

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power)
Cost Recovery Clause with)
Generating Performance Incentive Factor)
_____)

DOCKET NO. 140001-EI
FILED: November 13, 2014

**CITIZENS' OBJECTIONS TO FLORIDA POWER & LIGHT COMPANY'S
FIRST SET OF INTERROGATORIES (NOS. 1-83)**

Pursuant to Rules 1.340, Florida Rules of Civil Procedure, Rule 28-106.206, Florida Administrative Code, PSC Order No. PSC-14-0084-PCO-EI, issued February 4, 2014, and PSC Order No. PSC-14-0439-PCO-EI, issued August 22, 2014 the Citizens' of Florida, through the Office of Public Counsel ("Citizens" or "OPC"), hereby submit the following initial objections to Florida Power & Light Company's ("FPL's") First Set of Interrogatories (Nos. 1-83) to the Office of Public Counsel.

GENERAL OBJECTIONS

With respect to the "Definitions" and "Instructions" in the requests, Citizens object to any definitions or instructions that are inconsistent with Citizens' discovery obligations under applicable rules. If some question arises as to Citizens' discovery obligations, Citizens will comply with applicable rules and not with any of FPL's definitions or instructions that are inconsistent with those rules.

Citizens objects to each discovery request to the extent that it seeks information that is duplicative, not relevant to the subject matter of this docket, and/or is not reasonably calculated to lead to the discovery of admissible evidence.

Citizens object to each and every request to the extent it is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such discovery requests. Any responses provided by Citizens are provided subject to, and without waiver of, the foregoing objection.

Citizens also object to any request that purports to require Citizens or its experts to prepare studies, analyses, or to do work for OPC that has not been done for Citizens.

Citizens object to any request that calls for information prepared in anticipation of litigation or hearing, for data or information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law. Citizens in no way intends to waive any such privilege or protection.

Citizens reserve the right to supplement any of its responses if Citizens cannot locate the answers immediately due to their magnitude and the work required to aggregate them, or if Citizens later discover additional responsive information in the course of this proceeding. By making these general objections at this time, Citizens do not waive or relinquish its right to assert additional general and specific objections to FPL's discovery.

By making these responses herein, Citizens do not concede that any request is relevant to this action or is reasonably calculated to lead to the discovery of admissible evidence. Citizens expressly reserve the right to object to further discovery into the subject matter of any of these requests, to the introduction of evidence of any response or portion thereof, and to supplement its responses should further investigation disclose responsive information.

In responding to these Requests, Citizens have made a reasonable inquiry of those persons likely to possess information responsive thereto and has conducted a reasonable search of those records in Citizens' possession, custody, or control where the requested information would likely be maintained in the ordinary course of business. To the extent that FPL's requests ask Citizens to go to greater lengths, Citizens object because such requests are overly broad, unduly burdensome, and unreasonable.

Citizens object to providing information to the extent that such information is already in the public record before a public agency such as the Florida Public Service Commission and available through normal procedures or is readily accessible through legal search engines.

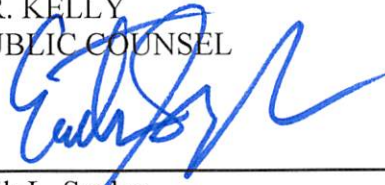
Citizens expressly reserves and does not waive any and all objections it may have to the admissibility, authenticity, or relevance of the information provided in its responses.

In responding to these Requests, Citizens do not waive the foregoing objections, or the specific objections that are set forth in the responses to particular requests.

SPECIFIC OBJECTIONS

No specific objections.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and foregoing **CITIZENS' OBJECTIONS TO FLORIDA POWER & LIGHT COMPANY'S FIRST SET OF INTERROGATORIES (NOS. 1-83)** has been furnished by electronic mail and/or U.S. Mail on this 13th day of November, 2014, to the following:

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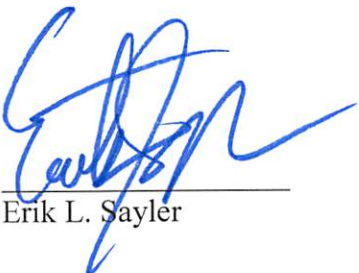
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