

ORIGINAL

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May 1, 2002

Ms. Blanca S. Bayó, Director
Division of Commission Clerk and
Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Via Hand Delivery

Re: **CONFIDENTIAL DOCUMENT FILING**
Docket Nos. 020262-EI, 020263-EI

Dear Ms. Bayó:

Enclosed for filing on behalf of Florida Power & Light Company ("FPL") are the original and fifteen copies of a Notice of Intent to Request Confidential Classification, together with a diskette containing the electronic version of same. The Notice of Intent pertains to certain documents responsive to Staff's First Set of Interrogatories to FPL in Docket Nos. 020262-EI, 020263-EI. Exhibit A to the Notice are copies of these discovery requests.

Please note that Exhibit B of FPL's Notice of Intent to Request Confidential Classification contains information which is **CONFIDENTIAL**. Exhibit B consists of paper copies of attachments to FPL's response to Interrogatory No. 23 and FPL's responses to Interrogatories Nos. 40 - 43. To facilitate the confidential handling of this confidential information, we have labeled it **CONFIDENTIAL** and enclosed it in a separate envelope labeled "**Exhibit B CONFIDENTIAL**".

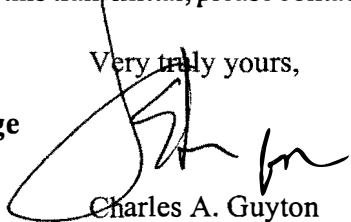
Copies of the Notice of Intent without Exhibit B have been served upon the Division of Legal Services and all parties of record.

If you or your staff have any questions regarding this transmittal, please contact me at 222-2300.

- AUS _____
- CAF _____
- CMP _____
- COM _____
- CTR _____
- ECR _____
- GCL _____
- OPC _____
- MMS _____
- SEC _____
- OTH _____

This docketed notice of intent was filed with Confidential Document No. 04749-02. The document has been placed in confidential storage pending timely receipt of a request for confidentiality.

Very truly yours,



Charles A. Guyton

Enclosure
cc: Martha Carter Brown
Counsel for Parties of Record

DOCUMENT NUMBER-DATE

04748 MAY-1 2002

Miami West Palm Beach Tallahassee Naples Key West London Caracas São Paulo Rio de Janeiro Santo Domingo

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Florida Power & Light)
Company for a determination of need for)
a power plant proposed to be located)
in Martin County)
_____)

Docket No. 020262-EI

In re: Petition of Florida Power & Light)
Company for a determination of need for)
a power plant proposed to be located)
in Manatee County)
_____)

Docket No. 020263-EI

Dated: May 1, 2002

NOTICE OF INTENT TO REQUEST
CONFIDENTIAL CLASSIFICATION

Pursuant to Florida Administrative Code Rule 25-22.006(3)(a), Florida Power & Light Company ("FPL") files this Notice of Intent to Request Confidential Classification ("Notice"). This Notice relates to FPL's responses to Interrogatories Nos. 40 - 43 and the attachment to FPL's response to Interrogatory No. 23 to Staff's First Set of Interrogatories. A copy of Staff's discovery requests giving rise to these responses is appended hereto as Exhibit A. A copy of FPL's confidential responses to these requests is enclosed in the envelope labeled "**Exhibit B CONFIDENTIAL INFORMATION.**" FPL, pursuant to Rule 25-22.006(3)(a), requests confidential handling of all materials furnished in response to these Staff discovery requests.

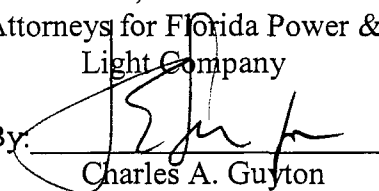
DOCUMENT NUMBER-DATE

04748 MAY-18

FPSC-COMMISSION CLERK

Respectfully submitted,
Steel Hector & Davis
215 S. Monroe St., Suite 601
Tallahassee, Florida 32301
Attorneys for Florida Power &
Light Company

By:



Charles A. Guyton

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Notice Of Intent To Request Confidential Classification, was served by Hand Delivery this 1st day of May, 2002 to the following:

Martha Carter Brown, Esq.
Lawrence Harris, Esq.
Legal Division
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Robert Scheffel Wright, Esq.
Diane K. Kiesling, Esq.
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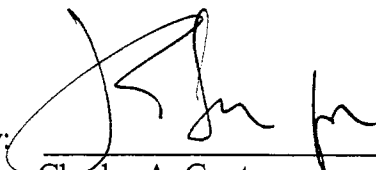
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By: 
Charles A. Guyton

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to determine need for an electrical power plant in Martin County by Florida Power & Light Company.

DOCKET NO. 020262-EI

In re: Petition to determine need for an electrical power plant in Manatee County by Florida Power & Light Company.

