

ORIGINAL

RECEIVED
AUG-5 PM 4:24
COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition to Determine Need) Docket No. & 020262-EI
For an Electrical Power Plant in)
Martin County by Florida Power &)
Light Company.)

In re: Petition to Determine Need) Docket No. 020263-EI
For an Electrical Power Plant in)
Manatee County by Florida Power &)
Light Company.)
Filed August 5, 2002

**CALPINE ENERGY SERVICES, L.P.'S OBJECTIONS
TO FLORIDA POWER & LIGHT COMPANY'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-28)**

Intervenor, Calpine Energy Services, L.P. ("Calpine"), pursuant to the Commission's Order establishing procedure, issued on July 23, 2002, hereby respectfully submits its objections to Florida Power & Light Company's ("FPL") First Request for Production of Documents (Nos. 1-28), which were served on Calpine on July 26, 2002.

GENERAL OBJECTIONS

Calpine objects to FPL's First Request for Production of Documents on the grounds set forth in paragraphs A-G below. Each of Calpine's responses will be subject to and qualified by these general objections.

A. As the petitioner in this need determination

proceeding, FPL alone carries the affirmative burden of

demonstrating that its proposed projects will satisfy the

statutory need criteria set forth in Section 403.519, Florida

Statutes. FPL did not identify Calpine as a primarily-affected

AUS
CAP
CMP
COM
CFR
ECP
CCL
OPC
MMS
SEC
OTH

RECEIVED & FILED

RJM

FPSC-BUREAU OF RECORDS

RECEIVED

08/05 AUG-5 02

FPSC-COMMISSION CLERK

utility in this proceeding pursuant to Rule 25-22.081, F.A.C. Moreover, FPL did not select Calpine as a finalist on its short list in this proceeding and thus did not conduct any negotiations with Calpine as contemplated by Rule 25-22.082, F.A.C. As an intervenor, Calpine's only burden in this proceeding is to demonstrate that it was a participant in FPL's selection process, a fact that FPL has acknowledged. See Rule 25-22.082(8), F.A.C. Nonetheless, FPL has now served extensive and unduly burdensome discovery requests on Calpine including these 28 requests to produce. FPL's extensive discovery requests are nothing more than a thinly-veiled effort to harass and punish Calpine for intervening in this proceeding. FPL is clearly attempting to deflect the focus of these need determinations from the requisite review of FPL's projects to a wholly irrelevant review of Calpine. Calpine objects to all such discovery requests as irrelevant, immaterial, argumentative, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

B. Calpine objects to any request for production of documents that calls for the creation of information as opposed to the reporting of presently existing information as an improper expansion of Calpine's obligations under the law FPL invokes.

C. Calpine objects to any request for production of documents 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 to these requests for production of documents or is later determined to be applicable for any reason. Calpine in no way intends to waive any such privilege or protection.

D. Calpine objects to any request for production of documents that requires the identification of "all" or "each" as it cannot give assurances, even after a good faith and reasonably diligent attempt, that "all" or "each" responsive document will be produced. Indeed, it may well be impossible to assure compliance even with the exercise of reasonable diligence. Calpine is a large corporation with employees located in different states in many different locations. In the course of its business, Calpine creates numerous documents that are not subject to any regulatory 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 Calpine's responses to these requests for production of documents. Rather, Calpine will provide all responsive documents that Calpine obtains through a reasonable and diligent search conducted in connection with these requests to produce. To the extent that the discovery requests purport to require more of Calpine,

Calpine objects on the grounds that compliance would impose an undue burden and expense on Calpine.

E. Calpine objects to any request to produce that calls for confidential, proprietary business information and/or the compilation of information that is considered confidential, proprietary business information. FPL and its affiliates are direct competitors of Calpine's and FPL should not be allowed to use these proceedings as a fishing expedition to gain access to otherwise highly sensitive, confidential, proprietary business information that FPL will be able to use to its competitive advantage.

F. Calpine objects to providing documents to the extent that such documents are already in the public record before the Florida Public Service Commission and available to FPL through normal procedures.

G. Calpine objects to any requests for production of documents that seek information about, or in the possession of, Calpine's parent or affiliated companies as irrelevant. Calpine is the intervenor in this proceeding, not its parent corporation or any affiliate, and responses will be provided for Calpine only.

SPECIFIC OBJECTIONS

Calpine makes the following specific objections to FPL's First Request for Production of Documents. Calpine's specific

objections are numbered to correspond with the number of FPL's request for production.

1. Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP. In addition, as noted in General Objection A, Calpine objects to this request to produce because it is an attempt to punish and otherwise harass Calpine for intervening in this proceeding. Lastly, Calpine objects to this request to produce to the extent it requests documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, or any other applicable privilege or protection afforded by law.

