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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In Re: Petition for Determination of)
 Need for an Electrical Power Plant in) DOCKET NO. 99-1462-EU
 Okeechobee County by Okeechobee) REPORTING
 Generating Company, L.L.C.) FILED: November 22, 1999

OKEECHOBEE GENERATING COMPANY'S OBJECTIONS
TO FLORIDA POWER & LIGHT COMPANY'S THIRD REQUEST
FOR PRODUCTION OF DOCUMENTS (NOS. 61-67)

Okeechobee Generating Company, L.L.C. ("OGC"), pursuant to the Order Establishing Procedure, as revised, and the Order Establishing Expedited Discovery Schedule, hereby respectfully submits its objections to Florida Power & Light Company's ("FPL") Third Request for Production of Documents (Nos. 61-67) which were served on OGC on November 12, 1999.

GENERAL OBJECTIONS

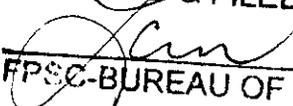
OGC objects to FPL's Third Request for Production of Documents on the grounds set forth in paragraphs A-D below. Each of OGC's responses will be subject to and qualified by these general objections.

A. OGC objects to FPL's demand that the documents be produced no later than November 28, 1999 (a Sunday). Pursuant to the Order Establishing Expedited Discovery Schedule issued on November 8, 1999,

OGC's responses to FPL's Third Request for Production of Documents are due on November 29, 1999.

B. OGC objects to any request for production of documents that calls for documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade

- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- MAS _____
- OPC _____
- PAI _____
- SEC _____
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- OTH _____

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DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

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 requests to produce or is later determined to be applicable for any reason. OGC in no way intends to waive any such privilege or protection.

C. OGC objects to any request that seeks the production of documents containing confidential, proprietary business information and/or the compilation of information that is considered confidential, proprietary business information.

D. OGC objects to any request that requires the production of "all" or "each" document as it cannot give assurances, even after a good faith and reasonably diligent attempt, that "all" or "each" responsive document will be found. Indeed, it may well be impossible to assure compliance with the exercise of reasonable diligence.

SPECIFIC OBJECTIONS

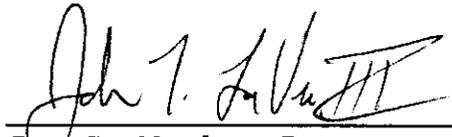
OGC makes the following specific objections to FPL's Third Request for Production of Documents. OGC's specific objections are numbered to correspond with the number of FPL's requests.

65. OGC objects to this request on the grounds that it seeks documents containing confidential, proprietary business information. OGC will attempt to respond to the extent possible with non-confidential, non-proprietary documents.

67. OGC objects to this request on the grounds that it requires

OGC to "[p]roduce all data, in columnar form . . ." OGC is only required to produce documents, in the form they are kept in the normal course of business. The applicable rules do not require OGC to compile new documents.

Respectfully submitted this 22nd day of November, 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 22nd day of November, 1999.

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