

Eric Fryson

From: Thomas Saporito [saporito3@gmail.com]
Sent: Monday, September 17, 2012 4:33 PM
To: Filings@psc.state.fl.us
Cc: Algenol; Brian P. Armstrong; Captain Samuel T. Miller; Caroline Klancke; Charles Rehwinkel; Daniel R. Larson; J. Peter Ripley; J.R.Kelly; John T. Butler; John T. LaVia; John W. Hendricks; Jon C. Moyle; Jordon White; Joseph A. McGlothlin; Karen White; Keino Young; Kenneth L. Wiseman; Larry Nelson; Larry Nelson; Lisa M. Purdy; Maria J. Moncada; Mark F. Sundback; Martha Brown; Patty Christensen; R. Wade Litchfield; Robert Scheffel Wright; Tarik Noriega; Thomas Saporito; Tricia Merchant; Vicki Gordon Kaufman; William C. Garner; William M. Rappolt
Subject: Docket No. 120015-EI Thomas Saporito's Third Set of Data Requests (Nos. 23-24) To Florida Power and Light Company Regarding Settlement Agreement
Attachments: 2012.09.17 Third Set of Data Requests to FPL.pdf

Electronic Filing

a. Person responsible for this electronic filing:

Thomas Saporito

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b. Docket No. 120015-EI

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

c. The document(s) is/are being filed on behalf of Thomas Saporito.

d. The total number of pages is 5.

e. Brief description of documents being filed:

- Thomas Saporito's Third Set of Data Requests (Nos. 23-24) To Florida Power and Light Company Regarding Settlement Agreement

Thank you for your cooperation and timely attention to this electronic filing.

s/Thomas Saporito

9/17/2012

DOCUMENT NUMBER-DATE

06226 SEP 17 2012

FPSC-COMMISSION CLERK

Thomas Saporito
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**In re: Petition for Rate Increase by
Florida Power and Light Company**

**Docket No. 120015-EI
Served: 17 SEPT 2012**

**THOMAS SAPORITO'S THIRD SET OF DATA REQUESTS (Nos. 23-24) TO FLORIDA
POWER AND LIGHT COMPANY REGARDING PROPOSED SETTLEMENT**

Thomas Saporito (Saporito) pursuant to Florida Public Service Commission (Commission) Order No. PSC-12-0440-PCO-EO, (Order), hereby propounds the following data requests on the Florida Power and Light Company (FPL), and requests that they be answered separately, fully and within (5) days as set forth in the Commission's Order.

INSTRUCTIONS

1. If any of the following data requests cannot be answered in full after exercising due diligence to secure the information, please so state and answer to the extent possible, specifying your inability to answer the remainder, and state whatever information you have concerning the unanswered portion. If your answer is qualified in any respect, please set forth the details of such qualifications.
2. If you object to fully identifying a document or oral communication because of a privilege, you must nevertheless provide the following information, unless divulging the information would disclose the privileged information:
 - a. the nature of the privilege claimed (including work product);
 - b. the date of the document or oral communication;
 - c. if a document; its type (correspondence, memorandum, facsimile etc.), custodian, location, and such other information sufficient to identify the document for a subpoena duces tecum or a document request, including where appropriate the author, the addressee, and, if not apparent, the relationship between the author

- and addressee;
- d. if an oral communication, the place where it was made, the names of the persons present while it was made, and, if not apparent, the relationship of the persons present to the declarant; and
 - e. the general subject matter of the document or the oral communication.
3. If you object to all or part of any data request and refuse to answer that part, state your objection, identify the part to which you are objecting, and answer the remaining portion of the data request.
 4. Whenever a data request calls for information which is not available to you in the form requested, but is available in another form, or can be obtained at least in part from other data in your possession, so state and either supply the information requested in the form in which it is available, or supply the data from which the information requested can be obtained.
 5. The singular shall include the plural and vice versa; the terms "and" and "or" shall be both conjunctive and disjunctive; and the term "including" means "including without limitation."
 6. These data requests shall be answered by you or through your agent who is qualified to answer and who shall be fully identified, with said answers being served as provided pursuant to the Florida Rules of Civil Procedure or order of the Commission.

DATA REQUESTS

23. Was Larry Nelson, an intervenor representing his interests on a *pro se* basis, provided notice of or otherwise included in any settlement negotiations?
 - If yes, on what date was Mr. Nelson provided notice?
 - If no, why was Mr. Nelson not provided notice of or otherwise included in any settlement negotiations?

24. Was Mr. and Mrs. Daniel R. Larson, intervenors representing their interests on a *pro se* basis, provided notice of or otherwise included in any settlement negotiations?
- If yes, on what date were the Larsons provided notice?
 - If no, why were the Larsons not provided notice of or otherwise included in any settlement negotiations?

Respectfully submitted this 17th day of
September 2012.

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Phone: (561) 972-8363
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By: _____

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

I HERBY CERTIFY that a true and correct copy of the foregoing document was served electronically via email/link on this 17th day of September 2012 to the following:

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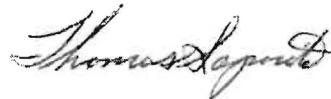
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