

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Adoption of Numeric Conservation Goals for Florida Power Corporation.

Docket No. 971005-EG
Filed: February 18, 1999

ORIGINAL

FLORIDA POWER CORPORATION'S OBJECTIONS TO LEAF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

Florida Power Corporation ("FPC") hereby submits its objections to LEAF's Second Request for Production of Documents to Florida Power Corporation and states as follows:

1. FPC objects to the following requests for production of documents on the grounds that they are not relevant to subject matter of this proceeding nor likely to lead to the discovery of admissible information.

Requests 5 (as it relates to interrogatory 15 b and d), 21, 22 and 24.

2. FPC objects to the following requests for production of documents on the grounds that they are unclear, overly broad and burdensome:

Interrogatories 8, 13, 14, 15, 16, 21 and 22.

Respectfully submitted,

OFFICE OF THE GENERAL COUNSEL
FLORIDA POWER CORPORATION

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- ACK _____
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- APP _____
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- LEG 1
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W. J. [Signature]
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING