

**Eric Fryson**

---

**From:** Leon, Jack [Jack.Leon@fpl.com]  
**Sent:** Thursday, May 31, 2012 12:54 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Anderson, Bryan; Cano, Jessica; Lee, David  
**Subject:** FPL's Notice of Service of Objections to Staff's 2nd Set of Interrogatories (Nos. 3-36) & 1st Request for Production of Documents (Nos. 1-10) - Docket No. 120009-EI  
**Attachments:** FPL's Notice of Service of Objections to Staff's 2nd INTs (Nos. 3-36) & 1st PODs (Nos. 1-10)\_5-31-12.pdf

**Electronic Filing**

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

Joaquin E. Leon, Esquire  
Florida Power & Light Company  
4200 W. Flagler St., Suite 2113  
Miami, FL 33134  
(305) 442-5930  
[jack.leon@fpl.com](mailto:jack.leon@fpl.com)

**b. Docket No. 120009-EI**  
In re: Nuclear Power Plant  
Cost Recovery Clause

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

**d. There are a total of 3 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 2nd Set of Interrogatories (Nos. 3-36) & 1st Request for Production of Documents (Nos. 1-10).**

Thank you for your attention and cooperation to this request.

Jack Leon  
Managing Attorney  
Florida Power & Light Company  
4200 W. Flagler Street, Suite 2113  
Miami, Florida 33134  
(305) 442-5930  
Fax: (305) 552-4911  
Cell: (305) 439-1661

**The FPL Law Department is proud to be an ABA-EPA Law Office Climate Challenge Partner. Please think before you print!**

The information contained in this electronic message is confidential information intended only for the use of the named recipient(s) and may be the subject of attorney-client privilege. If the reader of this electronic message is not the named recipient, or the employee or agent responsible to deliver it to the named recipient, you are hereby notified that any dissemination, distribution, copying or other use of this communication is strictly prohibited and no privilege is waived. If you have received this communication in error, please immediately notify us by telephone (305) 442-5930 or by replying to this electronic message. Thank you

DOCUMENT NUMBER DATE

03504 MAY 31 2012

FPSC-COMMISSION CLERK

5/31/2012

**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Nuclear Power Plant    )  
Cost Recovery Clause        )

Docket No. 120009-EI

Date: May 31, 2012

**NOTICE OF SERVICE OF FLORIDA POWER & LIGHT COMPANY'S OBJECTIONS  
TO STAFF OF THE FLORIDA PUBLIC SERVICE COMMISSION'S  
SECOND SET OF INTERROGATORIES (NOS. 3-36) AND  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-10)**

Florida Power & Light Company gives notice of service of its Objections to Staff of the Florida Public Service Commission's Second Set of Interrogatories (Nos. 3-36) and First Request for Production of Documents (Nos. 1-10), to Keino Young.

Respectfully submitted this 31st day of May, 2012.

Bryan S. Anderson  
Jessica A. Cano  
Attorneys for Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
(561) 304-5226  
(561) 691-7135 (fax)

By: s/ Jessica A. Cano  
Jessica A. Cano  
Florida Bar No. 0037372

DOCUMENT NUMBER 120009-EI

03504 MAY 31 2012

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE  
DOCKET NO. 120009-EI**

I HEREBY CERTIFY that a true and correct copy of FPL's Notice of Service of Objections to Staff's Second Set of Interrogatories and First Request for Production of Documents was served electronically and via U.S. Mail this 31st day of May, 2012, to the following:

Keino Young, Esq.  
Michael Lawson, Esq.  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850  
[KYOUNG@PSC.STATE.FL.US](mailto:KYOUNG@PSC.STATE.FL.US)  
[MLAWSON@PSC.STATE.FL.US](mailto:MLAWSON@PSC.STATE.FL.US)

