

Steel Hector & Davis

Tallahassee, Florida

Matthew M. Childs, P.A.
(904) 222-4448

July 26, 1995

Ms. Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
4075 Esplanade Way, Room 110
Tallahassee, FL 32399-0850

RE: **DOCKET NO. 950001-EI**

Dear Ms. Bayó:

Enclosed for filing in the above referenced docket please find Florida Power & Light Company's Notice of Intent to Request Confidential Classification.

Very truly yours,



Matthew M. Childs, P.A.

MMC/ml

cc: Kenneth Dudley, FPSC, Division of Electric and Gas
Vicki D. Johnson, Esq., Legal Division


This Notice of intent was filed with Confidential Documents No.s 07134-95+ 07135-95. These documents have been placed in the confidential files pending receipt of a request for confidential treatment.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Investigation of Fuel) DOCKET NO. 950001-EI
Cost Recovery Clauses of Electric)
Utilities) FILED: JULY 26, 1995

FLORIDA POWER & LIGHT COMPANY'S
NOTICE OF INTENT TO REQUEST
CONFIDENTIAL CLASSIFICATION

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. This Notice relates to Staff's Second Set of Interrogatories (Nos. 10-14) dated July 14, 1995 and Staff's First Request for Production of Documents to Florida Power & Light Company (Nos. 1-2) dated July 14, 1995. Copies of both discovery requests to which this notice relates are appended hereto. FPL requests confidential handling of all materials furnished to Staff in response to these discovery requests pursuant to Rule 25-22.006(3)(a).


Matthew M. Childs, P.A.
Steel Hector & Davis
215 South Monroe Street
Suite 601
Tallahassee, FL 32301
Attorneys for Florida Power
& Light Company

DOCUMENT NUMBER-DATE

07133 JUL 26 95

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
DOCKET NO. 950001-EI**

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Notice of Intent to Request Confidential Classification has been furnished by Hand Delivery** or U.S. Mail this 26th day of July, 1995, to the following:

Vicki D. Johnson, Esq.**
Division of Legal Services
FPSC
2540 Shumard Oak Blvd. Rm.370
Tallahassee, FL 32399-0850

Joseph A. McGlothlin, Esq.
Vicki Gordon Kaufman, Esq.
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
Tallahassee, FL 32301

G. Edison Holland, Esq.
Jeffrey A. Stone, Esq.
Beggs and Lane
P. O. Box 12950
Pensacola, FL 32576

Floyd R. Self, Esq.
Messer, Vickers, Caparello,
Madsen, Lewis, Goldman &
Metz, P.A.
P. O. Box 1876
Tallahassee, FL 32302-1876

Richard A. Zambo, P.A.
598 S.W. Hidden River Ave.
Palm City, FL 34990

Peter J.P. Brickfield, Esq.
Brickfield, Burchette
& Ritts, P.C.
1025 Thomas Jefferson St.N.W.
Eighth Floor, West Tower
Washington, D.C. 20007

John W. McWhirter, Jr., Esq.
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
Post Office Box 3350
Tampa, Florida 33601-3350

John Roger Howe, Esq.
Office of Public Counsel
111 West Madison Street
Room 812
Tallahassee, FL 32399


Lee L. Willis, Esq.
James D. Beasley, Esq.
Macfarlane Ausley Ferguson
& McMullen
P. O. Box 391
Tallahassee, FL 32302

James A. McGee, Esq.
Florida Power Corporation
P. O. Box 14042
St. Petersburg, FL 33733

Prentice P. Pruitt, Esq.**
Legal Services
FPSC
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Richard J. Salem, Esquire
Marian B. Rush, Esquire
Salem, Saxon & Nielsen
101 East Kennedy Blvd.
Suite 3200
One Barnett Plaza
Post Office Box 3399
Tampa, Florida 33601

Stephen R. Yurek, Esquire
Dahlen, Berg & Co.
2150 Dain Bosworth Plaza
60 South Sixth Street #2150
Minneapolis, MN 55402


