# RIGINAL RUTLEDGE, ECENIA, PURNELL & HOFFMAN

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> > July 28, 2004

**B. DAVID PRESCOTT** HAROLD F. X. PURNELL MARSHA E. RULE GARY R. RUTLEDGE MAGGIE M. SCHULTZ GOVERNMENTAL CONSULTANTS MARGARET A. MENDUNI

M. LANE STEPHENS

28 PM 4:

### VIA HAND DELIVERY

Ms. Blanca S. Bayó, Director Division of the Commission Clerk and Administrative Services Florida Public Service Commission Betty Easley Conference Center 2540 Shumard Oak Boulevard, Room 110 Tallahassee, FL 32399-0850

> Docket No. 030623-EI Re:

Dear Ms. Bayó:

Enclosed for filing in the above-referenced docket on behalf of Florida Power & Light Company ("FPL") are the original and one (1) copy of FPL's Notice of Service of Second Set of Interrogatories (Nos. 18-38), Second Request for Production of Documents (Nos. 13-28), and Second Request for Admissions (Nos. 9-44) to Ocean Properties, Ltd., J.C. Penney Corp., Dillard's Department Stores, Inc., and Target Stores, Inc.

Please acknowledge receipt of this document by stamping the extra copy of this letter "filed" and returning the copy to me in the enclosed self-addressed stamped envelope. Please contact me CMP if you have questions regarding this filing.

COM		
CTR	Sincerely,	
ECR	Land Holfen	
GCL	Kenneth A. Hoffman	
OPC	Keinieur A. Horman	
MMS		
RCAK_AH/rl		
SCR Enclosures		
SEC RECEIVED & FILED		DOCUMENT NUMBER-DATE
		08216 JUL 28 3
FPSC-BUREAU OF RECOF	RDS	FPSC-COMMISSION CLERK

#### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

Complaints by Southeastern Utility Services,) Inc. on behalf of various customers, against ) Florida Power & Light Company concerning) thermal demand meter error )

Docket No. 030623-EI

Filed: July 28, 2004

## FLORIDA POWER & LIGHT COMPANY'S NOTICE OF SERVICE OF SECOND SET OF INTERROGATORIES (NOS. 18-38), SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 13-28), AND SECOND REQUEST FOR ADMISSIONS (NOS. 9-44) TO OCEAN PROPERTIES, LTD., J.C. PENNEY CORP., DILLARD'S DEPARTMENT STORES, INC., AND TARGET STORES, INC

Florida Power & Light Company ("FPL") by and through its undersigned counsel, hereby files and serves Notice that it has served its Second Set of Interrogatories (Nos. 18-38), Second Request for Production of Documents (Nos. 13-28), and Second Request for Admissions (Nos. 9-44) to Ocean Properties, Ltd., J.C. Penney Corp., Dillard's Department Stores, Inc. and Target Stores, Inc. by hand delivery and mailed electronically on Jon C. Moyle, Esq., 118 N. Gadsden Street, Tallahassee, Florida 32301, this 28<sup>th</sup> day of July, 2004, and that a copy of this Notice and the foregoing discovery requests have been served on all parties of record in the manner set forth in the attached Certificate of Service.

Respectfully submitted,

Natalie F. Smith Esq.

Florida Power & Light Company Law Department 700 Universe Boulevard Juno Beach, FL 33408 Telephone: (561) 691-7207 Facsimile: (561) 691-7135

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DOCUMENT NUMBER-DATE 08216 JUL 28 3 FPSC-COMMISSION CLERK Kenneth A. Hoffman, Esq. J. Stephen Menton, Esq. Rutledge, Ecenia, Purnell & Hoffman, P.A. P. O. Box 551 Tallahassee, Florida 32302 (850) 681-6788 (Telephone) (85) 681-6515 (Telecopier)

Attorneys for Florida Power & Light Company

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been hand-delivered (\*) and mailed electronically this 28th day of July, 2004, to the following:

Cochran Keating, Esq. Senior Attorney Florida Public Service Commission Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 Jon C. Moyle, Jr., Esq.\* William Hollimon, Esq. Moyle Flanigan Katz Raymond & Sheehan, P.A. The Perkins House 118 North Gadsden Street Tallahassee, FL 32301

By: Kenneth A. Hoffman, Esq.