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Subject: Electronic Filing - Docket No. 120015-EI

Attachments: 120015.FRFObj2FPL1stINT.1stPOD.7-5-12.pdf

a. Person responsible for this electronic filing:

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b. 120015-EI

In Re: Petition for Increase in Rates by Florida Power & Light Company.

c. Document being filed on behalf of the Florida Retail Federation.

d. There are a total of 6 pages.

e. The document attached for electronic filing is the Florida Retail Federation's Objections to Florida Power & Light Company's First Set of Interrogatories (Nos. 1-3) and First Request for Production of Documents (No. 1).

(see attached file: 120015.FRFObj2FPL1stINT.1stPOD.7-5-12.pdf)

Thank you for your attention and assistance in this matter.

Rhonda Dulgar

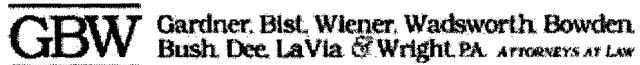
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Increase In Rates)
By Florida Power & Light Company) DOCKET NO. 120015-EI

) FILED: JULY 5, 2012

**THE FLORIDA RETAIL FEDERATION'S OBJECTIONS
TO FLORIDA POWER AND LIGHT COMPANY'S
FIRST SET OF INTERROGATORIES (NOS. 1-3) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1)**

Pursuant to Order No. PSC- 12-0143-PCO-EI, the Florida Retail Federation ("FRF") submits the following Objections to Florida Power & Light Company's (FPL) First Set of Interrogatories (Nos. 1-3) and First Request for Production of Documents (No. 1).

I. General Objections

The FRF makes the following general objections to FPL's First Set of Interrogatories (Nos. 1-3) and First Request for Production of Documents (No. 1). Each of the FRF's objections is subject to and qualified by these general objections.

1. FRF objects to each and every individual discovery request, to the extent it calls for 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, whether such privilege or protection appears at the time response is first made or is later determined to be applicable for any

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reason. The FRF in no way intends to waive, and in fact intends to preserve, to the maximum extent allowed by law, any such privilege or protection.

2. FRF objects to each individual request to the extent it requires production of information that is proprietary, confidential business information without provisions in place to protect the confidentiality of the information. FRF in no way intends to waive claims of confidentiality.

3. FRF objects to any definitions or instructions accompanying the discovery requests to the extent that they are inconsistent with and expand the scope of discovery specified in the Florida Rules of Civil Procedure that are incorporated into the Florida rules of administrative procedure (Section 28-106, Florida Administrative Code) or the Commission's rules on discovery. If any question arises as to FRF's discovery obligations, FRF will comply with applicable rules and not with any of the definitions or instructions accompanying the discovery requests that are inconsistent with or exceed the requirements of those rules. Furthermore, FRF objects to any discovery request that calls for FRF to create data or information that it otherwise does not have because there is no such requirement under the applicable rules and law.

4. FRF objects to any definition or instruction in any discovery request that seeks interrogatory answers containing

information from persons or entities who are not parties to this proceeding or that are not subject to discovery under applicable rules.

5. It is possible that not every relevant document may have been reviewed or considered in developing FRF's responses to the discovery requests. The FRF will provide all the information that FRF obtained after a good faith, reasonable and diligent search conducted in connection with these discovery requests. To the extent that the discovery requests propose to require more, FRF objects to the requests individually and collectively on the grounds that compliance would impose an undue burden or expense on FRF.

6. FRF objects to each discovery request to the extent that it seeks information that is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of evidence that would be admissible in this proceeding.

7. FRF objects to each and every discovery request to the extent it is vague, ambiguous, overly broad, burdensome, or imprecise, and to the extent that any discovery request utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such discovery requests.

8. FRF expressly reserves and does not waive any objections it may have to the admissibility, authenticity, or relevance of the information provided in its responses to the subject discovery requests.

9. FRF objects to each and every request to the extent it seeks information for periods back to 1999 or earlier. Such information is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Further, research about and collection of such information would be unduly burdensome.

10. FRF objects to any request that requires the creation of new data, documents, or studies.

11. FRF objects to providing information already in the public record, that is as easily accessible to FPL as to FRF, or that is already in FPL's possession.

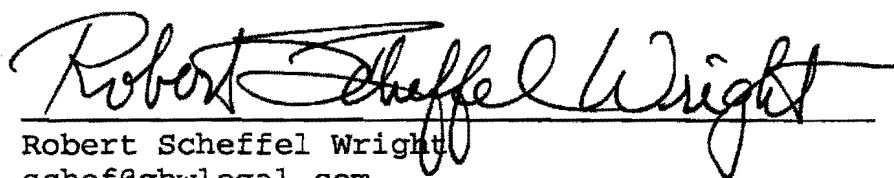
12. FRF objects to every discovery request to the extent the information sought constitutes "trade secrets" which are privileged pursuant to sections 90.506 and 366.093(3)(a), Florida Statutes.

II. Specific Objections to FPL's First Set of Interrogatories
(Nos. 1-3)

13. The FRF specifically objects to Interrogatory No. 3, which requires the identification of "each document" relied upon by a witness. This request is overbroad as the FRF's witness

has many years of experience in utility analysis, including
testifying before 30 state utility regulatory commissions, and
it would be impossible for him to identify "each" document upon
which he may have relied in forming an opinion.

Respectfully submitted this 5th day of July 2012.

A handwritten signature in black ink that reads "Robert Scheffel Wright". The signature is written in a cursive style with a horizontal line underneath it.

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail and U.S. Mail this 5th day of July 2012, to the following:

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