1579
Panama City, FL 32402-1579

City of Panama City Beach and PCB
Comm. Redevelop. Agency
Richard Jackson
110 South Arnold Road
Panama City Beach, FL 32413

Embarq Florida, Inc.
Susan S. Masterton
Mailstop: FLTLHO0102
1313 Blair Stone Rd.
Tallahassee, FL 32301

H. M. Rollins, P.E.
c/o H. M. Rollins Company, Inc.
P. O Box 3471
Gulfport, MS 39505

Time Warner Telecom of Florida, LP
Howard E. Adams
Peter M. Dunbar
c/o Pennington Law Firm
P.O. Box 10095
Tallahassee, FL 32302-2095

Town of Palm Beach, Florida
Thomas G. Bradford, Deputy Town Mgr
360 South County Road
Palm Beach, FL 33480

Davis Law Firm
Maria T. Browne
1919 Pennsylvania Ave., NW
Suite 200
Washington, DC 20006

Florida Cable
Telecommunications
Association, Inc.
246 E. 6th Avenue, Suite 100
Tallahassee, FL 32303

North American Wood Pole
Council
Dennis Hayward
7017 NE Highway 99, Suite 108
Vancouver, WA 98665

Town of Jupiter Island
Mayor Charles Falcone
Donald R. Hubbs, Asst Town
Manager
Post Office Box 7
Hobe Sound, FL 33475

Verizon Florida LLC
Mr. David Christian
106 East College Avenue
Suite 710
Tallahassee, FL 32301-7721

Verizon Florida LLC
Dulaney L. O'Roark III
6 Concourse Parkway
Suite 600
Atlanta, GA 30328

S/John T. LaVia, III
Attorney