BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaints by Southeastern Utilities	osa) cita cara	
Services, Inc., on behalf of various customer	f§)	Docket no.: 030623
against Florida Power and Light Company)	
concerning thermal demand meter error.)	Filed: August 26, 2004

MOTION TO COMPEL

Ocean Properties, Target, JC Penney, and Dillards ("Customers") hereby file this motion to compel. As grounds for their motion, Customers state:

- On April 8, 2004, Ocean Properties filed its Request to FPL for Entry Upon Land for 1. Inspection and Other Purposes ("Request to Inspect") A copy is attached as Exhibit A..
- 2. On May 10, 2004, FPL filed its Response, objecting to Customers' Request to Inspect. A copy is attached as Exhibit B.
- 3. Customers seek to inspect FPL's meter test board and standard meters, to independently verify the accuracy of this equipment.
 - FPL's stated objections to Customers' Request to Inspect are: 4.
 - Chapter 366, Florida Statutes and Rule 25-6.059, F.A.C., completely define a. Customers' rights regarding meter testing:
 - Customers' Request to Inspect exceeds Customers' "rights as [] customer[s]" b. to request tests of FPL's meters and related equipment, and Customers "should not be permitted to utilize the discovery process to rewrite the inspection and testing provisions as established by Commission rules; and
 - Rule 1.350(a)(3), Florida Rules of Civil Procedure, the rule upon which c.

Customers' Request to Inspect is based, "is not applicable to this proceeding because the Commission has promulgated its own rules pertaining to all aspects of customer-requested meter testing."

5. None of FPL's objection are well founded. The Commission has not taken any exceptions to the Uniform Rules of Procedure pertaining to discovery. Rule 28-106.206 states

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After commencement of a proceeding, parties may obtain discovery through the means and in the manner provided in Rules 1.280 through 1.400, Florida Rules of Civil Procedure. The presiding officer may issue appropriate orders to effectuate the purpose of discovery and to prevent delay, including the imposition of sanctions in accordance with the Florida Rules of Civil Procedure, except contempt.

- 6. Therefore, Rule 1.350(a)(3), Florida Rules of Civil Procedure, is applicable to this proceeding, and discovery requested pursuant to this rule is proper. Moreover, the Commission has not adopted a scheme of regulation that addresses discovery in contested proceedings. The requested inspections are outside of Commission rules that do deal with meter testing as Customers seek to test FPL equipment that is different from Customers' meters. Customers seek to inspect and test the FPL equipment that FPL itself has used to test Customers' meters.
- 7. A critical issue in this docket is the length of refund to which Customers are entitled. Customers contend that refunds longer than 12 months are appropriate, while FPL contends that refunds of only 12 months are appropriate. FPL further contends that Customers have the burden of proving entitlement to refunds longer than 12 months. Customers' position is that their meters have been over-registering demand since their meters were initially installed.
- 8. FPL has produced test results for the meters in this docket. These test results are for tests conducted prior to meter installation, and following meter removal. FPL relies on these test results to rebut Customers' contention that refunds longer than 12 months are required (see rebuttal

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testimony of David Bromley). A copy of the test results for one meter in this docket is attached as Exhibit C.

9. As indicated in Exhibit C, this meter (Target - Ft. Meyers) was tested on January 8, 1993, on "Demand Board # 02." (4550 TDM). This meter was retested on December 10, 2002, on "Board 4." (4549 TDM). A similar pattern exists for other meters in this docket - i.e., the meter test prior to installation was conducted on a different demand board than the test conducted upon meter removal. Customers seek access to these demand boards to determine if there is a difference between these boards that explains the demand over-registration observed in the most recent testing (Customers observe that the earlier tests were conducted on demand boards 1 and 2, and the later tests were conducted on demand boards 3 and 4). Customers suspect that variances between these boards may account for both the differences in tested demand registration and the actual observed changes (based on historical billing information) that Customers have observed following meter replacement. This information is critical to Customers' ability to demonstrate their entitlement to refunds longer than 12 months.

