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Sent: Friday, April 20, 2012 3:41 PM
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Subject: Electronic Filing / Dkt 120015-EI / FPL's Response in Opposition to Larson Petition to Intervene
Attachments: 4.20.12 FPL Response to Larson Petition to Intervene.pdf
Electronic Filing

a. Person responsible for this electronic filing:

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b. Docket No. 120015 - EI
In re: Petition for rate increase by Florida Power & Light Company

c. The Document is being filed on behalf of Florida Power & Light Company.

d. There are a total of 3 pages

e. The document attached for electronic filing is Florida Power & Light Company's Response in Opposition to Daniel and Alexandria Larson's Petition to Intervene

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FPSC-COMMISSION CLERK

4/20/2012

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for rate increase by Florida
Power & Light Company

Docket No. 120015-EI
April 20, 2012

**FLORIDA POWER & LIGHT COMPANY'S RESPONSE IN OPPOSITION TO
DANIEL AND ALEXANDRIA LARSON'S PETITION TO INTERVENE**

Pursuant to 28-106.204, Florida Administrative Code, Florida Power & Light Company ("FPL") hereby files its response in opposition to the petition to intervene filed by Mr. Daniel R. Larson and Mrs. Alexandria Larson (the "Larsons") on April 13, 2012, and in support thereof states:

1. The Larsons allege that they are residential customers of FPL and seek intervention to address issues that are either common to all residential customers or irrelevant.

2. Generally speaking, the interests of residential customers such as the Larsons are already represented by the Office of Public Counsel ("OPC"). See § 350.0611, Fla. Stat. (providing that "[i]t shall be the duty of the Public Counsel to provide legal representation for the people of the state in proceedings before the commission"). The Larsons allege no particular interest in this proceeding different from that of other retail customers, and they provide no explanation or support for the assertion that their rights and interests cannot be adequately represented by OPC. Further, the Commission should scrutinize the potential for the escalation of costs and rate case expense and the unnecessary utilization of Commission time and resources for participation by individual customers whose interests are already comprehensively represented by OPC.

3. FPL strongly supports the right of customers to participate in the rate case process; however, formal participation as a party is not necessary for individual customers who

are adequately represented by OPC. Rather, participation by individual customers such as the Larsons is better suited to the first phase of the proceeding, consisting of quality of service hearings around the state. Service hearings are specifically addressed to and designed for individual customer participation. Testimony provided by customers at the service hearings will be reflected in the record upon which the Commission will ultimately render its decision. The Larsons can more than adequately participate through providing testimony at a service hearing and allowing OPC to represent their interests at the technical hearing. This would further work to eliminate the unnecessary waste of Commission and party resources that has resulted in the past as a result of participation by these individuals.

WHEREFORE, FPL respectfully requests that the Commission deny the Larsons' petition to intervene for lack of standing.

Respectfully submitted this 20th day of April 2012.

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**CERTIFICATE OF SERVICE
DOCKET NO. 120015-EI**

I HEREBY CERTIFY that a true and correct copy of FPL's Response to Daniel and Alexandria Larson's Petition to Intervene was served electronically this 20th of April 2012, to the following:

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