

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: July 29, 2002

**FLORIDA POWER & LIGHT COMPANY'S
 OBJECTIONS TO AND REQUESTS FOR CLARIFICATION OF
 CPV GULFCOAST, LTD'S FIRST SET OF INTERROGATORIES (NOS. 1-19)**

Florida Power & Light Company ("FPL") hereby submits the following objections to and requests for clarification of CPV Gulfcoast, Ltd.'s ("CPV Gulfcoast's") First Set of Interrogatories (Nos. 1-19) ("CPV Gulfcoast's First Set").

I. Preliminary Nature of These Objections

The objections stated herein are preliminary in nature and are made at this time consistent with procedural Order PSC-02-0992-PCO-EI of the Florida Public Service Commission ("Commission"), which requires a respondent to raise objections or requests for clarification within ten days of receipt of discovery requests. Should additional grounds for objection be discovered as FPL develops its response, FPL reserves the right to supplement or modify its objections up to the time it serves its responses. Should FPL determine that a protective order is necessary regarding any of the requested information, FPL reserves the right to file a motion with the Commission seeking such an order at the time its response is due.

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II. General Objections

FPL objects to each and every one of the interrogatories that calls for information 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 or is later determined to be applicable for any reason. FPL in no way intends to waive such privilege or protection.

FPL objects to providing information that is proprietary, confidential business information without provisions in place to protect the confidentiality of the information. FPL has not had sufficient time to make a final determination of whether the discovery requests call for the disclosure of confidential information. However, if it determines that any of the discovery requests would require the disclosure of confidential information, FPL will either file a motion for protective order requesting confidential classification and procedures for protection or take other actions to protect the confidential information requested. FPL in no way intends to waive claims of confidentiality.

FPL is a large corporation with employees located in many different locations. In the course of its business, FPL creates numerous documents that are not subject to Commission's or other governmental record retention requirements. These documents are kept in numerous locations and frequently are moved from site to site as employees change jobs or as business is reorganized. Therefore, it is possible that not every relevant document may have been consulted in developing FPL's response. Rather, FPL's responses will provide all the information that FPL obtained after a reasonable and diligent search conducted in connection with this discovery

request. To the extent that the discovery requests propose to require more, FPL objects on the grounds that compliance would impose an undue burden or expense on FPL.

FPL objects to CPV Gulfcoast's First Set to the extent that it calls for the creation of information, rather than the reporting of presently existing information, as purporting to expand FPL's obligation under the law.

FPL objects to providing information to the extent that such information is already in the public record before the Florida Public Service Commission and available to CPV Gulfcoast through normal procedures.

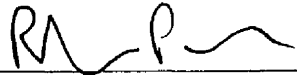
Numerous of the interrogatories are not expressly limited to data or analyses performed in connection with the evaluation of the Martin and Manatee projects that are the subjects of these dockets. FPL assumes that, unless expressly stated to the contrary, the interrogatories in CPV Gulfcoast's First Set are intended to refer to data or analyses related to those projects and objects to the extent that any such discovery requests are not so limited, on the grounds that they would be overly broad, irrelevant and burdensome.

FPL objects to any interrogatories that seek information about, or in the possession of, FPL's parent or affiliated companies.

Respectfully submitted,

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CERTIFICATE OF SERVICE
Docket Nos. 020262-EI and 020263-EI

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Objections to and Request for Clarification of CPV Cana's Second Request for Production of Documents (Nos. 19-55) has been furnished by e-mail (*) and United States Mail this 29th day of July, 2002 to the following:

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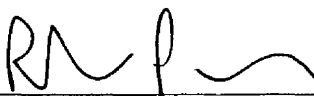
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