

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In Re: Petition for Determination of)
Need for an Electrical Power Plant in) DOCKET NO. 99-1462-EU
Okeechobee County by Okeechobee)
Generating Company, L.L.C.) FILED: FEBRUARY 22 2000

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OKEECHOBEE GENERATING COMPANY'S OBJECTIONS
TO FLORIDA POWER & LIGHT COMPANY'S FOURTH REQUEST
FOR PRODUCTION OF DOCUMENTS (NO. 68)

Okeechobee Generating Company, L.L.C. ("OGC"), pursuant to the Order Establishing Procedure, as revised, hereby respectfully submits its objections to Florida Power & Light Company's ("FPL") Fourth Request for Production of Documents (No. 68) which were served on OGC on February 16, 2000.

GENERAL OBJECTIONS

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

A. OGC objects to this request to produce to the extent it 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 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.

B. OGC objects to this request to produce to the extent it seeks the production of documents containing confidential, proprietary

- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG Nett
- LEG 2
- MAG S
- OPC _____
- RRR _____
- SEC 1
- WAV _____
- OTH _____

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business information and/or the compilation of information that is considered confidential, proprietary business information.

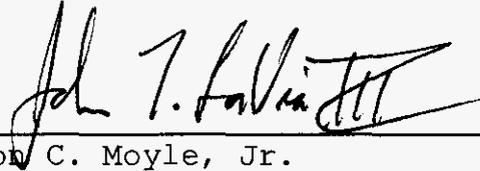
C. OGC objects to this request to produce to the extent that it requires the production of "all" or "each" document as it cannot give assurances, even after a good faith and reasonably diligent attempt, that "all" or "each" responsive document will be found. Indeed, it may well be impossible to assure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

SPECIFIC OBJECTIONS

OGC makes the following specific objection to FPL's Fourth Request for Production of Documents. OGC's specific objection is numbered to correspond with the number of FPL's request.

68. OGC objects to this request on the grounds that it seeks documents protected by the attorney-client privilege and the work product doctrine. OGC will attempt to respond to the extent possible with non-privileged documents.

Respectfully submitted this 22nd 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 22nd day of February, 2000.

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