

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 SET OF INTERROGATORIES
TO FLORIDA POWER & LIGHT COMPANY (NOS. 1-10)**

Pursuant to Rule 1.340, Florida Rules of Civil Procedure, OCEAN PROPERTIES, LTD. (hereinafter "OCEAN PROPERTIES"), by and through its undersigned attorney, hereby serves its First Set of Interrogatories (Nos. 1 through 10) to Florida Power & Light Company (hereinafter "FPL"). These interrogatories shall be answered under oath by you or through your agent who is qualified to answer and who shall be fully identified, with said answers being served as provided pursuant to the Rules of Civil Procedure, within twenty (20) days.

DEFINITIONS

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

"Document" or "report" shall mean any kind of written, typed, recorded, or graphic matter, however produced or reproduced, of any kind or description, whether sent or received, including originals, non-identical copies and drafts and both sides thereof; and including, but not limited to: papers, books, letters, correspondence, telegrams, bulletins, notices, announcements, instructions, charts, manuals, brochures, schedules, cables, telex messages, memoranda, notes, notations, accountants' working papers, transcripts, notes, computer models, minutes, agendas, reports and recordings of telephone or other conversations, of interviews, of conferences, or of other meetings, affidavits, statements, summaries, opinions, reports, studies, analyses, evaluations, contracts, agreements, journals, statistical records, desk calendars, appointment

DOCUMENT NUMBER-DATE

07226 JUL-13

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books, diaries, lists, tabulations, sound recordings, computer print-outs, data processing input and output, microfilms, and all other records kept by electronic, photographic, or mechanical means and things similar to any of the foregoing, however denominated by you, and any other documents as defined in Rule 1.340, Florida Rules of Procedure;

“Identify” shall mean:

(a) With respect to a person, to state the person’s name, address, and business relationship (e.g., “employee”) to the Company;

(b) With respect to any document or report, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

(c) in the event any interrogatory herein calls for information or for the identification of a document which you deem to be privileged, in whole or in part, the information should be given or the document identified to the fullest extent possible consistent with such claim of privilege and specify the grounds relied upon for the claim of privilege; and

(d) for each interrogatory, identify the name, address, telephone number and position of the person responsible for providing the answer.

INTERROGATORIES

1. Identify and describe what you contend caused the thermal demand meter (Serial No. 29877683, Type TMT, Form 6S) to respond as shown on the Meter Test Summary for test date June 12,2002 (reference document bates no. 000150 TMT).

2. What do you contend are the reasons (root mean cause) why demand testing of the sample of 50 Form 6S, 277V, thermal demand meters (1V) tested between June 25,2002 and July 9,2002, revealed that 12.2% of these meters were defective?

3. Identify all processes, physical phenomena, human interventions, or any other mechanism whereby the demand accuracy of 1V thermal demand meters (Type TMT, Form 6S), either gradually, spontaneously, or instantaneously, is affected.

4. Identify all components of 1V thermal demand meters (Type TMT, Form 6S) that are subject to gradual failure, and for each such component identify the effect such failure has on the meter's demand accuracy.

5. Identify all components of 1V thermal demand meters (Type TMT, Form 6S) that are subject to sudden failure, and for each such component identify the effect such failure has on the meter's demand accuracy.
6. Identify each step in FPL's calibration procedure for 1V thermal demand meters (Type TMT, Form 6S) that deviates from the manufacturer's recommended calibration procedure (reference documents with Bates No.'s 000026 TDM - 000030 TDM).
7. For each step in FPL's calibration procedure identified in response to Interrogatory No. 6, state the basis for the deviation from the manufacturer's recommendation.
8. Identify any process, physical phenomena, component failure, or any other mechanism whereby you contend that 1V thermal demand meters (Type TMT, Form 6S) gradually over-register demand.

9. Identify any process, physical phenomena, component failure, or any other mechanism whereby you contend that 1V thermal demand meters (Type TMT, Form 6S) gradually under-register demand.

✎

10. State the basis for the conclusion (reference Bates No. 000305 TDM) that testing a thermal demand meter at the customer's average load will result in fewer meters failing the test than if the test is conducted at 80% of full scale.

CERTIFICATE OF SERVICE

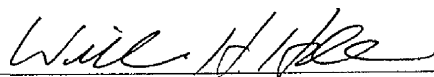
I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery to those listed below with an asterisk and the remainder by U.S. Mail without an asterisk this day the 1 day of July, 2004.

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