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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of optional nonstandard meter rider, by Florida Power &

DOCKET NO. 130223-EI

FILED: September 8, 2014

NOTICE OF FILING

Intervenors Shari R. Anker, Alexandra Ansell, Stephanie & Peter J. Austin, Martha Babson, William G. & Margo A. Bigelow, Kathleen Bolam, Patricia DeNunzio, Jeri E. Friedman, George Fuller, Cathy & Mario Grippi, Shirley D. Jackson, Jamie & Douglas Lehman, Marilynne Martin, Victor J. Rohe, Sandra L. Smart, and David E. Watkins ("Intervenors Martin et. al."), by and through the undersigned attorney, gives notice of filing of the following:

STIPULATION AND AGREEMENT TO EXTEND TIME FOR DISCOVERY BETWEEN INTERVENORS MARTIN ET. AL. AND FLORIDA POWER & LIGHT.

in the above-styled matter, for the record in these proceeding.

Respectfully submitted, September 8, 2014.

/s/ Ennis Leon Jacobs, Jr. Ennis Leon Jacobs, Jr. Florida Bar Number: 0714682 P.O. Box 1101 Tallahassee, FL 32302 Telephone: (850) 222-1246

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CERTIFICATE OF SERVICE

I CERTIFY that a copy hereof has been furnished by email this 8^{th} day of September, 2014, to:

Suzanne Brownless, Esq.
Division of Legal Services
Florida Public Service Commission
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Tallahassee, FL 32399-0850
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/s/ Ennis Leon Jacobs, Jr. Ennis Leon Jacobs, Jr.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for approval of optional non-)	DOCKET NO. 130223-EI
standard meter rider, by Florida Power & Light Company.)))	FILED: September 8, 2014

STIPULATION AND AGREEMENT TO EXTEND TIME FOR DISCOVERY BETWEEN INTERVENORS MARTIN ET. AL. AND FLORIDA POWER & LIGHT COMPANY

WHEREAS, Pursuant to Chapter 120, Florida Statutes (F.S.), and the relevant provisions of Chapter 366, F.S., Rules 25-22, 25-40, and 28-106, Florida Administrative Code, and the Florida Rules of Civil Procedure (as applicable), and Order No. 14-01004-PCO-EI, Intervenors Shari R. Anker, Alexandra Ansell, Stephanie & Peter J. Austin, Martha Babson, William G. & Margo A. Bigelow, Kathleen Bolam, Patricia DeNunzio, Jeri E. Friedman, George Fuller, Cathy & Mario Grippi, Shirley D. Jackson, Jamie & Douglas Lehman, Marilynne Martin, Victor J. Rohe, Sandra L. Smart, and David E. Watkins, by and through Ennis Leon Jacobs, Jr., ("Intervenors Martin et. al.") have propounded their Second Set of Interrogatories (Nos. 52-60), and their First Request for Production of Documents (Nos. 1-11) to Florida Power & Light Company ("FPL", "Company" or "Utility) to be answered on or before *fourteen (14) days* from the date of service; and

WHEREAS, Order No. 14-01004-PCO-EI, as amended by Order No. 14-0270-PCO-EI, specifies that all discovery in this matter be completed by September 4, 2014.

NOW THEREFORE, in consideration of the foregoing and the covenants contained herein, the Parties hereby agree and stipulate as follows:

- 1. Subject to consent by the Prehearing Officer in this matter, the period for completion of the above-referenced discovery requests from Intervenors Martin et. al. to Florida Power & Light shall be extended until fourteen days from September 3, 2014, or on September 17, 2014.
- 2. FPL's agreement does not constitute a waiver of its right to assert any legal objections as necessary; FPL additionally preserves its right to object to any discovery request that is unduly burdensome particularly in light of the work required prior to the looming evidentiary hearing date, or seeks information that lies beyond scope of this proceeding. FPL's agreement has no precedential value in this docket or any other docket.

In Witness Whereof, the Parties evidence their acceptance and agreement with the provisions of this Stipulation Agreement by their signatures below:

[Remainder of page intentionally left blank]

Ennis Leon Jacobs, Jr. Williams & Jacobs P.O. Box 1101 Tallahassee, Florida 32302 (850) 222-1246 Fla. Bar ID. 0714682

Kenneth M. Rubin, Esq. Maria Moncada, Esq.
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