

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Complaints by southeastern Utility Services, )  
Inc. on behalf of various customers, against ) Docket No. 030623-EI  
Florida Power & Light Company concerning )  
thermal demand meter error )  
\_\_\_\_\_ )

**OCEAN PROPERTIES, LTD.'S  
FIRST REQUESTS FOR ADMISSIONS TO  
FLORIDA POWER & LIGHT COMPANY (NOS. 1-13)**

Pursuant to Fla.R.Civ.P. 1.370, OCEAN PROPERTIES, LTD. (“Ocean Properties”), by and through its undersigned counsel, hereby serves the following requests for admissions of fact upon Florida Power and Light Company (hereinafter “FPL”) and demands that within thirty (30) days after the service of these requests that FPL specifically admit under oath or deny the following facts. FPL is hereby further advised that a failure to specifically answer any request or an evasive answer to any request will be taken as an admission of truth of such request. FPL is further advised that the answer must specifically deny the matter or set forth in detail the reasons why the answering party cannot truthfully admit nor deny the matter. A denial shall fairly meet the substance of the requested admission and when good faith requires that a party qualify an answer or deny only a part of the matter of which an admission is requested, the party shall specify so much of it as is true and qualify or deny the remainder. An answering party may not give lack of information or knowledge as a reason for a failure to admit or deny unless the party states that the party has made reasonable inquiry and that the information known or readily obtainable by the party is insufficient to enable the party to admit or deny. If FPL is unable to admit or deny the request due to the non-availability of documents, all non-privileged documents which would assist the party in responding to the particular request will be provided for inspection and review at a mutually agreeable date and time at the offices of the undersigned.

The facts which you are requested to admit or deny are as follows:

DOCUMENT NUMBER-DATE  
07225 JUL-13  
FPSC-COMMISSION CLERK

1. Admit that meter number 1V7032D was tested at approximately 80% of full scale on May 21,2003, and that the test indicated a kilowatt demand error of 4.84% for this meter.
2. Admit that meter number 1V5885D was tested at approximately 80% of full scale on May 21,2003, and that the test indicated a kilowatt demand error of 4.84% for this meter.
3. Admit that meter number 1V5025D was tested at approximately 80% of full scale on May 21, 2003, and that the test indicated a kilowatt demand error of 4.12% for this meter.
4. Admit that meter number 1V7001D was tested at approximately 80% of full scale on December 10,2002, and that the test indicated a kilowatt demand error of 4.60% for this ineter.
5. Admit that meter number 1V5192D was tested at approximately 80% of full scale on May 21, 2003, and that the test indicated a kilowatt demand error of 4.36% for this meter.
6. Admit that meter number 1V5159D was tested at approximately 80% of full scale on May 21, 2003, and that the test indicated a kilowatt demand error of 4.36% for this meter.
7. Admit that meter number 1V5887D was tested at approximately 80% of full scale on May 21,2003, and that the test indicated a kilowatt demand error of 4.36% for this meter.
8. Admit that meter number 1V7019D was tested at approximately 78% of full scale on December 10,2002, and that the test indicated a kilowatt demand error of 4.21% for this meter.

9. Admit that meter number 1V5871D has a bent “pusher” pointer and that as a result, as demand rises, the pusher pointer contacts the demand indicating pointer in a different manner than it would if the pusher pointer was straight.
10. Admit that meter number 1V5216D was tested at approximately 80% of full scale on May 21, 2003, and that the test indicated a kilowatt demand error of 4.84% for this meter.
11. Admit that meter number 1V7179D was tested at approximately 80% of full scale on May 21, 2003, and that the test indicated a kilowatt demand error of 4.31% for this meter.
12. Admit that meter number 1V52093 was tested at approximately 60% of full scale on August 21, 2002, and that the test indicated a kilowatt demand error of 6% for this meter.

**CERTIFICATE OF SERVICE**


I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery to those listed below with an asterisk and the remainder by U.S. Mail without an asterisk this day the   1   day of   July  , 2004.

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William H. Hollimon