J. R. Kelly, Esq.  
Charles Rehwinkel, Esq.  
Joseph McGlothlin, Esq.  
Erik L. Sayler, Esq.  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, Florida 32399  
[Kelly.jr@leg.state.fl.us](mailto:Kelly.jr@leg.state.fl.us)  
[Rehwinkel.Charles@leg.state.fl.us](mailto:Rehwinkel.Charles@leg.state.fl.us)  
[mcglothlin.joseph@leg.state.fl.us](mailto:mcglothlin.joseph@leg.state.fl.us)  
[Sayler.Erik@leg.state.fl.us](mailto:Sayler.Erik@leg.state.fl.us)

J. Michael Walls, Esq.  
Blaise N. Gamba, Esq.  
Carlton Fields Law Firm  
P.O. Box 3239  
Tampa, Florida 33601-3239  
[mwalls@carltonfields.com](mailto:mwalls@carltonfields.com)  
[bgamba@carltonfields.com](mailto:bgamba@carltonfields.com)  
Attorneys for Progress

R. Alexander Glenn, Esq.  
John T. Burnett, Esq.  
Dianne M. Triplett, Esq.  
Progress Energy Service Company, LLC  
P.O. Box 14042  
St. Petersburg, Florida 33733-4042  
[john.burnett@pgnmail.com](mailto:john.burnett@pgnmail.com)  
[alex.glenn@pgnmail.com](mailto:alex.glenn@pgnmail.com)  
[dianne.triplett@pgnmail.com](mailto:dianne.triplett@pgnmail.com)  
Attorneys for Progress

Matthew Bernier, Esq.  
Carlton Fields Law Firm  
215 S. Monroe Street, Ste. 500  
Tallahassee, Florida 32301  
[mbernier@carltonfields.com](mailto:mbernier@carltonfields.com)

Mr. Paul Lewis, Jr.  
106 East College Ave., Suite 800  
Tallahassee, Florida 32301-7740  
[paul.lewisjr@pgnmail.com](mailto:paul.lewisjr@pgnmail.com)

Jon C. Moyle, Jr., Esq.  
Vicki Gordon Kaufman, Esq.  
Keefe Anchors Gordon & Moyle, PA  
118 North Gadsden Street  
Tallahassee, Florida 32301  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)  
[vkaufman@moylelaw.com](mailto:vkaufman@moylelaw.com)  
Attorneys for FIPUG

James W. Brew, Esq.  
F. Alvin Taylor, Esq.  
Brickfield, Burchette, Ritts & Stone, P.C.  
1025 Thomas Jefferson Street, NW  
Eighth Floor, West Tower  
Washington, DC 20007-5201  
[jbrew@bbrslaw.com](mailto:jbrew@bbrslaw.com)  
[ataylor@bbrslaw.com](mailto:ataylor@bbrslaw.com)  
Attorneys for PCS Phosphate

Randy B. Miller  
White Springs Agricultural Chemicals, Inc.  
Post Office Box 300  
15843 Southeast 78th Street  
White Springs, Florida 32096  
[RMiller@pcsphosphate.com](mailto:RMiller@pcsphosphate.com)

Gary A. Davis, Esq.  
James S. Whitlock, Esq.  
Davis & Whitlock, P.C.  
P.O. Box 649  
Hot Springs, NC 28743  
[gadavis@enviroattorney.com](mailto:gadavis@enviroattorney.com)  
[jwhitlock@enviroattorney.com](mailto:jwhitlock@enviroattorney.com)

Robert Scheffel Wright  
John T. LaVia, III  
Gardner, Bist, Wiener, Wadsworth, Bowden,  
Bush, Dee, LaVia & Wright, P.A.  
1300 Thomaswood Drive  
Tallahassee, FL 32308  
[schef@gbwlegal.com](mailto:schef@gbwlegal.com)  
[jlavia@gbwlegal.com](mailto:jlavia@gbwlegal.com)  
Attorneys for the Florida Retail Federation

Captain Samuel Miller  
USAF/AFLOA/JACL/ULFSC  
139 Barnes Drive, Suite 1  
Tyndall AFB, FL 32403-5319  
[Samuel.Miller@Tyndall.af.mil](mailto:Samuel.Miller@Tyndall.af.mil)

By: s/ Jessica A. Cano  
Jessica A. Cano  
Florida Bar No. 0037372