WHEREFORE, Customers respectfully request the Commission grant this motion and compel FPL to provide Customers with the requested access to perform the testing specified in their Request to Inspect.

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JON C. MOYLE, JR.
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WILLIAM H. HOLLIMON
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Attorneys for Customers

CERTIFICATE OF SERVICE

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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 26th day of August, 2004.

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

Bill Walker Florida Power & Light Company 215 South Monroe Street, Suite 810 Tallahassee, FL 32301

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R. Wade Litchfield
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Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420

Daniel Joy 785 SunTrust Bank Plaza 1800 Second Street Sarasota, FL 34236

William H. Hollimor

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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FPSC-COMMISSION OF FOU

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.	
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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.

EXHIBIT

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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.

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

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CERTIFICATE OF SERVICE

Agreement of

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
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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.

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LEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION ATTORNEYS AND COUNSELORS AT LAW

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POST OFFICE BOX 551, 32302-0551 215 SOUTH MONROE STREET, SUITE 420

> TELEPHONE (850) 681-6788 TELECOPIER (850) 681-6515

August 18, 2004

HAROLD F. X. PURNELL MARSHA E. RULE GARY R. RUTLEDGE

MARGARET A. MENDUNI

Ms. Blanca S. Bayo, Director Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, Florida 32399-0850

Docket No. 030623-EI

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket on behalf of Florida Power & Light Company ("FPL") are an original and fifteen copies of FPL's Motion to Compel Answers to Florida Power & Light Company's First Set of Interrogatories Nos. 10, 11 and 12.

Please acknowledge receipt of these documents by stamping the extra copy of this letter filed and returning the copy to me.

Thank you for your assistance with this filing.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Complaints by Southeastern Utility Ser	vices,)
Inc. on behalf of various customers, ag	ainst)
Florida Power & Light Company conce	rning)
thermal demand meter error)

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Docket No. 030623-EI

Filed: May 10, 2004

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

Florida Power & Light Company ("FPL"), by and through its undersigned counsel, and pursuant to Rule 1.350(b), Florida Rules of Civil Procedure, and Rule 28-106.206, Florida Administrative Code, hereby files this Response and Objection to Southeastern Utility Services, Inc.'s ("SUSI") and Ocean Properties, LTD.'s ("Ocean Properties") Request to FPL for Entry Upon Land for Inspection and Other Purposes and Production of Documents ("Request for Inspection"). Rule 1.350(b), Florida Rules of Civil Procedure, states that the party to whom a request for inspection is directed shall serve a written response within 30 days after service of the request, and that for each item or category the response shall state that inspection and related activities will be permitted as requested, unless the request is objected to, in which event the reasons for the objection shall be stated. FPL objects to the Request for Inspection in its entirety, and in support thereof states as follows:

I. SUSI Lacks Standing to Participate in this Proceeding

1. At the outset, FPL objects to any discovery propounded by SUSI on the ground that SUSI lacks standing to participate as a party to this proceeding. By its terms, Rule 1.350(a)(3), Florida Rules of Civil Procedure, is available to "[a]ny party." Accordingly, unless and until it is determined that SUSI is a proper party to this proceeding, FPL incorporates by reference its Motion

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FPSC-COMMISSION CLERK

to Dismiss SUSI as a Petitioner in this proceeding filed on January 5, 2004, and its Objections to SUSI's First Request for Production of Documents filed on February 9, 2004, in support of this objection.

II. The Request goes Beyond the Scope of the Applicable Meter Testing Rules

- 2. With the exception of the document requests contained in Items 6-7 and 11-12 discussed below, the Request for Inspection seeks entry to FPL's property for the purpose of inspecting, testing, photographing and measuring FPL's meter testing board that is used for testing thermal demand meters. FPL objects to every aspect of the Request for Inspection to the extent that it seeks permission for entry to FPL's property located at 6001 NW 70th Avenue, Miami, FL 33166, for the purpose of inspecting, testing, photographing, or measuring FPL's meter testing board, or any piece of property or equipment related thereto, on the ground that the Request for Inspection goes beyond the scope of the requirements of the Florida Administrative Code Rules applicable to FPL and this proceeding.
- 3. By its own admission, Ocean Properties is a commercial retail electric service customer of FPL. As a customer of FPL, Ocean Properties has been given a limited statutory right through provisions of Chapter 366, Florida Statutes to request that FPL conduct certain tests to its electric meter. In addition, Rule 25-6.059, Florida Administrative Code, provides guidelines and procedures for the utility and the customer to follow in the event that a request is made by a customer to a utility that its meter be tested.