2. Calpine objects to this request to produce on the grounds that it seeks documents containing highly sensitive, confidential, proprietary business information that, if disclosed to FPL, would give FPL an improper competitive advantage. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP. Lastly,

Calpine objects to this request to produce to the extent it requests documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, or any other applicable privilege or protection afforded by law. Subject to these objections, Calpine will produce non-privileged documents responsive to this request.

3. Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP. Lastly, as noted in General Objection A, Calpine objects to this request to produce because it is an attempt to punish and otherwise harass Calpine for intervening in this proceeding.

4. Calpine objects to this request to produce as vague because FPL has not defined the term "firmness." Calpine objects to this request to produce on the grounds that it seeks documents containing highly sensitive, confidential, proprietary business information that, if disclosed to FPL, would give FPL an improper competitive advantage. Calpine also objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence

admissible in this proceeding. In addition, as noted in General Objection A, Calpine objects to this request to produce because it is an attempt to punish and otherwise harass Calpine for intervening in this proceeding. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP. Lastly, Calpine objects to this request to produce to the extent it requests documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, or any other applicable privilege or protection afforded by law. Subject to the foregoing objections, Calpine will produce non-privileged documents responsive to this request.

5. Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP. Calpine also objects to this request to produce because it seeks information that is part of the public record and available to FPL through normal procedures. Further, Calpine objects to this request to produce because it would place

an unreasonable burden on Calpine to compile and organize responsive information. In addition, as noted in General Objection A, Calpine objects to this request to produce because it is an attempt to punish and otherwise harass Calpine for intervening in this proceeding. Lastly, Calpine objects to this request to produce to the extent it requests documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, or any other applicable privilege or protected afforded by law.

6. Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP.

7. Calpine objects to this request to produce on the grounds that it calls for confidential, proprietary business information that if disclosed to FPL would give FPL an improper competitive advantage. In addition, Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to produce, as irrelevant, to the extent that

this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP. Moreover, as noted in General Objection A, Calpine objects to this request to produce because it is an attempt to punish and otherwise harass Calpine for intervening in this proceeding. Lastly, Calpine objects to this request to produce to the extent it requests documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, or any other applicable privilege or protection afforded by law.

8. Calpine objects to this request to produce to the extent that it calls for confidential, proprietary business information that if disclosed to FPL would give FPL an improper competitive advantage. In addition, Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP. Moreover, as noted in General Objection A, Calpine objects to this request to produce because it is an attempt to punish and otherwise harass Calpine for intervening in this proceeding. Lastly, Calpine objects to this request to produce to the extent

it requests documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, or any other applicable privilege or protection afforded by law.

9. Calpine objects to this request to produce on the grounds that it calls for confidential, proprietary business information that if disclosed to FPL would give FPL an improper competitive advantage. In addition, Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP. Moreover, as noted in General Objection A, Calpine objects to this request to produce because it is an attempt to punish and otherwise harass Calpine for intervening in this proceeding. Lastly, Calpine objects to this request to produce to the extent it requests documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, or any other applicable privilege or protection afforded by law.

10. Calpine objects to this request to produce on the grounds that it calls for confidential, proprietary business information that if disclosed to FPL would give FPL an improper competitive advantage. In addition, Calpine objects to this

request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP. Moreover, as noted in General Objection A, Calpine objects to this request to produce because it is an attempt to punish and otherwise harass Calpine for intervening in this proceeding. Lastly, Calpine objects to this request to produce to the extent it requests documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, or any other applicable privilege or protection afforded by law.

11. Calpine objects to this request to produce on the grounds that it calls for confidential, proprietary business information that if disclosed to FPL would give FPL an improper competitive advantage. In addition, Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP.

Moreover, as noted in General Objection A, Calpine objects to this request to produce because it is an attempt to punish and otherwise harass Calpine for intervening in this proceeding. Lastly, Calpine objects to this request to produce to the extent it requests documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, or any other applicable privilege or protection afforded by law.

16. Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP. Calpine also objects to this request to produce because it seeks information that is part of the public record and available to FPL through normal procedures. Further, Calpine objects to this request to produce because it would place an unreasonable burden on Calpine to compile and organize responsive information that FPL may obtain through its own search of public records. In addition, as noted in General Objection A, Calpine objects to this request to produce because it is an attempt to punish and otherwise harass Calpine for intervening in this proceeding.

17. Calpine objects to this request to produce on the

grounds that it calls for confidential, proprietary business information that if disclosed to FPL would give FPL an improper competitive advantage. In addition, Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP. Moreover, as noted in General Objection A, Calpine objects to this request to produce because it is an attempt to punish and otherwise harass Calpine for intervening in this proceeding. Lastly, Calpine objects to this request to produce to the extent it requests documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, or any other applicable privilege or protection afforded by law.

18. Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP. Calpine also objects to this request to

produce because it seeks information that is part of the public record and available to FPL through normal procedures. Further, Calpine objects to this request to produce because it would place an unreasonable burden on Calpine to compile and organize responsive information. In addition, as noted in General Objection A, Calpine objects to this request to produce because it is an attempt to punish and otherwise harass Calpine for intervening in this proceeding.

19. Calpine objects to this request to produce on the grounds that it calls for confidential, proprietary business information that if disclosed to FPL would give FPL an improper competitive advantage. In addition, Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP. Moreover, as noted in General Objection A, Calpine objects to this request to produce because it is an attempt to punish and otherwise harass Calpine for intervening in this proceeding.

20. Calpine objects to this request to produce on the grounds that it calls for confidential, proprietary business information which, if disclosed to FPL, would give FPL an

improper competitive advantage. In addition, Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP.

Moreover, as noted in General Objection A, Calpine objects to this request to produce because it is an attempt to punish and otherwise harass Calpine for intervening in this proceeding.

Lastly, Calpine objects to this request to produce to the extent it requests documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, or any other applicable privilege or protection afforded by law.

21. Calpine objects to this request to produce to the extent that it seeks confidential, proprietary business information which, if disclosed to FPL, would give FPL an improper competitive advantage. In addition, Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding.

22. Calpine objects to this request to produce to the extent that it seeks confidential, proprietary business information which, if disclosed to FPL, would give FPL an

improper competitive advantage. In addition, Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to the extent that it purports to seek documents concerning, or in the possession of, entities that are not parties to this proceeding.

23. Calpine objects to this request to produce to the extent that it seeks confidential, proprietary business information which, if disclosed to FPL, would give FPL an improper competitive advantage. In addition, Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to the extent that it purports to seek documents concerning, or in the possession of, entities that are not parties to this proceeding.

24. Calpine objects to this request to produce on the grounds that it calls for confidential, proprietary business information that if disclosed to FPL would give FPL an improper competitive advantage. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP. Calpine also objects to this request to

produce to the extent it requests documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, or any other applicable privilege or protection afforded by law.

25. Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine objects to this request to the extent that it purports to seek documents concerning, or in the possession of, entities that are not parties to this proceeding.

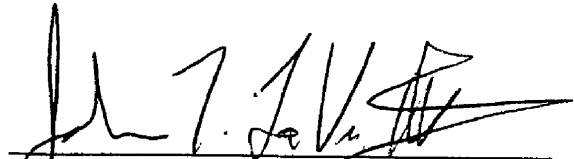
26. Calpine objects to this request to produce on the grounds that it calls for confidential, proprietary business information that if disclosed to FPL would give FPL an improper competitive advantage. In addition, Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Moreover, as noted in General Objection A, Calpine objects to this request to produce because it is an attempt to punish and otherwise harass Calpine for intervening in this proceeding. Lastly, Calpine objects to this request to produce to the extent it requests documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, or any other applicable privilege or protection afforded by law.

27. Calpine objects to this request to produce on the

grounds that it calls for confidential, proprietary business information that if disclosed to FPL would give FPL an improper competitive advantage. In addition, Calpine objects to this request to produce on the grounds that it seeks information not relevant to this proceeding and not reasonably calculated to lead to evidence admissible in this proceeding. Calpine also objects to this request to produce, as irrelevant, to the extent that this request to produce seeks documents concerning Calpine Corporation; Calpine Corporation is not a party to this proceeding and did not respond to FPL's April 26th RFP. Moreover, as noted in General Objection A, Calpine objects to this request to produce because it is an attempt to punish and otherwise harass Calpine for intervening in this proceeding. Lastly, Calpine objects to this request to produce to the extent it requests documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, or any other applicable privilege or protection afforded by law.

28. Subject to the objections made to each of the interrogatories, Calpine will produce the requested documents.

Respectfully submitted this 5th day of August, 2002.

A handwritten signature in black ink, appearing to read 'R. Scheffel Wright', written over a horizontal line.

