

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.

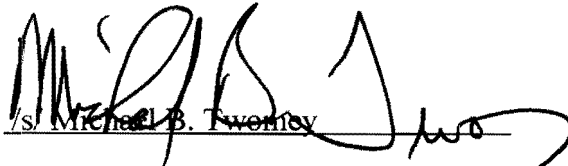
) Docket No. 020263-EI

) Served: September 23, 2002

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COMMISSION  
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**-CORRECTED-**  
**FACT'S NOTICE OF SERVING REVISED RESPONSES TO FLORIDA  
POWER & LIGHT COMPANY'S FIRST REQUEST FOR PRODUCTION  
OF DOCUMENTS AND FIRST SET OF INTERROGATORIES**

The Florida Action Coalition Team ("FACT") hereby gives notice of serving its revised responses to Florida Power & Light Company's First Request for Production of Documents and Florida Power & Light Company's (FPL's) First Set of Interrogatories to Elizabeth C. Daley, counsel for Florida Power & Light Company, with copies to parties of record, on September 23, 2002.

  
/s/ Michael B. Twomey

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FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the foregoing has been transmitted electronically

and/or by U.S. Mail this 23<sup>th</sup> day of September, 2002:

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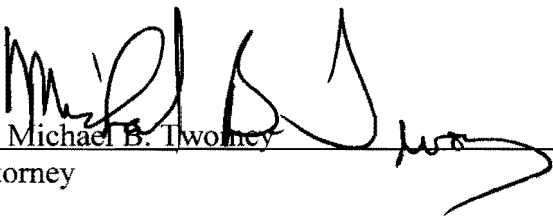
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/s/ Michael B. Twomey  
Attorney

**Response to Request for Production (No. 13)**

See response to Request No. 5.

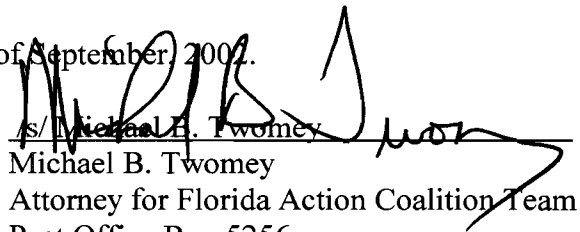
**Response to Request for Production (No. 14)**

As previously stated, FACT has no formal membership and, consequently, FACT took no formal vote on the decision to petition to intervene in FPL's present Determination of Need proceedings. Rather, the individuals contacted by Ernie Bach or their own organizational leadership, if members of other organizations, indicated their approval of FACT's petition to intervene by providing their names and addresses for inclusion in the amended petition to intervene, as provided in the initial discovery responses, or the 53 witnessed statement provided in Attachment B.

**Response to Request for Production (No. 15)**

FACT stands on its earlier response to this request, which is that there is no correspondence or other communications between FACT and any other party in FPL's Determination of Need proceedings, except for those pleadings or incidental communications that are part of the public record and already provided to FPL and, further, that all communications between FACT and the Florida Public Service Commission in connection with FPL's Determination of Need proceedings are a matter of public record, and, as best as FACT can determine, all are contained within the Commission's official files for these dockets.

Respectfully submitted this 23<sup>th</sup> day of September, 2002.

  
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**-CORRECTED-**

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the foregoing was filed with the Florida Public Service

Commission on September 20, 2002 but not served on those listed below by hand delivery or by U.S.

Mail until the 23<sup>th</sup> day of September, 2002:

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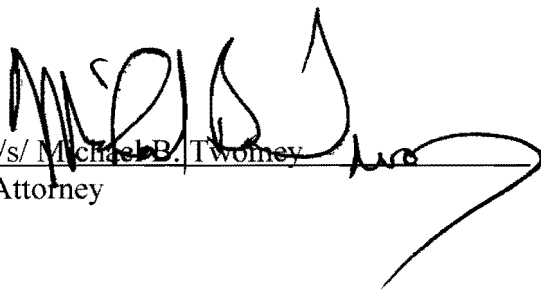
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Attorney

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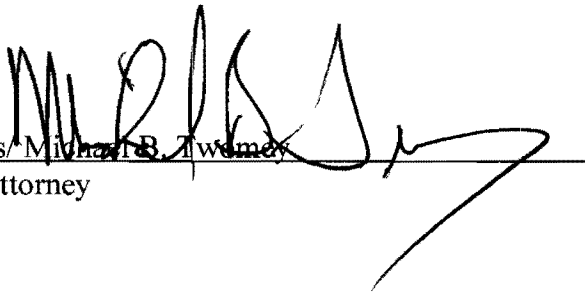
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