Matthew M. Childs, P.A.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power) DOCKET NO. 950001-EI
Cost Recovery Clause and)
Generating Performance Incentive) DATE: July 14, 1995
Factor.)
_____)

STAFF'S SECOND SET OF INTERROGATORIES TO
FLORIDA POWER & LIGHT COMPANY (NOS. 10 - 14)

DUPLICATE

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, propounds Staff's Second Set of Interrogatories (Nos. 10 through 14), to Florida Power & Light Company (FPL or Company) pursuant to Rule 1.340, Florida Rules of Civil Procedure. These interrogatories shall be answered under oath by you or through your agent who is qualified to answer and who shall be fully identified, with said answers being served as provided pursuant to the Rules of Civil Procedure.

Provide the name, address and relationship to the Company of each person providing answers to the following inquiries and identify which question(s) each person answered.

RECEIVED

JUL 17 1995

STEEL HECTOR & DAVIS

INTERROGATORIES

10. Please provide a tabulation of the proposals received by FPL in response to the bid solicitation for the acquisition of rail cars. For each proposal provide the following:
- a. company name
 - b. summary of proposal (buy/lease, quantity, capacity, ...)
 - c. delivery schedule
 - d. total cost
 - e. method of payment
 - f. benefits of proposal
 - g. drawbacks of proposal
 - h. relative ranking of proposal
 - i. itemized annual revenue requirements analysis
 - j. economic assumptions

STAFF'S SECOND SET OF INTERROGATORIES TO FLORIDA POWER & LIGHT
COMPANY (NOS. 10 - 14)
DOCKET NO. 950001-EI

11. Will FPL receive a rail transportation price adjustment for using the aluminum rail cars for shipping coal to Plant Scherer? If yes, please provide the terms of the adjustment and the adjustment value (\$/ton) for each year from 1995 through 2016. Provide additional information if the price adjustment changes more frequently than annually.

STAFF'S SECOND SET OF INTERROGATORIES TO FLORIDA POWER & LIGHT
COMPANY (NOS. 10 - 14)
DOCKET NO. 950001-EI

12. Please provide the projected annual delivered quantities of coal to Plant Scherer from 1995 through 2016.

STAFF'S SECOND SET OF INTERROGATORIES TO FLORIDA POWER & LIGHT
COMPANY (NOS. 10 - 14)
DOCKET NO. 950001-EI

13. What type of rail cars were used to deliver Western PRB coal to Plant Scherer before the 462 high-capacity aluminum rail cars were purchased? Answer should only reflect deliveries since October 1993 and include discussion on the terms and conditions of displaced rail cars.

STAFF'S SECOND SET OF INTERROGATORIES TO FLORIDA POWER & LIGHT
COMPANY (NOS. 10 - 14)
DOCKET NO. 950001-EI

14. Please provide a summary of the contractual provisions between FPL and the Wyoming Powder River Basin coal supplier. The response should include, but not be limited to the following:
- a. supplier's name
 - b. source (mine name(s))
 - c. annual tonnages
 - d. quality specifications (%Sulfur, %Ash, Btu/Lb, ...)
 - e. term
 - f. reopeners



VICKI D. JOHNSON
Staff Counsel

Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
(904) 413-6199

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power) DOCKET NO. 950001-EI
Cost Recovery Clause and)
Generating Performance Incentive) FILED: July 14, 1995
Factor.)
_____)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of Staff's Second Set of Interrogatories (Nos. 10 through 14) has been furnished to Mr. Matthew Childs, Esquire, Steel Hector and Davis, 215 South Monroe Street, Suite 601, Tallahassee, Florida 32301, on behalf of Florida Power & Light Company, and that true and correct copies thereof have been furnished by U.S. Mail this 14th day of July, 1995, to the following:

Roger Yott
Air Products & Chemicals, Inc.
2 Windsor Plaza
2 Windsor Dr.
Allentown, PA 18195-1501

Vicki Kaufman
Florida Industrial Power
Users Group
c/o McWhirter Law Firm
315 S. Calhoun St., #716
Tallahassee, FL 32301-1838

