

ORIGINAL

**MCWHIRTER REEVES**  
ATTORNEYS AT LAW

TAMPA OFFICE:  
400 NORTH TAMPA STREET, SUITE 2450  
TAMPA, FLORIDA 33602  
P. O. BOX 3350 TAMPA, FL 33601-3350  
(813) 224-0866 (813) 221-1854 FAX

PLEASE REPLY TO:  
  
TALLAHASSEE

TALLAHASSEE OFFICE:  
117 SOUTH GADSDEN  
TALLAHASSEE, FLORIDA 32301  
(850) 222-2525  
(850) 222-5606 FAX

April 19, 2002

**VIA HAND DELIVERY**

Blanca S. Bayo, Director  
Division of Records and Reporting  
Betty Easley Conference Center  
4075 Esplanade Way  
Tallahassee, Florida 32399-0870

APR 19 PM 4:38  
COMMISSION  
CLERK  
RECEIVED

Re: Docket No.: 020262 and 020263

Dear Ms. Bayo:

On behalf of Reliant Energy Power Generation, Inc., enclosed for filing and distribution are the original and 1 copy of the following:

- ▶ Notice of Service of Reliant Energy Power Generation, Inc.'s Notice of Service of Third Set of Interrogatories (Nos. 51-74) and Third Request for Production of Documents (Nos. 19-21) to Florida Power and Light Company, Inc.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copies to me. Thank you for your assistance.

US	_____
AF	_____
MP	_____
OM	_____
TR	_____
CR	_____
CL	_____
PC	_____
IMS	_____
EC	_____
TH	_____

Sincerely,

*Joe Allen McGlothlin*

Joseph A. McGlothlin

Teach JAM/mls  
No. in Enclosure  
Filing

RECEIVED & FILED  
*Attockand*  
FPSC-BUREAU OF RECORDS

MCWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, DECKER, KAUFMAN, ARNOLD & STEEN, P.A.

DOCUMENT NUMBER - DATE  
04373 APR 19 02  
FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Florida Power and Light  
Company for a Determination of Need  
For a power plant proposed to be located  
In Martin County

Docket No. 020262

In re: Petition of Florida Power and Light  
Company for a Determination of Need  
For a power plant proposed to be located  
In Manatee County

Docket No. 020263

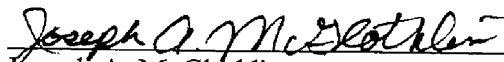
Filed: April 19, 2002

---

**RELIANT ENERGY POWER GENERATION, INC.'S NOTICE  
OF SERVICE OF THIRD SET OF INTERROGATORIES (Nos. 51-74)  
AND SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 19-21)  
TO FLORIDA POWER AND LIGHT COMPANY**

Please Take Notice that on this date, Reliant Energy Power Generation, Inc., served via Hand Delivery to Martha Brown, Florida Public Service Commission, Division of Legal Services, Gerald L. Gunter Building, 2540 Shumard Oak Blvd, Tallahassee, Florida 32399-0850 and to Charles A. Guyton, Steel, Hector & Davis, 215 South Monroe Street, Tallahassee, Florida 32301, Reliant Energy Power Generation, Inc.'s Third Set of Interrogatories (Nos. 51-74) and Third Request for Production of Documents (Nos. 19-21) to Florida Power & Light Company. Copies of both documents are being served upon all other parties of record.

Dated this 19th day of April 2002.



Joseph A. McGlothlin  
McWhirter, Reeves, McGlothlin, Davidson, Decker,  
Kaufman, Arnold & Steen, P.A.  
117 South Gadsden Street  
Tallahassee, Florida 32301  
Telephone: (850) 222-2525  
Facsimile: (850) 222-5606  
[jmcglothlin@mac-law.com](mailto:jmcglothlin@mac-law.com)

Michael G. Briggs  
Reliant Energy, Inc.  
801 Pennsylvania Avenue, Suite 620  
Washington DC 20004  
Telephone: (202) 783-7220  
Facsimile: (202) 783-8127  
[mbriggs@reliant.com](mailto:mbriggs@reliant.com)

Attorneys for Reliant Energy Power Generation, Inc.

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Notice of Service of Reliant Energy Power Generation, Inc.'s Third Set of Interrogatories (Nos. 51-74) and Second Request for Production of Documents (Nos. 19-21) to Florida Power & Light Company, was on this 19th day of April 2002, served via (\*) Hand delivery and U.S. Mail to the following:

(\*)Mary Ann Helton  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

(\*) Martha Brown  
Florida Public Service Commission  
Division of Legal Services  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Jack Shreve  
Office of Public Counsel  
c/o Florida Legislature  
111 West Madison Street, Room No. 812  
Tallahassee, Florida 32301

(\*)Charles A. Guyton  
Steel, Hector & Davis  
215 S. Monroe Street  
Tallahassee, Florida 32301

Bill Walker  
215 S. Monroe Street, Suite 810  
Tallahassee, Florida 32301

Suzanne Brownless  
Suzanne Brownless, PA  
1311-B Paul Russell Road, Suite 4e 201  
Tallahassee, FL 32301

  
Joseph A. McGlothlin