

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaints by Southeastern)
Utilities Services, Inc. on behalf)
of various customers against) Docket No.: 030623
Florida Power and Light) Filed: July 6, 2004
Company concerning thermal)
demand meter error.)

**OCEAN PROPERTIES, LTD.
NOTICE OF TAKING CONTINUED DEPOSITION DUCES TECUM**

TO: Kenneth A. Hoffman, Esquire
Rutledge, Ecenia, Purnell & Hoffman, P.A.
215 South Monroe Street, Suite 420
Tallahassee, Florida 32301

PLEASE TAKE NOTE, THAT PURSUANT TO Florida Rule of Civil Procedure 1.310,
Ocean Properties, Ltd., will take the following depositions at the times and locations indicated:

**David Bromley
Florida Power & Light Company
9250 West Flagler Street, Room 1606
Miami, Florida 33174
Thursday, August 5, 2004
9:00 a.m.**

The deponents shall bring to this deposition copies of documents as set forth in Exhibit A.
“Documents” means any written, recorded, filmed or graphic matter, whether produced, reproduced,
or on paper, cards, tapes, film, electronic facsimile, electronic mail, computer storage device or any
other media, including, but not limited to, memoranda, notes, minutes, records, photographs,
correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, electronic
mail transmissions, checks, check stubs, reports, studies, charts, graphs, statements, notebooks,
handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment calendars,
records or recordings or oral conversations, work papers, and also including, but not limited to
originals, whether by interlineation, receipt stamp, notation, indication of copies sent or received or
otherwise, and drafts, which are in the possession, custody or control of FPL or in the possession

DOCUMENT NUMBER 07358 JUL-6 04
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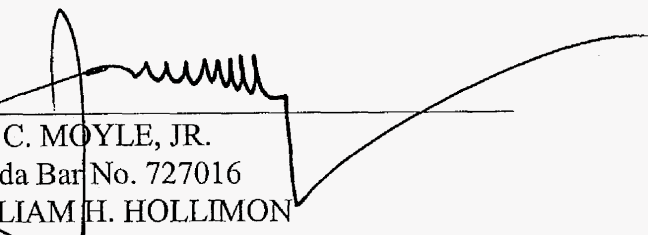
custody or control of the present or former agents, representatives or attorneys of FPL, or any and all persons acting on its behalf, including documents at any time in the possession, custody or control of such individuals or entities or known by FPL to exist.

“You”, “your”, “Company” or “FPL” refers to Florida Power and Light Company, its employees and authorized agents.

The foregoing will take place before a court reporter, notary public, or before some other officer authorized by law to take depositions. Said deposition is to be used for discovery purposes, for use at trial, or both, and will continue from day-to-day until complete.

Individuals with disabilities needing a reasonable accommodation to participate in this proceeding should contact Jon C. Moyle, Jr., Esquire at 850/681-3828. If hearing impaired, call 1/800-955-8771 (TDD) or 1/800/955-8770 (V) via Florida Relay Service for assistance.

PLEASE GOVERN YOURSELVES ACCORDINGLY.



JON C. MOYLE, JR.
Florida Bar No. 727016
WILLIAM H. HOLLIMON
Florida Bar No. 104868
MOYLE, FLANIGAN, KATZ, RAYMOND
& SHEEHAN, P.A.
The Perkins House
118 North Gadsden Street
Tallahassee, Florida 32301
(850) 681-3828 (telephone)
(850) 681-8788 (facsimile)
jmoylejr@moylelaw.com
bhollimon@moylelaw.com

Attorneys for Ocean Properties, Ltd..

cc: Worldwide Reporting

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 6th day of July, 2004.

Cochran Keating, Esquire
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Bill Walker
Florida Power & Light Company
215 South Monroe Street, Suite 810
Tallahassee, FL 32301

*Kenneth A. Hoffman
Rutledge, Ecenia, Purnell & Hoffman
Post Office Box 551
Tallahassee, FL 32302-0551

R. Wade Litchfield
Law Department
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420

Daniel Joy
785 SunTrust Bank Plaza
1800 Second Street
Sarasota, FL 34236

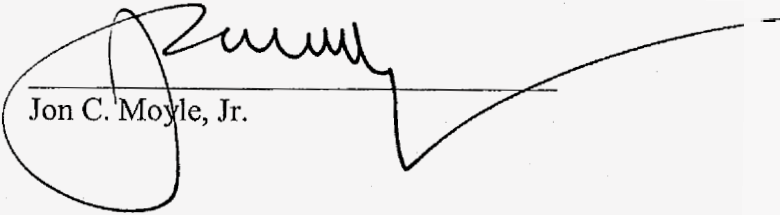

Jon C. Moyle, Jr.

Exhibit A

All documents you relied upon when calibrating 1-V thermal demand meters.

All documents relating to 1-V thermal demand meters provided to you by Landis and Gyr.

All documents relating to the accuracy of thermal demand meters including 1-V meters that are being reviewed by the Florida Public Service Commission.

All correspondence you have received, including e-mails, relating 1-V thermal demand meters.

All documents you have sent, including e-mails, relating to thermal demand meters.

All documents regarding how 1-V thermal demand meters are to be maintained.

All documents regarding how 1-V thermal demand meters are to be tested for accuracy.

All documents regarding the percent of scale that 1-V thermal demand are tested to determine accuracy.

All documents regarding temperature affects upon thermal demand meters.

All documents which discuss or are otherwise related problems or concerns involving 1-V thermal demand meters.

All documents you have regarding the accuracy of 1-V thermal demand meters.