

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for rate increase by Florida  
Power & Light Company

---

DOCKET NO.: 160021-EI  
FILED: June 15, 2016

**NOTICE OF SERVICE OF FLORIDA INDUSTRIAL POWER USERS GROUP'S  
OBJECTIONS TO FLORIDA POWER & LIGHT COMPANY'S  
FIRST SET OF INTERROGATORIES (NOS. 1-16) AND  
REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-3)**

PLEASE TAKE NOTICE that the Florida Industrial Power Users Group by and through its undersigned counsel, hereby serves its Objections to Florida Power and Light Company's First set of Interrogatories (Nos. 1-16) and Request for Production of Documents (Nos. 1-3) upon Florida Power and Light Company, together with the officers, employees, consultants, agents, representatives, attorneys, affiliated companies and any other person or entity acting on behalf of the Company.

*/s/ Jon C. Moyle*

---

Jon C. Moyle, Jr.  
Karen A. Putnal  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, Florida 32301  
Telephone: (850)681-3828  
Facsimile: (850)681-8788  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)  
[kputnal@moylelaw.com](mailto:kputnal@moylelaw.com)

Attorneys for Florida Industrial Power Users Group

**CERTIFICATE OF SERVICE**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished

by electronic mail this 15<sup>th</sup> day of June, 2016, to the following:

Martha Barrera  
Suzanne Brownless  
Florida Public Service Commission  
2540 Shumard Oak Blvd., Room 110  
Tallahassee, FL 32399-0850  
[sbrownle@psc.state.fl.us](mailto:sbrownle@psc.state.fl.us)  
[mbarrera@psc.state.fl.us](mailto:mbarrera@psc.state.fl.us)

R. Wade Litchfield  
John T. Butler  
Maria J. Moncada  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408  
[wade.litchfield@fpl.com](mailto:wade.litchfield@fpl.com)  
[john.butler@fpl.com](mailto:john.butler@fpl.com)  
[maria.moncada@fpl.com](mailto:maria.moncada@fpl.com)

Ken Hoffman  
Florida Power & Light Company  
215 South Monroe Street, Suite 810  
Tallahassee, Florida 32399-1400  
[Ken.hoffman@fpl.com](mailto:Ken.hoffman@fpl.com)

J.R. Kelly, Esq.  
Charles J. Rehwinkel  
John Truitt  
Patricia Christensen  
Office of Public Counsel  
111 West Madison Street, room 812  
Tallahassee, FL 32301  
[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)  
[truitt.john@leg.state.fl.us](mailto:truitt.john@leg.state.fl.us)  
[Christensen.patty@leg.state.fl.us](mailto:Christensen.patty@leg.state.fl.us)

Derrick Price Williamson  
Spilman Thomas & Battle, PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
[dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)

Stephanie U. Roberts  
Spilman Thomas & Battle, PLLC  
110 Oakwood Drive, Suite 500  
Winston-Salem, NC 27103  
[sroberts@spilmanlaw.com](mailto:sroberts@spilmanlaw.com)

Kenneth Wiseman  
Mark Sundback  
William M. Rappolt  
Andrews Kurth LLP  
1350 I Street NW, Suite 1100  
Washington, D.C. 20005  
[kwiseman@andrewskurth.com](mailto:kwiseman@andrewskurth.com)  
[msundback@andrewskurth.com](mailto:msundback@andrewskurth.com)  
[wrappolt@andrewskurth.com](mailto:wrappolt@andrewskurth.com)

Federal Executive Agencies  
Thomas A. Jernigan  
AFCEC/JA-ULFSC  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base, FL 32403  
[Thomas.Jernigan.3@us.af.mil](mailto:Thomas.Jernigan.3@us.af.mil)

*/s/ Jon C. Moyle*  
\_\_\_\_\_  
Jon C. Moyle, Jr.