

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaints by)
Southeastern Utility Services,) Docket No.: 030623-EI
Inc., on behalf of various)
Customers, against Florida Power) Date: April 8, 2004
& Light Company concerning)
thermal demand meters.)
_____)

**REQUEST OF SOUTHEASTERN UTILITY SERVICES, INC. AND
AND OCEAN PROPERTIES, LTD., TO FLORIDA POWER & LIGHT
COMPANY FOR ENTRY UPON LAND FOR INSPECTION AND
OTHER PURPOSES AND PRODUCTION OF DOCUMENTS**

Southeastern Utility Services, Inc. and Ocean Properties, Ltd. (hereinafter "Select Petitioners"), by and through its undersigned counsel, file this Request for Entry Upon Land for Inspection and Other Purposes pursuant to Rule 1.350, Florida Rules of Civil Procedure, and Rule 28-106.206, Florida Administrative Code, and request that **FLORIDA POWER & LIGHT COMPANY** (hereinafter "FPL"), permit entry to its property located at 6001 NW 70th Avenue, Miami, FL 33166 for the purpose of inspecting, testing and photographing FPL's meter testing board that was used for testing thermal demand meters. The testing and inspection that Petitioners seek to perform is set forth with reasonable particularity as set forth below in paragraphs 1 to 12. Select Petitioners seek access to the property and for the purposes described herein at 9:30 a.m. on May 11, 2004. Petitioners also seek the production of certain documents as set forth herein. The term "thermal demand meter test boards" means the testing boards FPL has in place that have been used or are being used used to test thermal demand meters, and includes the eastern specialty thermal demand testing gang boards.

1. Petitioners seek to inspect and test the standards reference meter or meters FPL has in place at its thermal demand meter test boards.

2. Petitioners seek to test a proofed transfer electronic standard meter referenced to the Kentucky Public Service Commission standards that they have in their possession against the standards reference meter or meters that FPL has in place at its thermal demand meter test boards.

3. Petitioners seek to inspect and test the electronic transfer standard FPL used as a reference for independent testing of certain meters in Bradenton, Florida on or about March 29, 2004 and March 30, 2004 against the standards reference meter or meters FPL uses at its thermal demand test boards.

4. Petitioners seek to test and inspect any standard meters used by FPL at its thermal demand test boards while testing the thermal demand meters that are the subject of this docket.

5. Petitioners seek to photograph all standard meters used by FPL to test or otherwise evaluate the thermal demand meters that are the subject of this docket.

6. Petitioners seek all documents related to the accuracy of FPL's thermal demand test boards.

7. Petitioners seek to inspect and photograph or copy any written directions, instructions, guidelines or other documents relied upon by FPL's meter testers when testing or calibrating thermal demand meters that are the subject of this docket.

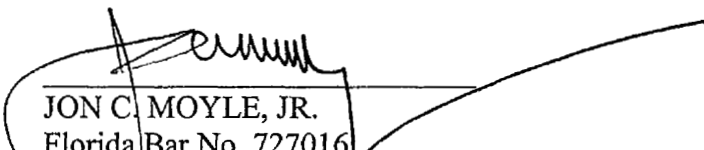
8. Petitioners seek to inspect, test, and photograph all tools used by FPL meter testers in the last five years when testing or calibrating thermal demand meters that are the subject of this docket.

9. Petitioners seek to measure the voltage and amperage applied to meters being tested on FPL's thermal demand meter test boards.

10. Petitioners seek to measure the voltage and amperage applied to FPL standard demand meters used in testing on FPL's thermal demand meter test boards.

11. Petitioners seek to inspect, photograph or copy all records reflecting the maintenance of FPL's standards reference meter or meters for the last five years.

12. Petitioners seek to all documents related to the maintenance, repair, or upkeep of FPL's thermal demand test boards.



JON C. MOYLE, JR.
Florida Bar No. 727016
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)

CERTIFICATE OF SERVICE


I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail on this 8th day of April, 2004, to those listed below without an asterisk, and by hand delivery to those marked with an asterisk:

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

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

Mr. William G. Walker, III
Vice President
Florida Power & Light Company
215 South Monroe Street, Suite 810
Tallahassee, Florida 32301-1859

R. Wade Litchfield, Esquire
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, Florida 22408-0420

By: 
Jon C. Moyle, Jr.