Richard Salem
Salem Law Firm
101 E. Kennedy Blvd., #3200
Tampa, FL 33601

Bill Walker
Florida Power & Light Company
215 S. Monroe St., Suite 810
Tallahassee, FL 32301-1859

Peter Brickfield
Brickfield Law Firm
1025 Thomas Jefferson St. NW
West Tower, 8th Fl.
Washington, DC 20007

James A. McGee
Florida Power Corporation
P. O. Box 14042
St. Petersburg, FL 33733-4042

Suzanne Brownless
2546 Blainstone Pines Dr.
Tallahassee, FL 32301

Frank C. Cressman
Florida Public Utilities Company
P. O. Box 3395
West Palm Beach, FL 33402-3395

CERTIFICATE OF SERVICE
DOCKET NO. 950001-EI

Barry Huddleston
Destec Energy, Inc.
2500 CityWest Blvd., #150
Houston, TX 77210-4411

Jeffery Stone
Beggs & Lane Law Firm
P. O. Box 12950
Pensacola, FL 32576-2950

John McWhirter
McWhirter Law Firm (Tampa)
P. O. Box 3350
Tampa, FL 33601-3350

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

Office of Public Counsel
c/o The Florida Legislature
111 W. Madison St., #812
Tallahassee, FL 32399-1400

Florida Steel Corp. (Tpa)
1715 Cleveland St.
Tampa, FL 33606

Jack L. Haskins
Gulf Power Company
P. O. Box 13470
Pensacola, FL 32591-3470


Matthew Childs
Steel Law Firm
215 S. Monroe St., #601
Tallahassee, FL 32301

Jana A. Hathorne
Tampa Electric Company
Regulatory Affairs Department
P. O. Box 111
Tampa, FL 33601-0111

Eugene Trisko
United Mine Workers
P. O. Box 596
Berkeley Springs, WV 25411

Stephen Yurek
Dahlen Law Firm
2150 Dain Bosworth Plaza
60 S. 6th St.
Minneapolis, MN 55402

James Beasley
Macfarlane Ausley Ferguson
and McMullen
P. O. Box 391
Tallahassee, FL 32302



VICKI D. JOHNSON
Staff Counsel

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2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
(904) 413-6199

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power) DOCKET NO. 950001-EI
Cost Recovery Clause and)
Generating Performance Incentive) DATE: July 14, 1995
Factor.)
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DUPLICATE

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 (FPL).

Please produce the following documents at the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Gerald L. Gunter Building, Tallahassee, Florida, 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, 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.

RECEIVED

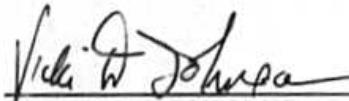
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STEEL HECTOR & DAVIS

STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA POWER
& LIGHT COMPANY (NOS. 1 - 2)
DOCKET NO. 950001-EI

1. Please provide a complete copy of the bid solicitation sent by FPL for the acquisition of rail cars for delivery of coal to Plant Scherer.

2. Please provide a copy of the contractual provisions that require FPL to supply rail cars in order for FPL to purchase and transport Powder River Basin coal from Wyoming, as referenced on page 8 of R. Silva's projection testimony.



VICKI D. JOHNSON
Staff Counsel

Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
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Salem Law Firm
101 E. Kennedy Blvd., #3200
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Bill Walker
Florida Power & Light Company
215 S. Monroe St., Suite 810
Tallahassee, FL 32301-1859

Peter Brickfield
Brickfield Law Firm
1025 Thomas Jefferson St. NW
West Tower, 8th Fl.
Washington, DC 20007

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Florida Power Corporation
P. O. Box 14042
St. Petersburg, FL 33733-4042

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2546 Blairstone Pines Dr.
Tallahassee, FL 32301

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McWhirter Law Firm (Tampa)
P. O. Box 3350
Tampa, FL 33601-3350

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Regulatory Affairs Department
P. O. Box 111
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Berkeley Springs, WV 25411

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