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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.

DATED: OCTOBER 10, 2003

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one correct copy of STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA POWER & LIGHT COMPANY (NOS. 1-2) has been sent by U. S. Mail and via electronic mail to John T. Butler, Esquire, Steel, Hector & Davis Law Firm, on behalf of Florida Power & Light Company, and that a true and correct copy thereof has been furnished to the following, by electronic mail and U.S. Mail, this 10th day of October, 2003:

Progress Energy Florida, Inc. James McGee P. O. Box 14042 St. Petersburg, FL 32733-4042 Florida Power & Light Co. Bill Walker 215 South Monroe Street, Ste. 810 Tallahassee, FL 32301-1859

Florida Industrial Power Users Group c/o John McWhirter, Jr. McWhirter Reeves Law Firm 400 N. Tampa Street, Ste. 2450 Tampa, FL 33602

Florida Public Utilities Co. George Bachman P. O. Box 3395 West Palm Beach, FL 33402-3395

CAF CMP COM CTR ECR GCL OPC OPC MMS SEC

AUS

Gulf Power Company Susan D. Ritenour One Energy Place Pensacola, FL 32520-0780 McWhirter Law Firm Vicki Kaufman 117 S. Gadsden Street Tallahassee, FL 32301

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CERTIFICATE OF SERVICE DOCKET NO. 030001-EI PAGE 2

Messer Law Firm Norman H. Horton, Jr. P. O. Box 1876 Tallahassee, FL 32302-1876

Ausley & McMullen Law Firm James Beasley/Lee Willis P. O. Box 391 Tallahassee, FL 32302

Beggs & Lane Law Firm Jeffrey Stone & Russell Badders P. O. Box 12950 Pensacola, FL 32591-2950

Greenberg, Traurig Law Firm Ronald LaFace/Seann M. Frazier 101 East College Avenue Tallahassee, FL 32301 Office of Public Counsel Charlie Beck/Rob Vandiver c/o The Florida Legislature 111 W. Madison Street, #812 Tallahassee, FL 32399-1400

Tampa Electric Company Angela Llewellyn Regulatory Affairs P. O. Box 111 Tampa, FL 33601-0111

Florida Retail Federation John Rogers, Esquire 227 South Adams Street Tallahassee, FL 32301

WM. COCHRAN KEATING IV

Senior Attorney

FLORIDA PUBLIC SERVICE COMMISSION

2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

(850) 413-6193

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.

DOCKET NO. 030001-EI

DATED: OCTOBER 10, 2003

STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA POWER & LIGHT COMPANY (NOS. 1~2)

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 & 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 thirty 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,

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STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA POWER & LIGHT COMPANY (NOS. 1-2) DOCKET NO. 030001-EI PAGE 2

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.

DOCUMENTS REQUESTED

1. Please provide all workpapers showing derivation of the 12CP Load Factors based on Florida Power & Light Company's load research study as shown in the testimony of Korel M. Dubin, filed with the Commission on September 12, 2003, Exhibit KMD-6, Appendix III, Page No. 4 of 5, Column (1). STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA POWER & LIGHT COMPANY (NOS. 1-2) DOCKET NO. 030001-EI PAGE 3

Please provide all workpapers pertaining to the derivation of the jurisdictional separation factor as shown in the testimony of Korel M. Dubin, filed with the Commission on September 12, 2003, Exhibit KMD-6, Appendix III, page 3 of 5, line 10.

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WM. COCHRAN KEATING IV

Senior Attorney

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