

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

DOCKET NO.: 20250011-EI

FILED: July 1, 2025

**NOTICE OF SERVICE OF CITIZENS' RESPONSE TO STAFF'S  
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 3)**

Pursuant to Section 350.0611, Florida Statutes, the Citizens of the State of Florida, by and through undersigned counsel, submit the following Response to the Second Request for Production of Documents (No. 3) propounded by Staff of the Florida Public Service Commission ("Staff"), on the 13<sup>th</sup> day of June, 2025.

Respectfully submitted,

Walt Trierweiler  
Public Counsel  
Florida Bar No.: 912468

*/s/ Austin A. Watrous*  
Austin A. Watrous  
Associate Public Counsel  
Florida Bar No.: 1044249

Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Suite 812  
Tallahassee, FL 32399-1400

*Attorneys for the Citizens  
of the State of Florida*

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 20250011-EI**

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 1<sup>st</sup> day of July, 2025, to the following:

Shaw Stiller  
Timothy Sparks  
Florida Public Service Commission  
Office of General Counsel  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
sstiller@psc.state.fl.us  
tsparks@psc.state.fl.us  
discovery-gcl@psc.state.fl.us

Kenneth A. Hoffman  
Florida Power & Light Company  
134 West Jefferson Street  
Tallahassee, FL 32301-1713  
ken.hoffman@fpl.com

John T. Burnett  
Maria Moncada  
Christopher T. Wright  
Joel Baker  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408-0420  
john.t.burnett@fpl.com  
maria.moncada@fpl.com  
christopher.wright@fpl.com  
joel.baker@fpl.com

Jon C. Moyle, Jr.  
Karen A. Putnal  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, FL 32301  
jmoyle@moylelaw.com  
kputnal@moylelaw.com  
mqualls@moylelaw.com

Leslie R. Newton  
Ashley N. George  
Thomas A. Jernigan  
Michael A. Rivera  
James B. Ely  
Ebony M. Payton  
Federal Executive Agencies  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base, FL 32403  
leslie.newton.1@us.af.mil  
ashley.george.4@us.af.mil  
thomas.jernigan.3@us.af.mil  
michael.rivera.51@us.af.mil  
james.ely@us.af.mil  
ebony.payton.ctr@us.af.mil

Nikhil Vijaykar  
Yonatan Moskowitz  
Keyes & Fox LLP  
580 California St., 12th Floor  
San Francisco, CA 94104  
nvijaykar@keyesfox.com  
ymoskowitz@keyesfox.com

Katelyn Lee  
Lindsey Stegall  
EVgo Services, LLC  
1661 E. Franklin Ave.  
El Segundo, CA 90245  
katelyn.lee@evgo.com  
lindsey.stegall@evgo.com

Bradley Marshall  
Jordan Luebke  
Earthjustice  
111 S. Martin Luther King Jr. Blvd.  
Tallahassee, FL 32301  
bmarshall@earthjustice.org  
jluebke@earthjustice.org  
flcaseupdates@earthjustice.org

Danielle McManamon  
Earthjustice  
4500 Biscayne Blvd., Suite 201  
Miami, FL 33137  
dmcmanamon@earthjustice.org

James W. Brew  
Laura Wynn Baker  
Joseph R. Briscar  
Sarah B. Newman  
Stone Mattheis Xenopoulos & Brew  
1025 Thomas Jefferson St., NW  
Suite 800 West  
Washington, D.C. 20007  
jbrew@smxblaw.com  
lwb@smxblaw.com  
jrb@smxblaw.com  
sbn@smxblaw.com

Stephen Bright  
Jigar J. Shah  
Electrify America, LLC  
1950 Opportunity Way, Suite 1500  
Reston, Virginia  
steve.bright@electrifyamerica.com  
jigar.shah@electrifyamerica.com

Robert E. Montejo  
Duane Morris LLP  
201 S Biscayne Blvd., Suite 3400  
Miami, FL 33131-4325  
remontejo@duanemorris.com

Stephanie U. Eaton  
Spilman Thomas & Battle  
110 Oakwood Drive, Suite 500  
Winston-Salem, NC 27103  
seaton@spilmanlaw.com

Steven W. Lee  
Spilman Thomas & Battle  
1100 Bent Creek Blvd., Suite 101  
Mechanicsburg, PA 17050  
slee@spilmanlaw.com

William C. Garner  
Law Office of William C. Garner  
3425 Bannerman Road  
Unit 105, No. 414  
Tallahassee, FL 32312  
bgarner@wcglawoffice.com

D. Bruce May  
Kevin W. Cox  
Kathryn Isted  
Holland & Knight LLP  
315 S. Calhoun Street, Suite 600  
Tallahassee, FL 32301  
bruce.may@hklaw.com  
kevin.cox@hklaw.com  
kathryn.isted@hklaw.com

Robert Scheffel Wright  
John T. LaVia, III  
Gardner, Bist, Bowden, Dee, LaVia,  
Wright, Perry & Harper  
1300 Thomaswood Drive  
Tallahassee, FL 32308  
schef@gbwlegal.com  
jlavia@gbwlegal.com

Floyd R. Self  
Ruth Vafek  
Berger Singerman, LLP  
313 N. Monroe Street, Suite 301  
Tallahassee, FL 32301  
fself@bergersingerman.com  
rvafek@bergersingerman.com

Brian A. Ardire  
Armstrong World Industries, Inc.  
2500 Columbia Avenue  
Lancaster, PA 17603  
baardire@armstrongceilings.com

Alexander W. Judd  
Duane Morris LLP  
100 Pearl Street, 13th Floor  
Hartford, CT 06103  
ajudd@duanemorris.com

/s/ Austin A. Watrous  
Austin A. Watrous  
Associate Public Counsel  
watrous.austin@leg.state.fl.us