## STATE OF FLORIDA

Commissioners: E. Leon Jacobs, Jr., Chairman J. Terry Deason Lila A. Jaber Braulio L. Baez Michael A. Palecki



OFFICE OF GENERAL COUNSEL HAROLD A. MCLEAN (850) 413-6199

## Hublic Service Commission

October 1, 2001

VIA FACSIMILE

Matthew M. Childs, Esquire Steel, Hector & Davis 215 South Monroe Street Suite 601 Tallahassee, FL 32301-1804

Re: Docket No. 001148-EI (GridFlorida)

Dear Matt:

As we discussed, staff wishes to offer as an exhibit or exhibits to be put in evidence certain of Florida Power & Light Company's responses to staff discovery in this docket. Pursuant to the request in your September 27, 2001, letter, staff has preliminarily identified the following responses to interrogatories as material we wish to offer:

Interrogatories Nos. 9-15, 20-29, 31, 45, 50-53, 60-64, 71-81, 84-107, 109, 110, 115, 118-121, 123, 124, 129-131, 133-140, 157-160, 163, 164, 173, 175-195

Staff also wishes to offer FPL's responses to Requests for Production of Documents Nos. 1, 2, 6-9, and 12-15.

This list is preliminary because staff has not yet completed its review of FPL's responses to Staff's Fourth Set of Interrogatories and Staff's Fourth Request for Production of Documents. After this review is complete, I will have a more precise list to provide you. However, I anticipate that the list provided will not change significantly. This preliminary list is offered as a starting point for FPL's consideration. Matthew M. Childs, Esquire Page 2 October 1, 2001

At this time, I have not prepared a breakdown of the listed discovery responses by related issue and intended purpose. I believe the majority of this material is related to Issue 2, 3, and 4 (estimated costs and benefits) and would be offered, in staff's view, to help complete the record on these issues rather than to prove or disprove any particular position.

Sincerely,

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Wm. Cochran Keating IV Staff Counsel

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cc: Parties of Record