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February 22, 2002

FEDERAL EXPRESS

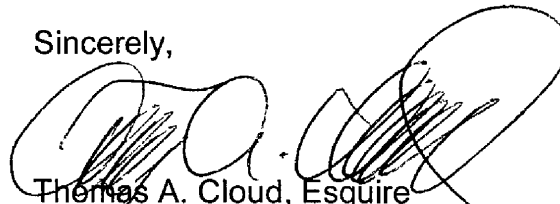
Blanca S. Bayó, Director
Division of Records and Reporting
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0870

Re: Docket No.: 001148-EI
Publix Super Markets, Inc., Notice of Service and Amendment to First
Request to Produce to Florida Power & Light Company (Nos. 1 - 21)

Dear Ms. Bayó:

Enclosed please find Publix Super Markets Inc., Notice of Service for the
Amendment to First Request to Produce (Nos. 1 - 21) served on Florida Power & Light
Company.

Sincerely,



Thomas A. Cloud, Esquire

GRAY, HARRIS & ROBINSON, P.A.

TAC:gcj
Enclosure
cc: All individuals on docketing service list

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FPSC-COMMISSION CLERK



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Review of the Retail Rates of FPL

DOCKET NO. 001148-EI

Submitted for Filing:
February 22, 2002

PUBLIX SUPER MARKETS, INC.'s AMENDMENT TO FIRST REQUEST TO PRODUCE TO FLORIDA POWER & LIGHT COMPANY (Nos. 1-21)

Pursuant to Fla. Admin. Code R. 28-106.206, and Fla. R. Civ. P. 1.350, Publix Super Markets, Inc. ("Publix"), by and through its undersigned counsel, amends and clarifies its First Request to Produce to Florida Power & Light Company, dated January 3, 2002 in response to Florida Power & Light Company's Objections to and Request For Clarification of Publix Super Markets, Inc's First Request to Produce (Nos. 1 – 21), dated January 14, 2002 and requests that the following documents be produced by Florida Power & Light Company for inspection and copying at the offices of Gray, Harris & Robinson, P.A. at 301 East Pine Street, Suite 1400, Orlando, Florida 32802, or at such other place as may be mutually agreed upon by counsel:

DEFINITIONS

1. The terms "document" or "documents" are meant to have the broadest possible meaning under applicable law and includes, but is not necessarily limited to, any written, recorded, filmed or graphic matter, whether produced, reproduced, or on paper, e-mail, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to memoranda, notes, minutes, records, photographs, correspondence, telegrams, diary's, bookkeeping entries, financial statements, tax returns,

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copies, subject matter of the document, and the basis upon which such privilege is claimed.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control, or reasonably availability to you.

3. If FPL has possession, custody or control of the originals of the documents requested, please produce the originals or a complete copy of the originals and all copies which are different in any way from the original, whether by interlineation, receipt stamp or notation. If FPL does not have possession, custody, or control of the originals of the documents requested please produce any copies in the possession, custody, or control, however made, of FPL.

4. The term "and" "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this production of documents any document which might otherwise be construed to be outside of the scope.

AMENDED REQUESTS FOR DOCUMENTS

Original Request Numbers 9(e) and (f):

9. With respect to MFR Schedule C-66 (Pension Cost), please provide the following information:

(e) MFR Schedule C-66 with the years 1999 and 2000 included; and,

(f) an electronic file of adjusted C-66 with all backup calculations.