ROBERT SCHEFFEL WRIGHT
Florida Bar No. 966721
DIANE K. KIESLING
Florida Bar No. 233285
JOHN T. LaVIA, III
Florida Bar No. 853666
310 West College Avenue (32301)
Post Office Box 271
Tallahassee, Florida 32302
Phone: 850/681-0311
FAX: 850/224-5595

ATTORNEYS FOR CALPINE ENERGY
SERVICES, L.P.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery (*), or U.S. Mail, on this 5th day of August 2002, to the following:

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

Jack Shreve, Esq.
Office of Public Counsel
c/o Florida Legislature
111 W. Madison St., Rm. 812
Tallahassee, FL 32399-1400

Charles A. Guyton, Esq.*
Steel, Hector & Davis, LLP
215 South Monroe Street
Suite 601
Tallahassee, FL 32301

John T. Butler, Esq.
Steel Hector & Davis, LLP
200 S. Biscayne Blvd., Suite 4000
Miami, FL 33131-2398

Mr. William G. Walker, III
Vice President
Florida Power & Light Company
215 S. Monroe Street, Suite 810
Tallahassee, FL 32301-1859

R. Wade Litchfield, Esq.
Jay Molyneaux, Esq.
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420

Mr. Michael G. Briggs
Reliant Energy, Inc.
801 Pennsylvania Avenue, Suite 620
Washington, D.C. 20004

Joseph A. McGlothlin, Esq.
Vicki Gordon Kaufman, Esq.
Timothy J. Perry, Esq.
McWhirter, Reeves, McGlothlin,
Davidson, Decker, Kaufman & Arnold, P.A.
117 South Gadsden Street
Tallahassee, FL 32301

Suzanne Brownless, P.A.
1975 Buford Boulevard
Tallahassee, FL 32301

Ms. Beth Bradley
Director of Market Affairs
Mirant Corporation
1155 Perimeter Center West
Atlanta, Georgia 30338

Jon C. Moyle, Jr. Esq.
Cathy M. Sellers, Esq.
Moyle Flanigan Katz Raymond & Sheehan, P.A.
118 North Gadsden Street
Tallahassee, FL 32301

Scott A. Goorland, Esq.
Department of Environmental Protection
3900 Commonwealth Blvd, MS 35
Tallahassee, FL 32399-2400

D. Bruce May, Jr., Esq.
Karen D. Walker, Esq.
Holland & Knight LLP
315 South Calhoun Street
Tallahassee, FL 32301

R.L. Wolfinger
South Pond Energy Park, LLC
c/o Constellation Power Source
111 Market Place, Suite 500
Baltimore, MD 21202-7110

Michael B. Twomey, Esq.
8903 Crawfordville Road
Tallahassee, FL 32305

Ernie Bach, Executive Director
Florida Action Coalition Team
Post Office Box 100
Largo, Florida 33779-0100

John W. McWhirter, Esq.
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman & Arnold, P.A.
400 North Tampa Street, Suite 3350
Tampa, FL 33602

AES Coral
c/o Hogan & Hartson, LLP
Carol Licko
Barclays Financial Center
1111 Brickell Avenue, Suite #1900
Miami, FL 33131

Administrative Procedures Committee
Room 120 Holland Building
Tallahassee, FL 32399-1300

James Beasley, Esq.
Ausley & McMullen
227 South Calhoun Street
Tallahassee, Florida 32301

Myron Rollins, Esq.
Black & Veatch
P.O. Box 8405
Kansas City, MO 64114

CPV Gulfcoast, Ltd.
35 Braintree Hill Office Park
Suite 107
Braintree, MA 01284

Paul Darst
Department of Community Affairs
Division of Resource Planning/Mgmt.
2555 Shumard Oak Blvd.
Tallahassee, FL 32399-2100

Buck Oven
Department of Environmental Protection
Siting Coordination Office
2600 Blairstone Road
Tallahassee, FL 32301

Mr. Mark Robson, Regional Director
Fish & Wildlife Commission
8535 Northlake Boulevard
West Palm Beach, FL 33412

Leslie J. Paugh, P.A.
2473 Care Drive, Suite 3
Tallahassee, FL 32308

James A. McGee
Progress Ventures, Inc.
Post Office Box 14042
St. Petersburg, FL 33733-4042

Michael Busha
Regional Planning Council #10
301 East Ocean Blvd., Suite 300
Stuart, FL 34994-2236

Reliant Energy Power Generation, Inc.
Post Office Box 61867
Houston, TX 77208-1867

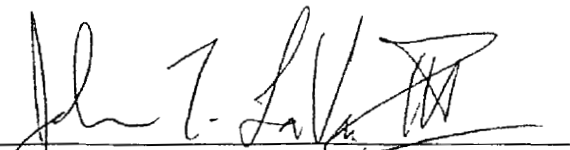
Jim Golden
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, FL 33416-4601

Ms. Angela Llewellyn
Regulatory Affairs
P.O. Box 111
Tampa, FL 33601-0111

Mr. Greg Holder
Regional Director
Fish & Wildlife Commission
3900 Drane Field Road
Lakeland, FL 33811-1299

Mr. Manny L. Pumariega
Regional Planning Council #8
9455 Koger Blvd., #219
St. Petersburg, FL 33702-2491

William Bilenky, Esq.
General Counsel
Southwest Florida Water Management District
2379 Broad Street
Brooksville, FL 34604-6899



Attorney