DOCKET NO. 020263-EI

DATED: April 1, 2002

STAFF'S FIRST SET OF INTERROGATORIES TO
FLORIDA POWER AND LIGHT COMPANY (NOS. 1 - 38)

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, propounds the following interrogatories, pursuant to Rule 1.340, Florida Rules of Civil Procedure, to Florida Power and Light Company. These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served as provided by the Rules of Civil Procedure. As provided by Rule 1.340(a), Florida Rules of Civil Procedure, each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it, and delivered to the staff no later than 24 days after service of this request.

Give the name, address and relationship to Florida Power and Light Company of those persons providing the answers to each of the following interrogatories.

COMMISSION'S FIRST SET OF INTERROGATORIES TO
FLORIDA POWER AND LIGHT COMPANY (NOS. 1 - 3B)
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If an interrogatory contained herein asks for information that has already been provided or is in the process of being provided to the Commission through a Commission audit, please so state, indicating the date provided and the audit document/record request number.

INTERROGATORIES

1. Please provide a schedule which shows the actual common equity ratio for FPL Group, Inc. and each of its subsidiaries for fiscal years 1999, 2000, and 2001. For purposes of this response, the actual equity ratio is calculated by dividing total common equity by the sum of total common equity, preferred stock, long-term debt, and short-term debt. Show all amounts used in the calculations. Sum of the total equity for the subsidiaries should reconcile with the total equity for FPL Group, Inc.

2. For the years 1999, 2000, and 2001, what was the adjusted equity ratio for Florida Power and Light Company and Florida Power and Light Group on a consolidated basis. For purposes of this response, the adjusted equity ratio is calculated by dividing total common equity by the sum of total common equity, preferred stock, long-term debt, short-term debt, and an estimate of its off-balance sheet debt equivalent. Show all amounts used in the calculations.

COMMISSION'S FIRST SET OF INTERROGATORIES TO
FLORIDA POWER AND LIGHT COMPANY (NOS. 1 - 38)
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3. For the years 1999, 2000, and 2001, please provide schedules which show the estimated amount of the off-balance sheet debt equivalent for Florida Power and Light Company. For purposes of this response, these schedules should itemize the projected capacity payment stream for each of the Company's primary purchased power contracts (smaller QF contracts may be lumped together), the discounted present value amount at a 10% discount rate, the respective Standard & Poor's risk adjustment factors, the adjusted debt equivalent value of each contract, and the total amount of Florida Power and Light Company's estimate of its off-balance sheet debt equivalent for each year.

4. Please discuss in detail the reasonableness of the financial assumptions relied upon in Florida Power and Light Company's need determination filing.

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5. Please discuss in detail the reasonableness of the tax positions Florida Power and Light Company has assumed in its need determination filing.

6. Who will be the natural gas supplier for the projects?

7. Do you have any signed contracts for the supply of natural gas at this time?

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8. If not, when do you expect to have them?

9. What are the contracted volumes of natural gas to serve the projects?

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10. What is the capacity of the pipeline that will serve the projects?

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11. What is the anticipated in service date for the natural gas supply for the projects?

12. Should the Commission use the results of Florida Power and Light Company's Request for Proposals (RFP) to evaluate the prudence of the Manatee expansion and Martin repowering at this time?

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13. Provide a Present Worth Revenue Requirements (PWRR) analysis for each expansion plan evaluated in Florida Power and Light Company's RFP process. Include separate PWRR analyses for each plan resulting from the self-build options selected from the RFP process, the self-build options contained in the RFP, and all respondents to the RFP. For each year in the evaluation period, provide the annual and cumulative PWRR for each of the following components: generation capital, generation fixed O&M, generation non-fuel variable O&M, transmission capital, transmission fixed O&M, transmission non-fuel variable O&M, system fuel, purchased power, and total costs.

14. Provide a side-by-side annual comparison, listing megawatts, unit, and reserve margin, of the expansion plan resulting from the self-build options selected from Florida Power and Light Company's RFP process, the expansion plan resulting from the self-build options identified in the RFP, and the expansion plans resulting from each RFP respondent's proposal. The time period should be identical to the PWRR analysis requested in interrogatory two.

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15. Explain in detail how those RFP responses which included power purchases of shorter term than the depreciable life of the selected self-build options, were evaluated on a comparable basis with Florida Power and Light Company's self-build options.

16. Explain in detail how the cost of existing land and infrastructure was incorporated into Florida Power and Light Company's self-build options selected from the RFP process, the self-build options contained in the RFP, and all respondents to the RFP.

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17. Describe the transmission upgrades necessary for Florida Power and Light Company's self-build options selected from the RFP process, the self-build options contained in the RFP, and all respondents to the RFP. Also include how these upgrades were developed and a list of the staff involved.

18. Provide a breakdown of all transmission-related costs associated with Florida Power and Light Company's self-build options selected from the RFP process, the self-build options contained in the RFP, and all respondents to the RFP.

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19. Explain in detail how Florida Power and Light Company incorporated the cost of emission credits associated with the self-build options selected from the RFP process, the self-build options contained in the RFP, and all respondents to the RFP.

