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GENERAL COUNSEL
S. CURTIS KISER
(850) 413-6199

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Public Service Commission

October 6, 2011

Mr. John T. Burnett, Esq.
Associate General Counsel
Progress Energy Florida, Inc.
Post Office Box 14042
St. Petersburg, Florida 33733-4042

STAFF'S FIRST DATA REQUEST

Re: Docket No. 110219-EI - Complaint No. 973806E of Casey E. and Allison L. Seaman against Progress Energy Florida, Inc., for alleged improper billing.

Dear Mr. Burnett:

By this letter, the Commission staff requests that Progress Energy Florida, Inc. (PEF) provide responses to the following data requests.

1. What type of meter is meter No. 5834154 (Seamans' old meter) (e.g. electromechanical, solid state, smart meter)?
2. How was the meter initialized when first installed at the customers premises?
3. What type of meter is the Seamans' new meter No. 5488188?
4. How was it initialized when installed?
5. What does the term "re-set the meter" mean?
 - a. Please explain the procedure for re-setting the meter?

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6. Does PEF ever re-set any of its meters?
 - a. If yes, please explain under what circumstances would a meter be re-set?
 - b. Does re-setting the meter affect the test for meter accuracy?
 - c. Does re-setting a meter erase the usage information recorded on the meter prior to the reset?
 - d. Does re-setting a meter involve removal and/or replacement of any batteries?
7. Is it customary for field crews inspecting or servicing meters to inform customers that their meter needs to be re-set?
 - a. If yes, under what circumstances would the field crew inform the customer of the re-set?
8. Please provide any written procedural manual regarding PEF's field crew's instructions on communications with customers during investigation of meter complaints?
9. Please explain the procedure used to perform the two meter tests of the Seamans' old meter No. 5834154.
10. Was the Seamans' old meter No. 5834154 "re-set" prior to either of the meter accuracy tests?
11. Please provide all records, notes, or report or any other source of data gathered by the technician(s) from July 2010 to present for the Seamans regarding meter No. 5834154.
12. What is the current balance of the Seaman's disputed amount?
 - a. Are the Seamans current on their payments for the undisputed portion of their bills?
13. How long have the Seamans taken service at their current address?
14. After service was first initiated at that address, was the Seamans' meter ever replaced prior to September 2010?
 - a. If yes, what were the circumstances surrounding the replacement?
15. Prior to July 2010, did the Seamans ever filed a complaint or question the accuracy of meter No. 5834154 with PEF?
16. Why was the Seamans' meter No. 5834154 replaced in September 2010? Please provide a copy of the work order for the meter replacement.

Mr. John Burnett

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Please file the original and five copies of the requested information by October 20, 2011, with Ms. Ann Cole, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6183 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Robinson', with a long horizontal flourish extending to the right.

Pauline E. Robinson

Attorney

Office of the General Counsel

PR

cc: Office of Commission Clerk