

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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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) FILED: FEBRUARY 4, 2000

OKEECHOBEE GENERATING COMPANY'S OBJECTIONS TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-4)

Okeechobee Generating Company, L.L.C. ("OGC"), pursuant to the Order Establishing Procedure issued in this docket hereby respectfully submits its objections to the Staff of the Florida Public Service Commission's ("Staff") First Request for Production of Documents to OGC (Nos. 1-4) ("Staff's First Requests to Produce").

GENERAL OBJECTIONS

OGC objects to Staff's First Requests to Produce on the grounds set forth in paragraphs A-B below. Each of OGC's responses will be subject to and qualified by these general objections.

A. OGC objects to any request that calls for documents 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.

B. OGC objects to any request that calls for documents containing confidential, proprietary business information and/or the compilation of information that is considered confidential,

Vertical list of initials: AFA, APP, CAF, CHU, CTR, EAG, LEG, MAS, OPC, PRR, SEC, WAW, OTH. Includes handwritten '4 staff' and '5'.

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proprietary business information.

SPECIFIC OBJECTIONS

OGC makes the following specific objections to Staff's First Requests to Produce. OGC's specific objections are numbered to correspond with the number of Staff's request.

1. OGC objects to this request to produce to the extent that it seeks documents containing confidential, proprietary business information. Certain reports or analyses prepared by investors' evaluation services or investment banking firms may contain information that is competitively sensitive, confidential, proprietary business information of OGC, its affiliates, or the investment companies, or of all affected entities. OGC will attempt to respond with non-confidential, non-proprietary public documents.

2. OGC objects to this request to produce to the extent that it seeks documents containing confidential, proprietary business information. Certain reports or analyses prepared by investors' evaluation services or investment banking firms may contain information that is competitively sensitive, confidential, proprietary business information of OGC, its affiliates, or the investment companies, or of all affected entities. OGC will attempt to respond with non-confidential, non-proprietary public documents.

3. OGC objects to this request to produce to the extent that it seeks documents containing confidential, proprietary business information. Certain reports or analyses prepared by investors'

evaluation services or investment banking firms may contain information that is competitively sensitive, confidential, proprietary business information of OGC, its affiliates, or the investment companies, or of all affected entities. OGC will attempt to respond with non-confidential, non-proprietary public documents.

4. OGC objects to this request to produce to the extent that it seeks documents containing confidential, proprietary business information. Certain reports or analyses prepared by investors' evaluation services or investment banking firms may contain information that is competitively sensitive, confidential, proprietary business information of OGC, its affiliates, or the investment companies, or of all affected entities. OGC will attempt to respond with non-confidential, non-proprietary public documents.

Respectfully submitted this 4th day of February, 2000.



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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 (*), or by United States Mail, postage prepaid, on the following individuals this 4th day of February, 2000.

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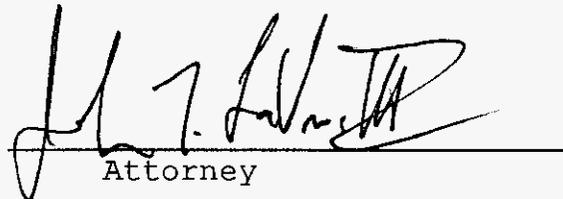
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