20. Discuss whether Florida Power and Light Company's August 13, 2001 RFP permitted a respondent to construct an electric generating unit on property owned by Florida Power and Light Company. If so, provide a brief description of any such proposal including a discussion of how it was evaluated.

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21. Provide a time line with milestones for Florida Power and Light Company's 2001 generation planning activities.

○ 22. Page 12 of Florida Power and Light Company's August 13, 2001 RFP contains a proposed schedule of events. Provide the actual dates on which these events occurred, explaining any differences from the schedule in the RFP.

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23. Provide an overview of how the results of the RFP evaluation process were presented to Florida Power and Light Company management for approval. This overview should include dates, attendance lists, and minutes of any meetings or presentations.

○ 24. Provide an overview of how the decision to pursue construction at the Manatee site was presented to Florida Power and Light Company management for approval. Include dates, attendance lists, and minutes of any meetings or presentations.

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25. Explain when Florida Power and Light Company identified the proposed expansion at the Manatee site as a self-build option.

○ 26. Explain when Florida Power and Light Company notified the respondents to its RFP that the proposed Manatee expansion was a self-build option.

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27. Provide a list of staff assigned to the evaluation of RFP respondents. Also include an organizational chart depicting where in the Florida Power and Light Company organization these individuals are assigned.

28. Page 135 of Florida Power and Light Company's 2001 Ten-Year Site Plan states that "The Midway facility has been selected as a preferred site due to a combination of electrical transmission and system load factors, plus economic considerations." Please explain in detail these factors and why they are not applicable today.

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29. Explain why the Manatee site has not appeared in past Florida Power and Light Company Ten-Year Site Plan filings as either a preferred or potential site.

30. Explain how the planned facility at the Midway site has been evaluated for transmission access along with other potential generation additions in the vicinity. Describe how Florida Power and Light Company's decision to change the proposed plant site from Midway to Manatee affects the Midway project's place in the queue for transmission interconnection/integration service.

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31. Provide a listing of all entities who requested transmission/integration service in response to Florida Power and Light Company's RFP. Include the date of initial request, the RFP respondent's location, and the capacity of the RFP respondent's proposed facility.

32. Discuss whether Florida Power and Light Company has submitted a request for transmission interconnection service for the proposed Manatee project. If so, provide the date of such request and the relative position in the queue with other generation interconnection requests.

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33. Discuss whether Florida Power and Light Company has submitted a request for transmission interconnection service for the proposed Midway project. If so, provide the date of such request and the relative position in the queue with other generation interconnection requests?

34. Provide a description of when Florida Power and Light Company began preparing the site certification application that was filed at the Department of Environmental Protection in early February. Include the date when the site certification application filing was approved by Florida Power and Light Company management, and the staff involved in preparing the filing.

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35. Explain how Florida Power and Light Company intends to pursue the renewable energy proposals received in response to the August 13, 2001 RFP.

*Dennis
Brandt*

36. Explain how conservation and demand-side management (DSM) savings are incorporated into Florida Power and Light Company's integrated resource plan. Specifically, are DSM savings included only up to the end of the current DSM goals period?

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37. Discuss why Florida Power and Light Company does not plan to have a backup fuel source for the self-build options selected from the RFP process. Explain how an interruption to the natural gas supply to these locations would impact electric system reliability in Florida Power and Light Company's service territory.

38. If Florida Power and Light Company were to have a backup fuel source for the self-build options selected from the RFP process, describe the type of fuel that would be chosen (commodity and storage), and the expected amount of backup fuel stored (number of days burn at 100% dispatch).

Martha Carter Brown
MARTHA CARTER BROWN
Senior Attorney
FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
(850) 413-6187

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to determine
need for an electrical power
plant in Martin County by
Florida Power & Light Company.

DOCKET NO. 020262-EI

In re: Petition to determine
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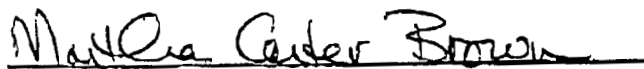
DOCKET NO. 020263-EI

DATED: April 1, 2002

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original and one copy of
COMMISSION'S FIRST SET OF INTERROGATORIES TO FLORIDA POWER AND
LIGHT COMPANY (NOS. 1 - 38) has been served by facsimile and U. S.
Mail to Mr. Charles A. Guyton, Esquire, Steel Hector & Davis, 215
S. Monroe Street, Suite 610, Tallahassee, FL 32301-1804, on behalf
of Florida Power and Light Company, and that a true and correct
copy thereof has been furnished by U. S. Mail this 1st of April,
2002 to the following:

Mr. Bill Walker
215 S. Monroe St., #810
Tallahassee, FL 32301-1859


MARTHA CARTER BROWN
Senior Attorney
FLORIDA PUBLIC SERVICE COMMISSION
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