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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Determination of Need for an Electrical Power Plant in Okeechobee County by Okeechobee Generating Company, L.L.C.) DOCKET NO. 99-1462-EU) REPORTING) FILED: OCTOBER 29, 1999

OKEECHOBEE GENERATING COMPANY'S OBJECTIONS TO FLORIDA POWER CORPORATION'S FIRST SET OF INTERROGATORIES TO PETITIONER

Okeechobee Generating Company, L.L.C. ("OGC"), pursuant to the Order Establishing Procedure issued in this docket on October 13, 1999, hereby respectfully submits its objections to Florida Power Corporation's ("FPC") First Set of Interrogatories to Petitioner, which were served on OGC on October 19, 1999.

GENERAL OBJECTIONS

OGC objects to FPC's First Set of Interrogatories on the grounds set forth in paragraphs A-F below. Each of OGC's responses will be subject to and qualified by these general objections.

A. FPC is not a party to this proceeding. Accordingly, OGC objects to FPC's First Set of Interrogatories in their entirety. Rule 1.340, Florida Rules of Civil Procedure ("FRCP"), which is made specifically applicable to this proceeding by Uniform Rule 28-

AFA 106.206, Florida Administrative Code, authorizes only parties to APP propound discovery. If FPC is made a party to this proceeding, OGC CAF will respond as set forth in General Objection C. CMU CTR EAG 1/26 LEG 2 MAS 3 OPC PAI SEC 1 WAW OTH

B. OGC objects to the "Definitions" included in FPC's First Set of Interrogatories to the extent that they purport to impose upon OGC obligations that OGC does not have under the law that FPC

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invokes. Specifically, OGC objects to the definition of "you" or "your" to include PG&E Generating Company, L.L.C., and/or PG&E Corporation, including any subsidiaries, affiliates, and divisions or departments of same. PG&E Generating Company, L.L.C., and PG&E Corporation are not parties to this proceeding and are under no obligation to respond to FPC's First Set of Interrogatories.

C. OGC objects to FPC's request that the answers to these interrogatories be provided on or before October 29, 1999. Rule 1.340, FRCP, requires that answers to interrogatories shall be served within 30 days of service of the interrogatories. However, in an effort to be reasonable and to accommodate the orderly progress of this proceeding, OGC stated in its Response and Memorandum of Law in Opposition to FPC's Motion to Expedite Discovery and Motion for Alternate Expedited Discovery Schedule, filed with the Commission on October 26, 1999, that OGC will agree to respond to FPC's discovery requests as follows. OGC will respond within 20 days of service if FPC has been granted party status within such 20-day period, and, if FPC has not been granted party status within 20 days following service of its discovery requests, OGC will respond within two working days of receipt of notice that FPC has been granted party status.

D. OGC objects to any interrogatory that calls for the creation of information as opposed to the reporting of presently existing information as an improper expansion of OGC's obligations

under the law FPC invokes.

E. OGC objects to any interrogatory that calls for information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time response is first made to these interrogatories or is later determined to be applicable for any reason. OGC in no way intends to waive any such privilege or protection.

F. OGC objects to any interrogatory that calls for confidential proprietary business information and/or the compilation of information that is considered confidential proprietary business information.

SPECIFIC OBJECTIONS

OGC makes the following specific objections to FPC's First Set of Interrogatories. OGC's specific objections are numbered to correspond with the number of FPC's interrogatories.

2. OGC objects to this interrogatory on the grounds that it is vague. The term "economic risks" is not defined and OGC is unclear as to what it means. For example, economic risk could refer to risk to ratepayers, risk to OGC or risk to other utilities.

7. OGC objects to this interrogatory to the extent that it seeks confidential, proprietary business information. OGC also objects to this interrogatory in its entirety because it seeks

information protected by the attorney-client privilege and the work-product doctrine.

Respectfully submitted this 29th day of October, 1999.



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CERTIFICATE OF SERVICE
DOCKET NO. 991462-EU

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by hand delivery (*), facsimile transmission (**), or by United States Mail, postage prepaid, on the following individuals this 29th day of October, 1999.

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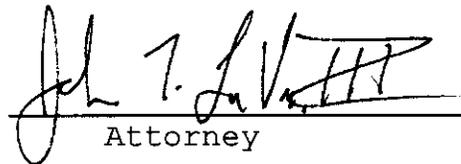
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