

**Eric Fryson**

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**Sent:** Monday, July 30, 2012 12:56 PM  
**To:** Filings@psc.state.fl.us  
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**Subject:** Electronic Filing - Docket No. 120015-EI - OPC's Objections to FPL's 6th POD  
**Attachments:** Citizens' Objections to FPL 6th POD No. 24.pdf  
 Electronic Filing

a. Person responsible for this electronic filing:

Patricia A. Christensen, Associate Public Counsel  
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 c/o The Florida Legislature  
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b. Docket No. 120015-EI

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

c. Documents being filed on behalf of the Office of Public Counsel

d. There are a total of 5 pages.

e. The document attached for electronic filing is: Citizens' Objections to FPL's 6<sup>th</sup> Set of POD's (No. 24)

Thank you for your attention and cooperation to this request.

Phyllis W. Philip-Guide  
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 Office of Public Counsel  
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OFFICIAL

DOCUMENT NUMBER-DATE

05062 JUL 30 2012

FPSC-COMMISSION CLERK

7/30/2012

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

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Docket No: 120015-EI

Filed: July 30, 2012

**CITIZENS' OBJECTIONS TO FLORIDA POWER AND LIGHT'S SIXTH SET OF  
REQUESTS FOR PRODUCTION OF DOCUMENTS  
(NO. 24)**

Office of Public Counsel, ("Citizens"), by the requirements set forth in the Commission Order No. PSC-12-0143-PCO-EI, Rule 28-106-206, Florida Administrative Code, and Rule 1.340, Florida Rules of Civil Procedure, submit the following response to the Sixth Set of Requests for Documents (No. 24) propounded by Florida Power and Light (FPL) on July 13, 2012.

**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 the definitions or instructions that are inconsistent with those rules.

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.

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Citizens object to the extent any discovery request is unduly burdensome. Citizens further object to any requests that would require Citizens and/or its consultants to perform a new study or analysis.

Citizens generally object to any request that calls for data or information protected by the attorney-client privilege, the work product privilege, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law.

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.

Citizens object to providing information to the extent that such information is already in the public record before the Florida Public Service Commission and available to FPL through normal procedures.

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.

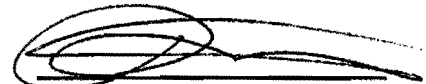
**ADDITIONAL SPECIFIC OBJECTIONS**

In addition to the general objections which apply to every interrogatory, Citizens provide the following objections to specific interrogatories:

**DOCUMENTS REQUESTED**

24. Regarding OPC Witness Vondle's testimony at page 37, please provide copies of all decisions in which a Commission has required compensation for the use of the utility's name by its affiliates.

**RESPONSE:** Citizens have no specific objection at this time. However, Citizens reserve the right to assert any additional objections based on confidentiality and/or privilege that come to Citizens' attention during the preparation of the discovery.



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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was furnished by e-mail and

U.S. Mail this 30th day of July, 2012 to:

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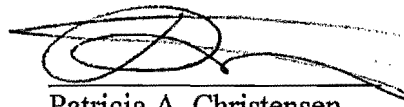
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