See paragraph 6 of Petition for Formal Administrative Hearing Pursuant to Sections 120.569 and 120.57(1), Florida Statutes, filed on December 10, 2003 in this proceeding, by Petitioners, Ocean Properties, Ltd., J.C. Penney Corporation, Dillards Department Stores, Inc., Target Stores, Inc., and Southeastern Utilities Services, Inc.

- 4. FPL objects to Ocean Properties' Request for Inspection to the extent that it exceeds the established parameters for meter testing set forth in Commission Rule 25-6.059, Florida Administrative Code. Ocean Properties' rights as a customer to request tests of FPL's meters and related equipment are established by Commission rule. Ocean Properties should not be permitted to utilize the discovery process to rewrite the inspection and testing provisions as established by Commission rules.
- Rule 1.350(a)(3), Florida Rules Of Civil Procedure, which is the procedural rule under which Ocean Properties' Request for Inspection was filed, is not applicable to this proceeding because the Commission has promulgated its own rules pertaining to all aspects of customer-requested meter testing. The Florida Rules of Civil Procedure are made applicable to this proceeding by Rule 28-106.206, Florida Administrative Code. Rule 28-106.101, Florida Administrative Code, provides that Chapter 28-106, Florida Administrative Code, shall apply in all proceedings such as this one, in which the substantial interests of a party are determined by the agency, and shall be construed to secure the just, speedy, and inexpensive determination of every proceeding under Chapter 120 except where the agency has adopted rules covering the subject matter pursuant to Section 120.54(5)(a)2, Florida Statutes. (Emphasis supplied).
- 6. Because the Commission has exercised its authority and has adopted extensive rules that govern the testing of electric meters, Rule 1.350, Rules of Civil Procedure is not applicable in this proceeding and can not be used to create new meter testing requirements.

III. The Request goes Outside of the Scope of this Proceeding

7. FPL objects to the Request for Inspection because it seeks to conduct testing that is outside the scope of this proceeding. In its Petition for Formal Administrative Hearing, Ocean

Properties, along with the other petitioners, state that the "dispute in this proceeding centers on the amount of refund FPL owes Customers for the overcharges due to the faulty meters." ² Furthermore, in the protested PAA Order issued by the Commission in this docket, the Commission stated that the purpose of this docket was to "address issues regarding the remaining dispute, which is the appropriate method to determine refunds for the those customers who used Type 1V thermal demand meters that over-registered demand." ³

8. Although there has yet to be a procedural schedule or a list of issues established for this docket, from Ocean Properties' petition, it is clear that the main issue in dispute in this docket is the methodology and amount of refunds, if any, owed to the individual petitioners who are customers of FPL. FPL objects to any attempt to expand the scope of this proceeding and to impose upon FPL obligations to perform testing that is beyond the scope of the Commission's rules and that is not relevant to the methodology to determine refunds, if any, that are owed to customers.

IV. The Request for Inspection Seeks the Production of Documents Already Provided to Ocean Properties in this Proceeding, or that are Subject to Specific Objections

- 9. On January 9, 2004, SUSI and Ocean Properties served its First Request for Production of Documents on FPL ("First Document Request"). FPL filed its Responses and Objections to SUSI's and Ocean Properties' Request on February 9, 2004.
 - 10. FPL objects to the Request for Inspection on the grounds that the document requests contained therein are duplicative of the document requests contained in SUSI and Ocean Properties' First Document Request, and because FPL has either produced the documents in response to the First

See, paragraph 13 of Petition.

Document Request, or the requests are subject to pending specific objections.

