

MEMORANDUM

JULY 26, 2010

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COMMISSION
CLERK

TO: OFFICE OF COMMISSION CLERK
FROM: LISA C. BENNETT, ATTORNEY *LCB*
RE: DOCKET NO. 100009-EI

Attached are the redacted versions of Staff's Seventh Set of Interrogatories and Third Request for Production of Documents to Florida Power and Light Company. The un-redacted versions with the confidential information highlighted in yellow, have been provided to the Clerk under separate cover memo.

LCB
Attachment

DOCUMENT NUMBER - DATE

06090 JUL 26 2010

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear cost recovery clause.

DOCKET NO. 100009-EI

DATED: JULY 26, 2010

STAFF'S SEVENTH SET OF INTERROGATORIES TO
FLORIDA POWER & LIGHT COMPANY (NOS. 20-44)

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, propounds the following interrogatories, pursuant to Rule 1.340, Florida Rules of Civil Procedure, to Florida Power & Light Company (FPL). These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served as provided by the Rules of Civil Procedure, and within the time period set out in Order No. PSC-10-0115-PCO-EI. As provided by Rule 1.340(a), Florida Rules of Civil Procedure, each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it.

Give the name, address, and relationship to FPL of those persons providing the answers to each of the following interrogatories.

If an interrogatory contained herein asks for information that has already been provided or is in the process of being provided to the Commission through a Commission audit, please so state, indicating the date provided and the audit document/record request number.

DEFINITIONS

"You", "your", "Company" or "FPL" refers to Florida Power & Light Company, its employees and authorized agents.

"FPSC" or "Commission" refers to the Florida Public Service Commission.

REDACTED

DOCUMENT NUMBER DATE

06090 JUL 26 09

FPSC-COMMISSION CLERK

CONFIDENTIAL

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software.

“Identify” means:

- (a) With respect to a person, to state the person’s name, address and business relationship (e.g., “employee”) to the Company;
- (b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

INTERROGATORIES

20.

[REDACTED]

21.

[REDACTED]

22.

[REDACTED]

23.

[REDACTED]

24.

[REDACTED]

25.

[REDACTED]

26.

[REDACTED]

27.

[REDACTED]

28.

[REDACTED]

29.

[REDACTED]

30.

[REDACTED]

31.

[REDACTED]

32.

[REDACTED]

33.

[REDACTED]

34.

[REDACTED]

35.

[REDACTED]

36.

[REDACTED]

37.

[REDACTED]

38.

[REDACTED]

The following interrogatories 39–44 are in reference to Pressure Discrepancies discussed on page 34 of Commission staff's *Review of FPL's Project Management Internal Controls for Nuclear Plant Uprate and Construction Projects*, dated July 2010.

39. Describe the circumstances and the date FPL first noted the discrepancies.


40. Could FPL have found those discrepancies earlier than the date listed in response to the above interrogatory? If not, why not?

41. Did FPL or Siemens provide the original specifications for the main steam design pressure used for the Siemens design upgrade?

42. Name the person, including his/her position and title, who signed off on the original engineering requirements of the main steam design pressure used for the Siemens design upgrade project.

43. Was the original design pressure upgrade checked against the actual plant parameters? If so, state the name of the person, including his/her position and title, who checked. If not, explain why it was not.

44. What was the cost of the turbine upgrade contract prior to the contract change?


KEINO YOUNG
Senior Attorney
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FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
(850) 413-6226

AFFIDAVIT

STATE OF FLORIDA)

COUNTY OF _____)

I hereby certify that on this _____ day of _____, 2010, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared _____, who is personally known to me, and he/she acknowledged before me that he/she provided the answers to interrogatory number(s) _____ from STAFF'S SEVENTH SET OF INTERROGATORIES TO FLORIDA POWER & LIGHT COMPANY (NOS. 20-44) in Docket No. 100009-EI, and that the responses are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this _____ day of _____, 2010.

Notary Public
State of Florida, at Large

My Commission Expires:

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear cost recovery clause.

DOCKET NO. 100009-EI

DATED: JULY 26, 2010

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one correct unredacted copy of STAFF'S SEVENTH SET OF INTERROGATORIES TO FLORIDA POWER & LIGHT COMPANY (NOS. 20-44) have been served by hand delivery to Lynne Adams, Florida Power & Light Company, 215 S. Monroe St., Tallahassee, FL 32301 and that an unredacted version has been filed with the Office of Commission Clerk at 2540 Shumard Oak Blvd., Tallahassee, FL 32399. A redacted copy has been furnished to the following electronically and by U. S. mail this 26th day of July, 2010:

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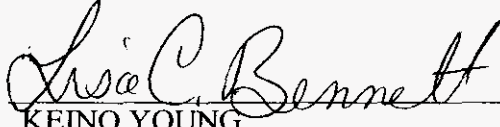
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for 
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(850) 413-6226

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear cost recovery clause.

DOCKET NO. 100009-EI

DATED: JULY 26, 2010

STAFF'S FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS
TO FLORIDA POWER & LIGHT COMPANY (NOS. 21-32)

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, the Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby serves the following Request for Production of Documents upon Florida Power & Light Company (FPL).

Please produce the following documents at the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, no later than twenty days after service of this request for the purpose of inspection and copying.

DEFINITIONS

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or record, including but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intraoffice, handwritten or other notes, working paper, draft, application, permit, chart, paper, graph, survey, index, tape, disc, data sheet or data processing card, computer printout, or any other written, recorded, transcribed, filed or graphic matter, however produced or reproduced.

DOCUMENT NUMBER-DATE

06090 JUL 26 0

FPSC-COMMISSION CLERK

CONFIDENTIAL
REDACTED

DOCUMENTS REQUESTED

21. Please provide copies of all written communication described in response to Interrogatory

21.

22. Please provide copies of all written communication described in response to Interrogatory

23.

23. Please provide copies of all written communication described in response to Interrogatory

24.

24.

[REDACTED]

STAFF'S FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS
TO FLORIDA POWER & LIGHT COMPANY (NOS. 21-32)
DOCKET NO. 100009-EI
PAGE 4

25. Please provide copies of all written communication described in response to interrogatory

27.

26. Please provide copies of all written communication described in response to interrogatory

28.

27. Please provide copies of all written communication described in response to interrogatory

29.

28.

[REDACTED]

29.

[REDACTED]

30.

[REDACTED]

31.

[REDACTED]

32.

[REDACTED]

Lisa C. Bennett
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear cost recovery clause.

DOCKET NO. 100009-E1

DATED: JULY 26, 2010

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one correct unredacted copy of STAFF'S FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA POWER & LIGHT COMPANY (NOS. 21-32) have been served by hand delivery to Lynne Adams, Florida Power & Light Company, 215 S. Monroe St., Tallahassee, FL 32301 and that an unredacted version has been filed with the Office of Commission Clerk at 2540 Shumard Oak Blvd., Tallahassee, FL 32399. A redacted copy has been furnished to the following electronically and by U. S. mail this 26th day of July, 2010:

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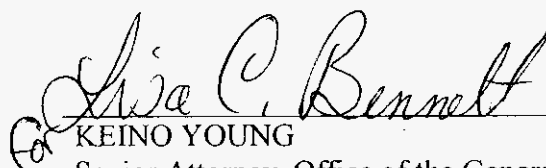
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