Clarified and Amended Request Numbers 9(e) and (f):

9. With respect to MFR Schedule C-66 (Pension Cost), please provide the following information:

(e) MFR Schedule C-66 with the years 1999 and 2000 included and if MFR Schedule C-66 is not available with years 1999 and 2000, then provide the following information concerning Pension Cost for Historical Years 1999 and 2000:

- (i) Service Cost
- (ii) Interest Cost
- (iii) Return on Plan Assets for the year
- (iv) Amortization of Transition Obligation (Asset)
- (v) Amortization of Prior Service Cost (Credit)
- (vi) Amortization of Net Loss (Gain)
- (vii) Net Periodic Cost (Benefit)
- (viii) Percent of Pension Cost Capitalized
- (ix) Pension Cost Recorded in Account 926
- (x) Minimum Required Contribution Per IRS
- (xi) Minimum Allowable Contribution Per IRS
- (xii) Actual Contribution Made to the Trust Fund
- (xiii) Actuarial Attribution Approach Used for Funding
- (xiv) Assumed Discount Rate Used for Computing Funding
- (xv) Allocation Method Used to Assign Costs if the Utility is Not the Sole
- (xvi) Participant in the Plan Attach the Relevant Procedures.
- (xvii) Accumulated Benefit Obligation at year end
- (xviii) Projected Benefit Obligation at year end

- (xix) Vested Benefit Obligation at year end
 - (xx) Assumed Discount Rate (Settlement Rate)
 - (xxi) Assumed Rate for Salary Increases
 - (xxii) Fair Value of Plan Assets
 - (xxiii) Market Related Value of Plan Assets at year end
 - (xxiv) Balance in Working Capital in Account 186 at year end, and,
- (f) an electronic file of MFR Schedule C-66 with all backup calculations.

Original Request Number 10(e):

10. With respect to the footnote on page 1 of 3 on MFR Schedule C-4 Attachment 1 to Schedule C-3 (Commission Net Operating Income Adjustments):

- (e) Provide all documents detailing expenditures on security measures due to recent world events.

Clarified and Amended Request Number 10(e):

10. With respect to the footnote on page 1 of 3 on MFR Schedule C-4 Attachment 1 to Schedule C-3 (Commission Net Operating Income Adjustments):

- (e) Provide documents detailing the cost breakdown of expenditures, by generalized categories, made by FPL on security measures due to recent world events. By way of example, a breakdown indicating costs for the purchase of new security equipment, hiring of additional security personnel, security analysis or audit, security

consultant costs, and similar general categories would be acceptable to Publix.

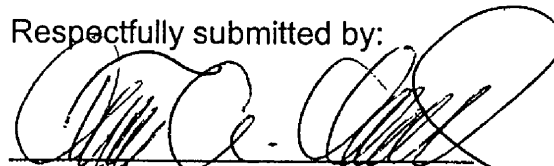
Original Request Number 19:

19. Please provide any documents related to the purchase or sale of any FPL assets (including any plants, transmission and distribution facilities, business or business facilities, subsidiaries or assets of subsidiaries) within the last 5 years. These should include partial purchases and sales as well.

Clarified and Amended Request Number 19:

19. Please provide any documents related to the purchase or sale of any FPL assets (including any plants, transmission and distribution facilities, business or business facilities, subsidiaries or assets of subsidiaries) valued in excess of \$1,000,000 individually or in the aggregate, within the last 5 years. These should include partial purchases and sales as well.

Respectfully submitted by:



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Attorneys for Publix Super Markets, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Facsimile and/or Federal Express to the following parties of record and interested parties, this 22nd day of February, 2002:

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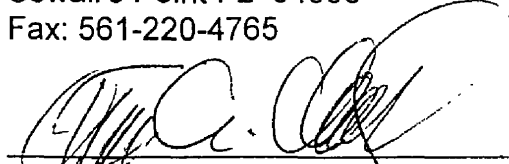
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Review of the Retail Rates of FPL

DOCKET NO. 001148-EI

Submitted for Filing:
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NOTICE OF SERVICE

Pursuant to Fla. Admin. Code R. 28-106.206, Publix Super Markets, Inc., by and through its undersigned counsel serve this notice that it has served its Amendment to its First Set of Request to Produce to Florida Power & Light Company (Nos. 1-21).

Respectfully submitted,



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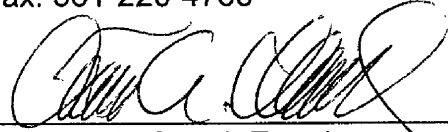
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