

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

OCEAN PROPERTIES, LTD.
NOTICE OF TAKING CORPORATE DEPOSITIONS DUCES TECUM

TO: Siemens Power Transmission and Distribution, Inc.
c/o CT Corporation
1200 South Pine Island Road
Plantation FL 33324

PLEASE TAKE NOTICE THAT PURSUANT TO Florida Rule of Civil Procedure 1.410 and 1.310(b)(6), Ocean Properties, Ltd., on Monday, September 13, 2004, beginning at 9:00 a.m. at the offices of Moyle, Flanigan, Katz, Raymond & Sheehan, P.A., 118 N. Gadsden Street, Tallahassee, Florida 32301, will take the deposition of

- 1) The person at Siemens most knowledgeable about thermal demand meters, including TMS/TMT Thermal Demand Meters.

The deponent(s) 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, 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.

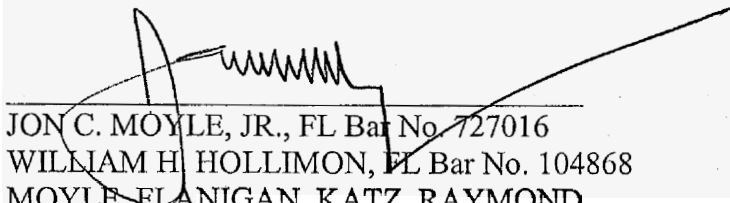
“You”, “your”, “Company” or “Siemens” refers to Siemens Power Transmission & Distribution, Inc., and a company you acquired, Landis & Gyr, and their employees and authorized agents.

“FPL” refers to Florida Power & Light Company.

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., FL Bar No. 727016
WILLIAM H. HOLLIMON, FL Bar No. 104868
MOYLE, FLANIGAN, KATZ, RAYMOND
& SHEEHAN, P.A.

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Attorneys for Ocean Properties, Ltd.

cc: Worldwide Reporting

Exhibit A

1. All updates or technical advisories provided to FPL for thermal demand meters.
2. All correspondence, including e-mails, exchanged between you and FPL regarding thermal demand meters.
3. All documents related to impacts the sun or heat may have on thermal demand meters.
4. All documents related to the calibration of thermal demand meters.
5. All documents related to causes or reasons why the demand component of thermal demand meters may gradually overregister demand.
6. All notes or other documents regarding meetings, discussions, or other communication between you and FPL regarding thermal demand meters.
7. All documents related to any legal or administrative complaints in your possession related to the accuracy of thermal demand meters.
8. All documents related to how customer refunds should be calculated for thermal demand meters..
9. All documents indicating at what point on the thermal demand scale and/or at what percentage thermal demand meters should be tested for accuracy.
10. All documents related to the maintenance of thermal demand meters.
11. All documents related to the accuracy or performance of Landis & Gyr thermal demand meters.
12. All documents related to how a thermal demand meter should be tested for accuracy related to its demand component.
13. All documents regarding the point or points on a thermal demand meter scale the meter should be calibrated so the meter is most accurate.

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 August, 2004.

Cochran Keating, Esquire
Florida Public Service Commission
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Tallahassee, FL 32399-0850

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Florida Power & Light Company
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Jon C. Moyle, Jr.