

**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: September 3, 2021

**FLORIDA POWER & LIGHT COMPANY'S NOTICE OF SERVICE OF OBJECTIONS  
AND RESPONSES TO FLORIDIANS AGAINST INCREASED RATES, INC.'S THIRD  
SET OF INTERROGATORIES (NOS. 40-42) AND THIRD REQUEST  
FOR PRODUCTION OF DOCUMENTS (NOS. 44-45)**

Florida Power & Light Company hereby gives notice of service of its objections and responses to Floridians Against Increased Rates, Inc.'s Third Set of Interrogatories (Nos. 40-42) and Third Request for Production of Documents (Nos. 44-45).

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

Christopher T. Wright  
Senior Attorney  
Authorized House Counsel No. 1007055  
christopher.wright@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 3rd day of September 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**

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  
mqalls@moylelaw.com  
**Attorneys for Florida Industrial Power Users  
Group**

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

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

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**

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

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**

Floyd R. Self, B.C.S.  
Berger Singerman, LLP  
313 North Monroe Street, Suite 301  
Tallahassee, FL 32301  
fself@bergersingerman.com

T. Scott Thompson, Esq.  
Mintz, Levin, Cohn, Ferris, Glovsky and  
Popeo, P.C.  
555 12th Street NW, Suite 1100  
Washington, DC 20004  
SThompson@mintz.com  
**Attorneys for Florida Internet and  
Television Association, 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.**

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

Christina I. Reichert  
Earthjustice  
4500 Biscayne Blvd., Ste. 201  
Miami, FL 33137  
creichert@earthjustice.org  
flcaseupdates@earthjustice.org  
**Attorneys for Florida Rising, Inc.  
League of United Latin American Citizens of  
Florida  
Environmental Confederation of Southwest  
Florida, Inc.**

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  
jlvavia@gbwlegal.com  
**Attorneys for Floridians Against Increased  
Rates, Inc.**

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