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- A. Item No. 7 of the Request for Inspection Seeks the Production of Documents Already Provided to Ocean Properties
- 11. FPL objects to Item No. 7 of the Request for Inspection which seeks to inspect and photograph 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.
- 12. Request No. 2 of SUSI and Ocean Properties' First Document Request sought "[a]ll documents you rely upon when providing instructions as to how to calibrate thermal demand meters." Request No. 3 of the First Document Request sought "[a]ll documents you provide or provided to those responsible for calibrating thermal demand meters which set forth instructions, guidelines or other directions as to how thermal demand meters should be calibrated."
- 13. Subject to general objections contained in FPL's Response, all documents responsive to these requests have been provided to Ocean Properties. FPL objects to Item No. 7 of the Request for Inspection on the grounds that it is a duplication of previous discovery requests, and because the documents in response to Item No. 7 of the Request for Inspection have been provided to Ocean Properties.
 - B. Items Nos. 6, 11, and 12 of the Request for Inspection Seek the Production of Documents that are the Subject of Pending Objections by FPL
- 14. Item Nos. 6, 11, and 12 of the Request for Inspection also seek the production of documents that were previously requested by Ocean Properties in its First Request for Production of Documents filed January 9, 2004. FPL raised specific objections to those requests in addition to raising numerous general objections, all of which remain pending.
 - 15. Item Number 6 of the Request for Inspection seeks all documents related to the

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accuracy of FPL's thermal demand test boards. Item Nos. 11 and 12 of the Request for Inspection seek to inspect all records reflecting the maintenance of FPL's standards reference meter or meters for the last five years, and all documents related to the maintenance, repair, or upkeep of FPL's thermal demand test boards.

- 16. Request No. 5 of the First Document Request sought "[a]ll documents which refer or relate to the accuracy of thermal demand meters." Request Nos. 8 through 23 sought documents from FPL which covered a wide range of aspects relating to the thermal demand meters, including the results of tests of the thermal demand meters conducted by FPL, as well as all documents and correspondence related to the accuracy of the thermal demand meters.
- 17. In its Response to the First Document Request, FPL raised specific objections to these document requests, in addition to raising numerous general objections. To date, FPL's specific objections to the discovery requests remain pending. With respect to Item Nos. 6, 11, and 12 of the Request for Inspection, FPL hereby adopts and incorporates the objections previously raised.

WHEREFORE, for the above-stated reasons, FPL objects to Southeastern Utility Services, Inc.'s and Ocean Properties, LTD.'s Request to FPL for Entry Upon Land for Inspection and Other Purposes and Production of Documents.

Respectfully submitted,

Kenneth A. Hoffman, Esq.

J. Stephen Menton, Esq.

Rutledge, Ecenia, Purnell & Hoffman, P.A.

P. O. Box 551

Tallahassee, Florida 32302

Telephone: 850-681-6788

- - and -
R. Wade Litchfield, Esq. Law Department Florida Power & Light Company 700 Universe Boulevard Juno Beach, Florida 33408-0420 Telephone: 561-691-7101

Attorneys for Florida Power & Light Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Florida Power and Light Company's Response and Objection to Southeastern Utility Services, Inc. and Ocean Properties, LTD.'s Request for Entry Upon Land for Inspection and other Purposes and Production of Documents has been furnished by U. S. Mail this 10th day of May, 2004, to the following:

Cochran Keating, Esq. Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Jon C. Moyle, Jr., Esq. Diana K. Shuman, Esq. Moyle, Flanigan, Katz, Raymond & Sheehan, P.A. The Perkins House 118 North Gadsden Street Tallahassee, FL 32301

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FLORIDA POWER & LIGHT

Process Date: 07/14/2004 Time: 10:12 AM

EQUIPMENT SUMMARY REPORT

SERIAL NO: L036292019

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Serial No: 036292019	Mfr: L	Aep Code: CH
Company No: 7019D	Mfr Type: TMT	Form: 6
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FLORIDA POWER & LIGHT

Process Date: 07/14/2004 Time: 10:12 AM

EQUIPMENT SUMMARY REPORT

SERIAL NO: L036292019

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FPL METER TEST REPORT

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