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Steel Hector & Davis

Tallahassee, Florida

Matthew M. Childs, P.A.
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ORIGINAL
FILE COPY

February 10, 1995

Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399

RE: DOCKET NO. 950001-EI

Dear Ms. Bayo:

Enclosed for filing please find an original and fifteen (15) copies of Florida Power & Light Company's Objections to Florida Steel Corporation's First Set of Interrogatories to Florida Power & Light Company (Nos 1-6).

Very truly yours,

[Handwritten Signature]
Matthew M. Childs, P.A.

ACK _____
AFA _____
APP _____
MMC/ml _____

cc: All Parties of Record

CFR _____
EPP *Duckley* - 5 _____
LEG *1* _____
LIT *1* _____
LIT _____
REG _____
SEC *1* _____
WTS _____

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DEPARTMENT OF RECORDS

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FPSC-RECORDS/REPORTING

to these interrogatories as it understands its duty under law notwithstanding any Instruction or Definition by Florida Steel to the contrary. To the extent that Florida Steel's Instructions and definitions alter or expand such duty, FPL objects.

Objection to Instruction 1

In paragraph 1 of the section of its First Interrogatories entitled "Instructions," Florida Steel states:

"Provide the name, address and relationship to the Company of each person providing answers to the following inquiries and identify which question(s) each person answered."

FPL does not object to providing the information requested in Instruction 1. However, FPL believes that the instruction itself actually constitutes interrogatories and not instructions. Therefore, FPL considers this "Instruction" to count against the 100 interrogatory limit contained in the Commission's Order Establishing Procedure. See Order No. PSC-95-0106-PCO-EI issued January 20, 1995. Although Florida Steel's First Interrogatories are numbered 1 through 6, FPL views the First Interrogatories as consisting of at least 19 separate interrogatories.

receive natural gas during the period January 1, 1994 through December 31, 1995:

- a. The term of the agreement
- b. The minimum take in MMBtu per month
- c. The cost in \$/MMBtu per month
- d. The actual amount received each month in MMBtu
- e. The actual cost to FPL under the agreement each month

FPL objects to Request 2. Any information beyond September 1995 is beyond the scope of the issues properly raised and before the Commission in this Docket. Therefore, the request exceeds the subject matter of this Docket and is not reasonably calculated to lead to the discovery of admissible evidence. Moreover, subparagraphs b, c, d, and e of this Request request proprietary confidential business information. FPL reserves the fullest protection for its proprietary confidential business information as is permissible under Florida law. FPL will take appropriate steps to protect its confidential documents and information pursuant to Commission Rule and Section 366.093, Florida Statutes.

In paragraph 3 of the section of its First Interrogatories entitled "Interrogatories," Florida Steel states:

Please provide the following information for each natural gas transmission agreement and contract under which FPL has received or will receive natural gas transmission service during the period January 1, 1994 through December 31, 1995:

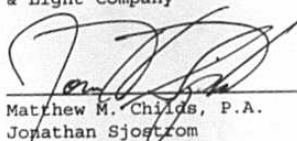
- a. The term of the agreement
- b. The contract demand in MMBtu
- c. The demand and commodity rate in \$/MMBtu
- d. The actual demand each month in MMBtu
- e. The actual commodity delivered each month in MMBtu
- f. The actual cost to FPL under the agreement each month

FPL objects to Request 3. Any information beyond September 1995 is wholly beyond the scope of the issues properly raised and before the Commission in this Docket. Therefore the request is not

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Respectfully submitted,

STEEL HECTOR & DAVIS
215 South Monroe Street
Suite 601
Tallahassee, FL 32301-1804
Attorneys for Florida Power
& Light Company



Matthew M. Childs, P.A.
Jonathan Sjoström

**CERTIFICATE OF SERVICE
DOCKET NO. 950001-EI**

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Objections to Florida Steel Corporation's First Set of Interrogatories to Florida Power & Light Company (Nos. 1-6) have been furnished by Hand Delivery** or U.S. Mail this 10th day of February, 1995, to the following:

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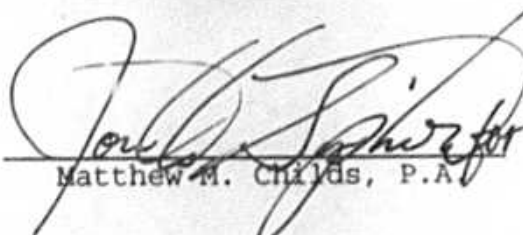
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