

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition by Florida Power & Light  
Company for Rate Unification and for Base  
Rate Increase

Docket No: 20210015-EI

Date: June 2, 2021

**FLORIDA POWER & LIGHT COMPANY'S NOTICE OF SERVICE OF OBJECTIONS  
AND RESPONSES TO THE CLEO INSTITUTE, INC. AND VOTE SOLAR'S FIRST  
SET OF INTERROGATORIES (NOS. 30, 47, 49, 50, 54, 75, 77 & 80) AND FIRST  
REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1)**

Florida Power & Light Company hereby gives notice of service of its objections and responses to the CLEO Institute, Inc. and Vote Solar's First Set of Interrogatories (Nos. 30, 47, 49, 50, 54, 75, 77 & 80) and First Request for Production of Documents (No. 1).

Respectfully submitted,

FLORIDA POWER & LIGHT COMPANY

By: /s/ R. Wade Litchfield

R. Wade Litchfield  
Vice President and General Counsel  
Authorized House Counsel No. 0062190  
wade.litchfield@fpl.com  
John T. Burnett  
Vice President and Deputy General Counsel  
Florida Bar No. 173304  
john.t.burnett@fpl.com  
Russell Badders  
Vice President and Associate General Counsel  
Florida Bar No. 007455  
russell.badders@nexteraenergy.com  
Maria Jose Moncada  
Senior Attorney  
Florida Bar No. 0773301  
maria.moncada@fpl.com  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, Florida 33408-0420  
(561) 691-7101  
(561) 691-7135 (fax)

**CERTIFICATE OF SERVICE**  
**20210015-EI**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail this 2nd day of June 2021 to the following parties:

Suzanne Brownless  
Bianca Lherisson  
Shaw Stiller  
Florida Public Service Commission  
Office of the General Counsel  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
sbrownle@psc.state.fl.us  
blheriss@psc.state.fl.us  
sstiller@psc.state.fl.us

Office of Public Counsel  
Richard Gentry  
Patricia A. Christensen  
Anastacia Pirrello  
c/o The Florida Legislature  
111 W. Madison St., Rm 812  
Tallahassee FL 32399-1400  
gentry.richard@leg.state.fl.us  
christensen.patty@leg.state.fl.us  
pirrello.anastacia@leg.state.fl.us  
**Attorneys for the Citizens  
of the State of Florida**

James W. Brew  
Laura Wynn Baker  
Joseph R. Briscar  
Stone Mattheis Xenopoulos & Brew, PC  
1025 Thomas Jefferson St, NW  
Suite 800 West  
Washington, D.C. 20007  
jbrew@smxblaw.com  
lwb@smxblaw.com  
jrb@smxblaw.com  
**Attorneys for Florida Retail Federation**

Thomas A. Jernigan, GS-13, DAF AFIMSC/JA  
Holly L. Buchanan, Maj, USAF AF/JAOE-  
ULFSC  
Robert J. Friedman, Capt., USAF  
Arnold Braxton, TSgt, USAF  
Ebony M. Payton  
Scott L. Kirk, Maj, USAF  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base, Florida 32403  
ULFSC.Tyndall@us.af.mil  
thomas.jernigan.3@us.af.mil  
holly.buchanan.1@us.af.mil  
robert.friedman.5@us.af.mil  
arnold.braxton@us.af.mil  
ebony.payton.ctr@us.af.mil  
scott.kirk.2@us.af.mil  
**Attorneys for Federal Executive Agencies**

Jon C. Moyle, Jr.  
Karen A. Putnal  
Moyle Law Firm, P.A.  
118 North Gadsden Street  
Tallahassee, Florida 32301  
jmoyle@moylelaw.com  
kputnal@moylelaw.com  
mqualls@moylelaw.com  
**Attorneys for Florida Industrial Power Users  
Group**

George Cavros  
Southern Alliance for Clean Energy  
120 E. Oakland Park Blvd., Suite 105  
Fort Lauderdale, Florida 33334  
george@cavros-law.com  
**Attorney for Southern Alliance for Clean  
Energy**

Nathan A. Skop, Esq.  
420 NW 50th Blvd.  
Gainesville, FL 32607  
n\_skop@hotmail.com  
**Attorney for Mr. & Mrs. Daniel R. Larson**

Bradley Marshall  
Jordan Luebke  
Earthjustice  
111 S. Martin Luther King Jr. Blvd.  
Tallahassee, Florida 32301  
bmarshall@earthjustice.org  
jluebke@earthjustice.org  
**Attorneys for Florida Rising, Inc.  
League of United Latin American Citizens of  
Florida  
Environmental Confederation of Southwest  
Florida, Inc.**

Katie Chiles Ottenweller  
Southeast Director  
Vote Solar  
838 Barton Woods Road  
Atlanta, GA 30307  
katie@votesolar.org  
**Attorney for Vote Solar**

Robert Scheffel Wright  
John T. LaVia, III  
Gardner, Bist, Bowden, Dee, LaVia, Wright &  
Perry, P.A.  
1300 Thomaswood Drive  
Tallahassee, Florida 32308  
schef@gbwlegal.com  
jlvia@gbwlegal.com  
**Attorneys for Floridians Against Increased  
Rates, Inc.**

William C. Garner  
Law Office of William C. Garner, PLLC  
3425 Bannerman Road  
Unit 105, #414  
Tallahassee, FL 32312  
bgarner@wcglawoffice.com  
**Attorney for The CLEO Institute Inc.**

Stephanie U. Eaton  
SPILMAN THOMAS & BATTLE, PLLC  
110 Oakwood Drive, Suite 500  
Winston-Salem, NC 27103  
seaton@spilmanlaw.com  
**Attorney for Walmart**

Barry A. Naum  
SPILMAN THOMAS & BATTLE, PLLC  
1100 Bent Creek Boulevard, Suite 101  
Mechanicsburg, PA 17050  
bnaum@spilmanlaw.com  
**Attorney for Walmart**

By: /s/ R. Wade Litchfield  
R. Wade Litchfield  
Authorized House Counsel No. 0062190