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August 20, 2002

Robert L. Powell, Jr.  
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VIA FEDERAL EXPRESS

Ms. Blanca Bayó  
Division of the Commission Clerk  
and Administrative Services  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399

Re: Docket Nos. 020262-EI, 020263-EI

Dear Ms Bayó :

Enclosed for filing on behalf of Florida Power & Light Company in Docket Nos. 202062-EI and 020263-EI are the original and seven copies of the following:

Florida Power & Light Company's Notice of Serving Responses to Staff's Second Request for Production of Documents (Nos. 1-19) and Second Set of Interrogatories (Nos. 1-36); and

Florida Power & Light Company's Notice of Intent to Seek Confidential Classification of Certain Documents Responsive to Staff's Second Request for Production of Documents ("Notice of Intent").

The Notice of Intent pertains to certain documents responsive to Staff's Second Request for Production of Documents, Request Nos. 17, 18, and 19. Exhibit A to the Notice of Intent are copies of these discovery requests. I have also enclosed a disk, which contains the above-referenced filings. If you have any questions regarding this transmittal, please contact me at (305) 552-4027.

Very truly yours,



Robert L. Powell, Jr., Esq.

Enclosures

cc: Counsel for parties of record

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DISTRIBUTION CENTER

Intent to request conf. DOCUMENT NUMBER - DATE  
08820 AUG 21 02

08820 AUG 21 02

FPSC-COMMISSION CLERK

Notice of Serving Responses DOCUMENT NUMBER - DATE  
08819 AUG 21 02

08819 AUG 21 02

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Petition of Florida Power & Light  
Company for a determination of need for  
a power plant proposed to be located  
in Martin County**

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**Docket No. 020262-EI**

**In re: Petition of Florida Power & Light  
Company for a determination of need for  
a power plant proposed to be located  
in Manatee County**

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**Docket No. 020263-EI**

**Dated: August 20 2002**

**FLORIDA POWER & LIGHT COMPANY'S NOTICE OF INTENT TO REQUEST  
CONFIDENTIAL CLASSIFICATION OF CERTAIN DOCUMENTS RESPONSIVE  
TO STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Florida Administrative Code Rule 25-22.006(3)(a), Florida Power & Light Company ("FPL") files this Notice of Intent to Request Confidential Classification of Certain Documents Responsive to Staff's Second Request for Production of Documents ("Notice"). This Notice relates to FPL's responses to Requests for Production of Documents Nos. 17, 18, and 19. A copy of Staff's discovery requests giving rise to these responses is appended hereto as Exhibit A. FPL, pursuant to Rule 25-22.006(3)(a), requests confidential handling of certain documents furnished in response to these discovery requests.

DOCUMENT NUMBER DATE

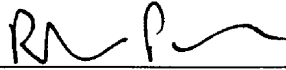
08820 AUG 21 08

FPSC-COMMISSION CLERK

R. Wade Litchfield, Esq.  
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Florida Power & Light Company  
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Juno Beach, Florida 33408-0420  
Telephone: 561-691-7101

Respectfully submitted,

Steel Hector & Davis LLP  
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Telephone: 305-577-2859

By:   
Robert L. Powell, Jr., Esq.  
Florida Bar No. 0195464

**CERTIFICATE OF SERVICE**  
**Docket Nos. 020262-EI and 020263-EI**

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Notice of Intent to Request Confidential Classification of Certain Documents Responsive to Staff's Second Request for Production of Documents has been furnished by overnight courier or U.S. Mail (\*) this 20th day of August, 2002, to the following:

Martha Carter Brown, Esq.  
Lawrence Harris, Esq.  
Legal Division  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
Mbrown@psc.state.fl.us

Michael Twomey\*  
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By:   
Robert L. Powell, Jr.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to determine need for an electrical power plant in Martin County by Florida Power & Light Company.

DOCKET NO. 020262-EI

In re: Petition to determine need for an electrical power plant in Manatee County by Florida Power & Light Company.

DOCKET NO. 020263-EI

DATED:

STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO  
FLORIDA POWER AND LIGHT COMPANY (NOS. 1 - 19)

Pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, the Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby serves the following Request for Production of Documents upon Florida Power and Light Company.

Please produce the following documents at the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Gerald L. Gunter Building, Tallahassee, Florida 32399-0850, no later than twenty-four days after service of this request for the purpose of inspection and copying:

DEFINITION

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or record, including but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intraoffice memorandum, memorandum reflecting an oral communication,

EXHIBIT A

handwritten or other notes, working paper, draft, application, permit, chart, paper, graph, survey, index, tape, disc, data sheet or data processing card, computer printout, or any other written, recorded, transcribed, filed or graphic matter, however produced or reproduced.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Provide a copy of the economic analyses used for FP&L's load forecasts including, but not limited to:
  - b. the DRI-WEFA written analysis for the latest forecast;
  - c. the Manufacturers Alliance Economic Outlook;
  - d. the Goldman-Sachs economic outlook;
  - e. the Blue Chip Economic Indicators.

