

Ruth Nettles

From: ljacobs50@comcast.net
Sent: Thursday, June 11, 2009 6:40 PM
To: Filings@psc.state.fl.us
Cc: Katherine Fleming; Alex Glenn; Brenda Buchan; Byron Knibbs; C. Browder; Carla Pettus; Charles Beck; Jack English; J.R. Kelly; Jack Leon; James D. Beasley; Jeremy Susac; Joe Eysie; John T. Burnett; Myron Rollins; Natalie Futch Smith; Norman H. Horton; Paul Lewis; Paula K. Brown; Randy Halley; Richard J. Vento; Steven Griffin; Susan Clark; sandra.brice@pgnmail.com; Susan Ritenour; Suzanne Brownless; Teala Milton; Wade_Litchfield; April Vicary
Subject: NRDC-SACE Notice of Service of Second Request for Production of Documents
Attachments: Notice of Svc 2nd POD Final.pdf

1. Person Responsible for Filing:

E. Leon Jacobs, Jr.
Williams & Jacobs
1720 S. Gadsden St. MS 14
Tallahassee, FL 32301

2. Documents Filed on Behalf of NRDC and SACE:

Notice of Service of NRDC-SACE Second Request for Production of Documents (Nos. 4-13)

3. This document contains four (4) pages.

DOCUMENT NUMBER-DATE

05881 JUN 12 8

FPSC-COMMISSION CLERK

WILLIAMS & JACOBS, LLC

ATTORNEYS AT LAW
1720 S. GADSDEN ST. MS. 14
TALLAHASSEE, FL 32301

MOSES WILLIAMS, ESQ.

E. LEON JACOBS, JR., ESQ.

June 11, 2009

Ann Cole
Director, Office of the Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Blvd
Tallahassee, Florida 32399-0850

RE: Docket No. 080407-EG Florida Power & Light Company;
Docket No. 080408-EG Progress Energy, Florida, Inc. ;
Docket No. 080409-EG Tampa Electric Company;
Docket No. 080410-EG Gulf Power Company ;
Docket No. 080411-EG Florida Public Utilities Company;
Docket No. 080412-EG Orlando Utilities C; and
Docket No. 080413-EG Jacksonville Electric Authority

Dear Ms. Cole:

On behalf of the Southern Alliance for Clean Energy, and the Natural Resources Defense Council, I have enclosed for filing Notice of Service of NRDC-SACE Second Request for Production of Documents (Nos. 4-13) on the parties in the above-stated dockets. I thank you for your attention to this matter.

Sincerely,

/s/ E. Leon Jacobs, Jr.

E. Leon Jacobs, Jr.
Attorney for Intervenors

Enclosures

DOCUMENT NUMBER-DATE

05881 JUN 12 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission Review of Numeric) DOCKET NO. 080407-EG
Conservation Goals)
Florida Power & Light Company)
_____)

In re: Commission Review of Numeric) DOCKET NO. 080408-EG
Conservation Goals)
Progress Energy, Florida, Inc.)
_____)

In re: Commission Review of Numeric) DOCKET NO. 080409-EG
Conservation Goals)
Tampa Electric Company)
_____)

In re: Commission Review of Numeric) DOCKET NO. 080410-EG
Conservation Goals)
Gulf Power Company)
_____)

In re: Commission Review of Numeric) DOCKET NO. 080411-EG
Conservation Goals)
Florida Public Utilities Company)
_____)

In re: Commission Review of Numeric) DOCKET NO. 080412-EG
Conservation Goals)
Orlando Utilities Commission)
_____)

In re: Commission Review of Numeric) DOCKET NO. 080413-EG
Conservation Goals)
Jacksonville Electric Authority)
_____)

NOTICE OF SERVICE OF
INTERVENORS NATURAL RESOURCES DEFENSE COUNCIL AND
SOUTHERN ALLIANCE FOR CLEAN ENERGY, INC.
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 4-13)

NOTICE IS HEREBY GIVEN that Intervenor, the Natural Resources Defense Council and the Southern Alliance for Clean Energy, Inc., by and through their undersigned attorney, have on the 11th day of June, 2009, filed their Second Request for Production of Documents (Nos. 4-13) upon Florida Power & Light Company, Progress Energy Florida, Inc., Gulf Power

DOCUMENT NUMBER-DATE

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Company, Inc., Tampa Electric Company, Inc., Florida Public Utilities Company, Inc., the Orlando Utilities Commission and the Jacksonville Electric Authority. NRDC-SACE is requesting an expedited schedule for responses, as opposed to the time period set out in **Order No. PSC-08-0816-PCO-EG**.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy and correct copy of the foregoing was served on this 11th day of June, 2009 via email (*) and/or US Mail on:

<p>Katherine Fleming, Esq. * Erik L. Slayer, Esq. * Florida Public Service Commission Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 <u>KEFLEMIN@PSC.STATE.FL.US</u> <u>esayler@PSC.STATE.FL.US</u></p>	<p>J.R. Kelly / Stephen Burgess * Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 <u>kelly.jr@leg.state.fl.us</u></p>
<p>Jack Leon, Esq., * Wade Litchfield, Esq. * Florida Power & Light Company 215 S. Monroe Street, Suite 810 Tallahassee, Florida 32301-1859 <u>Jack.Leon@PEF.com</u> <u>Wade_Litchfield@PEF.com</u></p>	<p>Mr. Paul Lewis, Jr. * Progress Energy Florida 106 East College Avenue, Suite 800 Tallahassee, FL 32301-7740 <u>paul.lewisjr@pgnmail.com</u></p>
<p>John T. Burnett / R. Alexander Glenn * Progress Energy Service Company, LLC Post Office Box 14042 St. Petersburg, FL 33733-4042 <u>john.burnett@pgnmail.com</u></p>	<p>Paula K. Brown * Tampa Electric Company Regulatory Affairs P. O. Box 111 Tampa, FL 33601-0111 <u>regdept@tecoenergy.com</u></p>
<p>Susan D. Ritenour * Gulf Power Company One Energy Place Pensacola, FL 32520-0780 <u>sdriteno@southernco.com</u></p>	<p>John T. English Florida Public Utilities Company P. O. Box 3395 West Palm Beach, FL 33402-3395</p>
<p>Chris Browder * Orlando Utilities Commission P. O. Box 3193 Orlando, FL 32802-3193 <u>cbrowder@ouc.com</u></p>	<p>Teala M. Milton * JEA V.P., Government Relations 21 West Church Street, Tower 16 Jacksonville, FL 32202-3158 <u>milta@jea.com</u></p>
<p>Suzanne Brownless, Esq. * 1975 Buford Boulevard Tallahassee, FL 32308 <u>suzannebrownless@comcast.net</u> James D. Beasley, Esq., *</p>	<p>Jeremy Susac * Florida Energy Commission 600 South Calhoun Street, Suite 251 Tallahassee, FL 32399-001 <u>jeremy.susac@eog.myflorida.com</u></p>

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This 11th day of June, 2009.

_/s/ E. Leon Jacobs, Jr.

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