

Law Offices

HOLLAND & KNIGHT LLP

315 South Calhoun Street
Suite 600
P.O. Drawer 810 (ZIP 32302-0810)
Tallahassee, Florida 32301

850-224-7000
FAX 850-224-8832
www.hklaw.com

Atlanta	Northern Virginia
Boston	Orlando
Bradenton	Providence
Chicago	San Francisco
Fort Lauderdale	St. Petersburg
Jacksonville	Tallahassee
Lakeland	Tampa
Melbourne	Washington, D.C.
Mexico City	West Palm Beach
Miami	Representative Offices:
New York	Buenos Aires
	Tel Aviv

KAREN D. WALKER
850-425-5612

Internet Address:
kwalker@hklaw.com

June 2, 2000

VIA HAND DELIVERY

Blanca S. Bayo
Director, Division of Records & Reporting
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

ORIGINAL

**RECORDS AND
REPORTING**

00 JUN -2 PM 4: 26

RECEIVED-FPSC

Re: Complaint and petition by Lee County Electric Cooperative, Inc. for an investigation of the rate structure of Seminole Electric Cooperative, Inc., Docket No. 981827-EC

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of:

LCEC's Response to Seminole's Preliminary Objections To, and Requests for Clarification Of, LCEC's First Request for Production of Documents; and **06758-00 -**

LCEC's Response to Seminole's Preliminary Objections to LCEC's First Set of Interrogatories. **06759-00**

For our records, please acknowledge your receipt of this filing on the enclosed copy of this letter. Thank you for your consideration.

APP	_____
CAF	_____
CMP	_____
COM	<u>3</u>
CTR	_____
ECR	_____
LEG	<u>1</u>
OFC	_____
PAI	_____
RGO	_____
SEC	<u>1</u>
SER	_____
OTH	_____

RECEIVED
14
FPSC-BUREAU OF RECORDS

Sincerely,

HOLLAND & KNIGHT LLP



Karen D. Walker

Blanca Bayo
June 2, 2000
Page 2

KDW:kjg
Enclosure

cc: Richard Melson
William Cochran Keating
Robert A. Mora
Timothy Woodbury

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint and petition by)	
Lee County Electric Cooperative, Inc.)	Docket No. 981827-EC
For an investigation of the rate structure)	
of Seminole Electric Cooperative, Inc.)	
	/	

LCEC'S RESPONSE TO SEMINOLE'S PRELIMINARY OBJECTIONS TO, AND REQUESTS FOR CLARIFICATION OF, LCEC'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

LEE COUNTY ELECTRIC COOPERATIVE, INC. ("LCEC"), hereby responds to SEMINOLE ELECTRIC COOPERATIVE, INC.'S ("Seminole"'s) Preliminary Objections To, and Requests for Clarification Of, LCEC's First Request for Production of Documents.

1. LCEC accepts Seminole's interpretation of Request Nos. 1, 2, 6, and 7.

2. LCEC accepts Seminole's interpretation of Request No. 4.

3. LCEC clarifies Request Nos. 11, 12, 13 and 14 as follows:

11. All documents, including overhead slides, utilized for the March 13, 1999 Seminole Rate Committee meeting relating to Seminole's rates, rate structure, rate design, or plans to construct new electrical generating facilities or to modify existing electrical generating units.

12. All documents, including overhead slides, utilized for the April 9, 1998 Seminole Rate Committee meeting relating to Seminole's rates, rate structure, rate design, or plans to construct new electrical generating facilities or to modify existing electrical generating units.

13. All documents, including overhead slides, utilized for the May 13, 1998 Seminole Rate Committee meeting relating to Seminole's rates, rate structure, rate design or plans to construct new electrical generating facilities or to modify existing electrical generating units.

242

DOCUMENT NUMBER-DATE

06758 JUN-28

FPSC-RECORDS/REPORTING

14. All documents, including overhead slides, utilized for the May 14, 1998 Seminole Board of Directors meeting relating to Seminole's rates, rate structure, rate design or plans to construct new electrical generating facilities or to modify existing electrical generating units.
4. LCEC does not accept Seminole's interpretation of Request No. 15.
5. LCEC clarifies Request No. 16 as follows:
 16. All documents showing the capacity of Seminole's power supply resources or power purchase resources for the years 1999 through 2009.
6. LCEC clarifies Request Nos. 20, 22 and 23 as follows:
 20. Minutes and all meeting notes from each Board of Directors meeting, Rate Committee meeting, or Rate Design Workshop conducted by Seminole during 1998, 1999 and 2000 relating to Seminole's rates, rate structure, rate design or plans to construct new electrical generating facilities or to modify existing electrical generating units.
 22. All documents provided to members of Seminole's Board of Directors during any Board of Directors meeting, Rate Committee meeting, or Rate Design workshop conducted by Seminole during 1998, 1999 and 2000 relating to Seminole's rates, rate structure, rate design or plans to construct new electrical generating facilities or to modify existing electrical generating units.
 23. Copies of all slides or other visual aids used during any Board of Directors meeting, Rate Committee meeting, or Rate Design workshop conducted by Seminole during 1998, 1999 and 2000 relating to Seminole's rates, rate structure, rate design or plans to construct new electrical generating facilities or to modify existing electrical generating units.
7. LCEC accepts Seminole's interpretation of Request No. 25. LCEC further limits Request No. 25 to those documents in existence since the inception of load management by Seminole.
8. LCEC clarifies Request No. 26 as follows:

26. All documents relating to Seminole's current or future plans to construct new electrical generating facilities or to modify existing electrical generating units.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by hand delivery to Richard Melson, Hopping, Green, Sams & Smith, P.A., Post Office Box 6526, Tallahassee, Florida; William Cochran Keating, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850; and by United States Mail to Robert A. Mora, Allen Law Firm, Post Office Box 2111, Tampa, Florida 33601; and Timothy Woodbury, Seminole Electric Cooperative, Inc., Post Office Box 272000, Tampa, Florida 33688-2000 all on this 2nd day of June, 2000.



D. Bruce May
Florida Bar No. 354473
Karen D. Walker
Florida Bar No. 0982921
Holland & Knight LLP
Post Office Drawer 810
Tallahassee, Florida 32302
(850) 224-7000