COMMISSION'S SECOND SET OF PRODUCTION OF DOCUMENTS TO  
FLORIDA POWER AND LIGHT COMPANY (NOS. 1 - 19)  
DOCKETS NOS. 020262-EI, 020263-EI  
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2. Provide a copy of the work papers for the population growth estimates used to develop the customer forecasts on FP&L's load forecasts.

3. Provide the source and historical data for Florida Non-Agricultural Employment used in the forecast.





COMMISSION'S SECOND SET OF PRODUCTION OF DOCUMENTS TO  
FLORIDA POWER AND LIGHT COMPANY (NOS. 1 - 19)  
DOCKETS NOS. 020262-EI, 020263-EI  
PAGE 5

6. Provide copies of all prepared handouts distributed, and presentations made, at meetings with local government agencies or community groups regarding FPL's proposed Martin and Manatee units.

7. Provide copies of all prepared handouts distributed, and presentations made, at meetings with FPL management regarding the Supplemental RFP evaluation process.





COMMISSION'S SECOND SET OF PRODUCTION OF DOCUMENTS TO  
FLORIDA POWER AND LIGHT COMPANY (NOS. 1 - 19)  
DOCKETS NOS. 020262-EI, 020263-EI  
PAGE 8

12. Provide a complete copy of the May 24, 1993 S&P Creditweek article cited by FPL witness William Avera at page 7 of his direct testimony.

13. Provide a complete copy of the October 8, 1990 Moody's Electric Utility Week article cited by FPL witness William Avera at page 7 of his direct testimony.

COMMISSION'S SECOND SET OF PRODUCTION OF DOCUMENTS TO  
FLORIDA POWER AND LIGHT COMPANY (NOS. 1 - 19)  
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PAGE 9

14. Provide a complete copy of the November 1991 S&P Creditweek article cited by FPL witness William Avera at page 9 of his direct testimony.

15. Provide a complete copy of the December 3, 1998 S&P RatingsDirect article cited by FPL witness William Avera at page 10 of his direct testimony.

COMMISSION'S SECOND SET OF PRODUCTION OF DOCUMENTS TO  
FLORIDA POWER AND LIGHT COMPANY (NOS. 1 - 19)  
DOCKETS NOS. 020262-EI, 020263-EI  
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16. Provide complete copies of the two Wall Street Journal articles dated December 19, 2001 and January 21, 2002 cited by FPL witness William Avera at page 14 of his direct testimony.

17. Provide copies of all reports or reviews for FPL and FPL Group, Inc., prepared by or for investment banking firms since January 1, 2002. Exclude any documents not already provided in FPL's response to Staff's Request for Production of Documents #1, dated May 1, 2002.

18. Provide copies of all reports or reviews for FPL and FPL Group, Inc., prepared by or for Standard & Poors since January 1, 2002. Exclude any documents not already provided in FPL's response to Staff's Request for Production of Documents #2, dated May 1, 2002.
19. Provide copies of all reports or reviews for FPL and FPL Group, Inc., prepared by or for Moody's Investor Services since January 1, 2002. Exclude any documents not already provided in FPL's response to Staff's Request for Production of Documents #3, dated May 1, 2002.

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MARTHA CARTER BROWN  
Senior Attorney  
FLORIDA PUBLIC SERVICE COMMISSION  
2540 Shumard Oak Blvd.  
Tallahassee, Florida 32399-0850  
(850) 413-6187

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to determine  
need for an electrical power  
plant in Martin County by  
Florida Power & Light Company.

DOCKET NO. 020262-EI

In re: Petition to determine  
need for an electrical power  
plant in Manatee County by  
Florida Power & Light Company.

DOCKET NO. 020263-EI

DATED:

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of  
COMMISSION'S SECOND SET OF PRODUCTION OF DOCUMENTS TO FLORIDA POWER  
AND LIGHT COMPANY (NOS. 1 - 19) has been served by facsimile(\*) and  
U.S. Mail to Mr. Charles Guyton, Esquire, Steel Hector & Davis, 215  
South Monroe Street, Suite 610, Tallahassee, FL 32301-1804, on  
behalf of Florida Power and Light Company, and that a true and  
correct copy thereof has been furnished by facsimile (\*) or U. S.  
Mail this 1<sup>st</sup> day of August, 2002 to the following:

Mr. Bill Walker  
215 S. Monroe St., #810  
Tallahassee, FL 32301-1859

\*Robert Scheffel Wright, Esquire  
Diane K. Kiesling, Esquire  
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Landers & Parsons, P.A.  
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