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MAIL ROOM

September 7, 1999

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

In re: Generic investigation into the agregate electric utility reserve
margins planned for Peninsular Florida
Docket No. 981890-EU

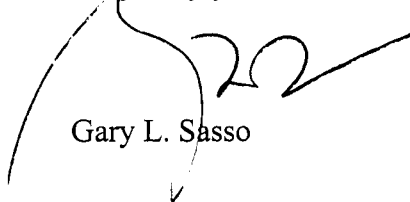
Dear Ms. Bayo:

Enclosed for filing in the above docket is the original and fifteen (15) copies of Florida
Power Corporation's Objections to LEAF's First Interrogatories and disc of the document.

We request you acknowledge receipt and filing of the above by stamping the additional
copy of this letter and returning it to me in the self-addressed, stamped envelope provided.

If you or your Staff have any questions regarding this filing, please contact me at (727)
821-7000.

Very truly yours,



Gary L. Sasso

- AFA 2
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG 1
- LEG 1
- MAS 5
- OPC GLS:jlc
- PAI 2
- SEC 1
- WAW _____
- OTH _____

Enclosures
cc: Counsel of Record

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DOCUMENT NUMBER-DATE

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ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic investigation)	
into the aggregate electric)	DOCKET NO. 981890-EU
utility reserve margins planned)	
for Peninsular Florida.)	Submitted for filing: September 7, 1999
_____)	

**FLORIDA POWER CORPORATION'S
OBJECTIONS TO LEAF'S FIRST INTERROGATORIES**

Florida Power Corporation (FPC) serves the following objections to Leaf's First Interrogatories to Florida Power Corporation (Nos. 1-12).

General Objections

This proceeding is an investigation, not an adjudication. While the Commission has the prerogative to request regulated companies to produce documents and other information pertinent to an investigation, third parties do not have that prerogative. The rules promulgated to implement Chapter 120, Fla. Stat., do not apply to a Commission investigation, as distinguished from an adjudication. Therefore, LEAF's interrogatories are not properly authorized, and FPC has no obligation to respond to them.

Nonetheless, without waiving this objection, and in a spirit of cooperation, FPC will agree to provide the requested information in 30 days (subject to particular objections and limitations indicated below), but FPC expressly reserves the right to object to any or all future discovery requests by LEAF or any other "party" to this investigation.

Specific Objections

FPC objects to Interrogatory No. 10 on the grounds that the information it seeks is confidential, proprietary, and irrelevant to the subject matter of this investigation.

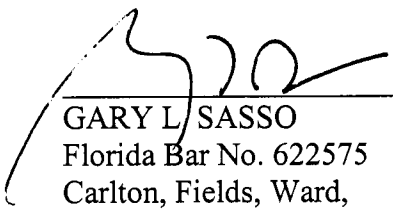
FPC objects to Interrogatory No. 11 on the ground that its sole relevance is to set up further, impermissible discovery.

FPC objects to Interrogatory No. 12 on the ground that its sole relevance is to set up further, impermissible discovery.

Respectfully submitted,

FLORIDA POWER CORPORATION

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing FLORIDA POWER CORPORATION'S OBJECTIONS TO LEAF'S FIRST INTERROGATORIES has been furnished via fax and U.S. Mail to Gail Kamaras as counsel for Legal Environmental Assistance Foundation, Inc., by U.S. Mail to all other counsel of record listed below this 7th day of September, 1999.

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