

Steel Hector & Davis

Tallahassee, Florida

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ORIGINAL
FILE COPY

February 20, 1995

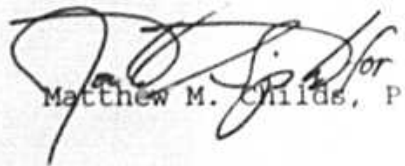
Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
101 East Gaines Street
Tallahassee, FL 32399

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 Third Request for Production of Documents to Florida Power & Light Company (Nos. 14-19).

Very truly yours,



Matthew M. Childs, P.A.

- ACK
- AFA
- APP
- CAP
- CMR MMC/ml
- CT cc: All Parties of Record
- EM *Linkley 5*
- LE *1*
- LE *4*
- REC
- REV
- ST *1*
- WPH
- OTH

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DIVISION OF RECORDS
29

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01963 FEB 20 1995
FPSC-RECORDS/REPORTII

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL
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IN RE: Investigation of Fuel Cost)
Recovery Clauses of Electric) DOCKET NO. 950001-EI
Companies) FILED: FEBRUARY 20, 1995
_____)

FLORIDA POWER & LIGHT COMPANY'S
OBJECTIONS TO FLORIDA STEEL CORPORATION'S
THIRD REQUEST FOR PRODUCTION OF DOCUMENTS
TO FLORIDA POWER & LIGHT COMPANY (NOS. 14-19)

Florida Power & Light Company ("FPL"), pursuant to Rule 25-22.034, Florida Administrative Code, the Florida Rules of Civil Procedure and the Order Establishing Procedure, hereby files these objections to Florida Steel Corporation's ("Florida Steel") "Third Request for Production to Florida Power & Light Company (NOS. 14-19)" ("Third Request for Production") and states:

Objection to Instructions and Definitions

Florida Steel provides directions on various topics and definitions of various words, many, if not all, of which are

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FPSC-RECORDS/REPORTING

governed by the Rules of the Commission, the Commission's Order Establishing Procedure, the Florida Rules of Civil Procedure, Florida Statutes, and Florida common law. FPL intends to respond to these requests for production 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 Third Request for Production entitled "Instructions," Florida Steel states:

If any document is withheld under any claim of privilege, please furnish a list identifying each document for which privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document and basis upon which such privilege is claimed.

FPL objects to Instruction 1. FPL claims and does not waive the fullest protection of the attorney-client privilege, the work-product doctrine, and all other applicable privileges and exemptions from disclosure. FPL intends to undertake all steps necessary to protect its privileged communications as required by

the Rules of the Commission, the Florida Rules of Civil Procedure and Florida law.

OBJECTIONS TO "DOCUMENTS REQUESTED"

Objection to Request 17

In paragraph 17 of the section of its Third Request for Production entitled "Documents Requested," Florida Steel states:

"Please provide all workpapers supporting FPL's estimated fixed gas charges of \$133.2 million for the period April 1995 through September 1995."

FPL objects to request 17. This request encompasses 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. Furthermore, FPL views this request as redundant of Request 1 of Florida Steel's First Request for Production to Florida Power & Light Company (NOS. 1-10).

Objection to Request 18

In paragraph 18 of the section of its Third Request for Production entitled "Documents Requested," Florida Steel states:

"Please provide each FPL workpaper supporting FPL's estimated Btu burned per kWh for the period December 1994 through September 1995, and actual Btu burned per kWh for October and November 1994."

FPL objects to request 18. FPL views this request as redundant of Request 1 of Florida Steel's First Request for Production to Florida Power & Light Company (NOS. 1-10).

Objection to Request 19

In paragraph 19 of the section of its Third Request for Production entitled "Documents Requested," Florida Steel states:

"Please provide a copy of each workpaper prepared by or for FPL which supports FPL's estimated natural gas cost per MMBtu for the period December 1994 through September 1995."

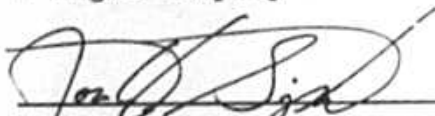
FPL objects to request 19. FPL views this request as redundant of

Request 1 of Florida Steel's First Request for Production to
Florida Power & Light Company (NOS. 1-10).

DATED this 20th day of February, 1995.

Respectfully submitted,

STEEL HECTOR & DAVIS
215 South Monroe Street
Suite 601
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Attorneys for Florida Power
& Light Company



Matthew M. Childs, P.A.
Jonathan Sjostrom

**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 Third Request for Production of Documents to Florida Power & Light Company (Nos. 14-19) have been furnished by Hand Delivery** or U.S. Mail this 20th day of February, 1995, to the following:

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