BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Sally, by Gulf Power Company.

In re: Petition for evaluation of Hurricane Isaias and Tropical Storm Eta storm costs, by Florida Power & Light Company.

In re: Petition for limited proceeding for recovery of incremental storm restoration costs and associated true-up process related to Hurricane Zeta, by Gulf Power Company. Docket No: 20200241-EI Docket No. 20210178-EI Docket No. 20210179-EI

Date: April 4, 2022

GULF POWER COMPANY AND FLORIDA POWER & LIGHT COMPANY'S NOTICE OF SERVICE OF OBJETIONS AND RESPONSES TO (1) THE OFFICE OF PUBLIC COUNSEL'S ("OPC") THIRD SET OF INTERROGATORIES, Nos. 43-47 AND FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS, Nos. 52-56 IN DOCKET NO. 20200241-EI; AND (2) OPC'S THIRD SET OF INTERROGATORIES, Nos. 45-48 AND THIRD REQUEST FOR PRODUCTION OF DOCUMENTS, Nos. 44-47 IN DOCKET NO. 20210178-EI.

Florida Power & Light Company ("FPL") and Gulf Power Company¹ ("Gulf') hereby

give notice of service of objections and responses to the following discovery propounded by the

Office of Public Counsel ("OPC"):

- 1. OPC's Third Set of Interrogatories to Gulf (Nos. 43-47) in Docket No. 20200241-EI;
- 2. OPC's Fourth Request for Production of Documents to Gulf (Nos. 52-56) in Docket

No. 20200241-EI;

¹ At the time Hurricane Sally and Hurricane Zeta impacted the service area formerly served by Gulf, and at the time the instant Petitions were filed with the Commission, Gulf was a subsidiary of NextEra Energy, Inc. and operated as a ratemaking entity separate and distinct from Florida Power & Light Company. Gulf no longer exists as a corporate entity, and effective January I, 2022, Gulf no longer exists as a separate ratemaking entity. However, the storm surcharges requested in this proceeding, to the extent approved by the Commission, will be applied to northwest Florida customers of Florida Power & Light Company. As a result, to avoid confusion, petitioner will continue to use the name of the former Gulf Power Company in this proceeding.

- OPC's Third Set of Interrogatories to FPL (Nos. 45-48) in Docket No. 20210178-EI; and
- OPC's Third Request for Production of Documents to FPL (Nos. 44-47) in Docket No. 20210178-EI.

Respectfully submitted,

FLORIDA POWER & LIGHT COMPANY GULF POWER COMPANY

By: /s/ Kenneth M. Rubin Kenneth M Rubin Assistant General Counsel Florida Bar No. 349038 <u>Ken.Rubin@fpl.com</u> Kate Cotner Principal Attorney Florida Bar No. 60581 <u>Kate.Cotner@fpl.com</u> Florida Power & Light Company Gulf Power Company 700 Universe Boulevard Juno Beach, Florida 33408-0420 (561) 691-2512 (561) 691-7135 (fax)

CERTIFICATE OF SERVICE Docket No. 20200241-EI Docket No. 20210178-EI Docket No. 20210179-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by

electronic mail this 4th day of April 2022 to the following:

Public Service Commission Office of General Counsel Shaw Stiller Jennifer Crawford Ryan Sandy 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 sstiller@psc.state.fl.us jcrawfor@psc.state.fl.us rsandy@psc.state.fl.us Richard Gentry Patricia A. Christensen Anastacia Pirrello Office of Public Counsel 111 W. Madison Street, Room 812 Tallahassee, Florida 32399 Gentry.richard@leg.state.fl.us Christensen.patty@leg.state.fl.us Pirrello.anastacia@leg.state.fl.us

s/Kate Cotner

Kate Cotner