

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) August 23, 2004
_____)

**OCEAN PROPERTIES, LTD.'S
SECOND SET OF INTERROGATORIES
TO FLORIDA POWER & LIGHT COMPANY (NOS. 11-19)**

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 Second Set of Interrogatories (Nos. 11 through 17) 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

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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.

have failed, degraded, or had physical characteristics or properties changed in any manner.

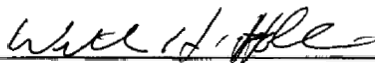
16. Referring to the rebuttal testimony of Edward C. Malemezian, page 12, line 9 - page 13, line 5, for all meters in this docket, identify all actions taken by FPL to determine if any of the components, conditions, or characteristics identified have changed or degraded in a manner that would result in over-registration of demand (kW) or consumption (kWh).

17. For the meters in this docket, identify any change in the “spring constant” referred to in the rebuttal testimony of Edward C. Malemezian, page 13, line 22, that FPL has observed and/or measured.

18. On pages 13 - 17 of the rebuttal testimony of Edward C. Malemezian, Mr. Malemezian identifies several components of thermal demand meters that are subject to “changes” that could affect the demand registration of these meters. For each such component

identify each such change that FPL has observed and/or measured for the meters in this docket.

19. For the meters in this docket, identify the range and frequency of the “regular and continued temperature cycling” referred to in the rebuttal testimony of Edward C. Malemezian, page 13, lines 12 - 18, that FPL has observed and measured, and identify the specific “characteristics of materials” that are changed by such “temperature cycling” and identify each such change that FPL has observed and measured.



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