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September 12, 2002

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
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Tallahassee, Florida 32399-0850

**VIA HAND DELIVERY**

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02 SEP 12 AM 11:56  
COMMISSION  
CLERK

Re: Docket No. 020233-EI

Dear Ms. Bayo:

Enclosed herewith for filing on behalf of Florida Power & Light Company, Florida Power Corporation and Tampa Electric Company ("GridFlorida Companies") is the original and fifteen copies of their Objections to JEA's First Set of Interrogatories (Nos. 1-6).

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me. Thank you for your assistance with this filing.

Sincerely,



Kenneth A. Hoffman, Esq.

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CAF \_\_\_\_\_  
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Enclosures

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09686 SEP 12 08

FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In Re: Review of GridFlorida Regional )  
Transmission Organization (RTO) Proposal )  
\_\_\_\_\_)

Docket No. 020233-EI  
Dated: September 12, 2002

**OBJECTIONS OF FLORIDA POWER & LIGHT COMPANY,  
FLORIDA POWER CORPORATION  
AND TAMPA ELECTRIC COMPANY  
TO JEA'S FIRST  
SET OF INTERROGATORIES (NOS. 1-6)**

Florida Power & Light Company, Florida Power Corporation and Tampa Electric Company ("GridFlorida Companies") by and through their counsel, hereby submit the following objections to the JEA's First Set of Interrogatories.

**I. Preliminary Nature of These Objections**

The objections stated herein are preliminary in nature. Should additional grounds for objection be discovered as the GridFlorida Companies develop their responses, the GridFlorida Companies reserve the right to supplement or modify their objections up to the time they serve their responses. Should the GridFlorida Companies determine that a protective order is necessary regarding any of the requested information, the GridFlorida Companies reserve the right to file a motion with the Commission seeking such an order at the time their responses are due.

**II. General Objections**

1. The GridFlorida Companies object 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. The GridFlorida Companies in no way intend to waive such privilege or protection.

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2. The GridFlorida Companies object to providing information that is proprietary, confidential business information without provisions in place to protect the confidentiality of the information. To the extent JEA's First Set of Interrogatories seek the disclosure of confidential information, the GridFlorida Companies 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. The GridFlorida Companies in no way intend to waive claims of confidentiality.

3. The GridFlorida Companies are large corporations with employees located in many different locations. In the course of their business, The GridFlorida Companies create numerous documents that are not subject to the 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 the GridFlorida Companies' responses to JEA's First Set of Interrogatories. Rather, the GridFlorida Companies' responses will provide all the information that the GridFlorida Companies 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, the GridFlorida Companies object on the grounds that compliance would impose an undue burden or expense on the GridFlorida Companies.

4. The GridFlorida Companies object to each Interrogatory to the extent that it seeks information that is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

5. The GridFlorida Companies object to the definitions set forth in the JEA's First Set of Interrogatories to the extent that they purport to impose upon the GridFlorida Companies obligations that the GridFlorida Companies do not have under the law.

6. The GridFlorida Companies object to the JEA's First Set of Interrogatories to the extent that they call for the creation of analyses, information or documents not already in existence, rather than the provision of presently existing information or documents, as purporting to expand the GridFlorida Companies' obligation under the law.

7. The GridFlorida Companies object to providing information to the extent that such information is already in the public record before the Florida Public Service Commission, the Federal Energy Regulatory Commission and available to the JEA through normal procedures.

Notwithstanding these objections, the GridFlorida Companies will provide where available certain historical information responsive to JEA's requests as has been discussed with representatives of JEA.

Respectfully submitted,

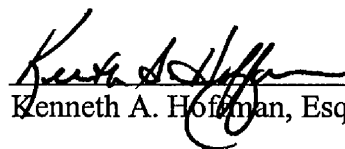
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By:   
Kenneth A. Hoffman, Esq.

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the Objections of Florida Power & Light Company, Florida Power Corporation and Tampa Electric Company to JEA's First Set of Interrogatories has been furnished by United States Mail and Hand Delivery(\*) this 12th day of September, 2002, to the following:

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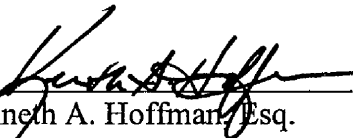
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