ORIGINAL

S T E E L ■ HECTOR ■DAVIS[®]

.

DISTRIBUTION CENTER

02 SEP 30 AM 10: 17

September 27, 2002

Steel Hector & Davis LLP 200 South Biscayne Boulevard Miami, Florida 33131-2398 305.577.7000 305.577.7001 Fax www.steelhector.com

Robert L. Powell, Jr. 305.577.2859 rpowell@steelhector.com

VIA FEDERAL EXPRESS

Ms. Blanca Bayó Division of the Commission Clerk and Administrative Services 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

Re: Docket Nos. 020262-EI, 020263-EI

Dear Ms Bayó:

Enclosed for filing on behalf of Florida Power & Light Company in Docket Nos. 202062-EI and 020263-EI are the original and seven copies of the following:

Florida Power & Light Company's Notice of Serving a Supplemental Response to CPV Gulfcoast, Ltd.'s Third Set of Interrogatories (Nos. 78-117);

Florida Power & Light Company's Notice of Intent to Request Confidential Classification of Certain Information Provided in Supplemental Response to CPV Gulfcoast's Interrogatory No. 82 (Exhibit A to this Notice of Intent contains a copy of this discovery request); and

Florida Power & Light Company's Notice of Intent to Request Confidential Classification of Certain Documents that CPV Gulfcoast, Ltd. has Listed as Possible Exhibits for Use at Hearing (Exhibit A to this Notice of Intent contains a copy of CPV Gulfcoast's Notice of Filing).

I have also enclosed a disk, which contains the above-referenced filings, excluding the exhibits. If you have any questions regarding this transmittal, please contact me at (305) 577-2859.

AUS CAF CMP COM CTR ECR GCL GCL GCL MMS SEC SEC OTH CC: Counsel for parties of record OTH

Very truly yours. RA -P

Robert L. Powell, Jr., Esq.

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: September 27, 2002

FLORIDA POWER & LIGHT COMPANY'S NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION OF CERTAIN INFORMATION PROVIDED IN SUPPLEMENTAL RESPONSE TO CPV GULFCOAST'S INTERROGATORY NO. 82

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 of Certain Information Provided in Supplemental Response to CPV Gulfcoast's Interrogatory No. 82 ("Notice"). This Notice relates to FPL's supplemental answer to CPV Gulfcoast's Interrogatory No. 82. A copy of CPV Gulfcoast's discovery requests giving rise to this answer is appended hereto as Exhibit A. FPL, pursuant to Rule 25-22.006(3)(a), requests confidential handling of certain information furnished in response to this interrogatory.

Respectfully submitted,

R. Wade Litchfield, Esq. Attorney Florida Power & Light Company 700 Universe Boulevard Juno Beach, Florida 33408-0420 Telephone: 561-691-7101 Steel Hector & Davis LLP Attorneys for Florida Power & Light Company 200 South Biscayne Boulevard Suite 4000 Miami, Florida 33131 Telephone: 305-577-2859

By:

Robert L. Powell, Jr., Esq. Florida Bar No. 0195464

DCOLMENT NO MELTE AND 10420 SEP CO B FPSC-COMMINSTANI OLENN

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

I HEREBY CERTIFY that a true and correct copy of FPL's Notice of Intent to Request Confidential Classification of Certain Information Provided in Supplemental Response to CPV Gulfcoast's Interrogatory No. 82 has been furnished by overnight courier (*) or U.S. Mail this 27th day of September, 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 Mbrown@psc.state.fl.us

Vicki Gordon Kaufman, Esq.* Timothy J. Perry, Esq. McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, & Arnold, P.A. 117 South Gadsden Street Tallahassee, Florida 32301 vkaufman@mac-law.com

Jon C. Moyle, Jr., Esq.* Cathy M. Sellers, Esq. Moyle Flanigan Katz Raymond & Sheehan, P.A. 118 North Gadsden Street Tallahassee, Florida 32301 Jmoylejr@moylelaw.com

Joseph A. McGlothlin, Esq.* McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, & Arnold, P.A. 117 South Gadsden Street Tallahassee, Florida 32301 jmcglothlin@mac-law.com

John W. McWhirter, Esq.* McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, & Arnold, P.A. 400 North Tampa Street, Suite 3350 Tampa, Florida 33602 imcwhirter@mac-law.com

Michael Twomey P.O. Box 5256 Tallahassee, Florida 32301 miketwomey@talstar.com

Ernie Bach, Executive Director Florida Action Coalition Team P.O. Box 100 Largo, Florida 33779-0100 ernieb@gte.net

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

Michael Green* 1049 Edmiston Place Longwood, Florida 32779 mgreenconsulting@earthlink.net

D. Bruce May, Jr., Esq.* Karen D. Walker, Esq. Holland & Knight LLP 315 S. Calhoun Street, Suite 600 Tallahassee, Florida 32301 Dbmay@hklaw.com

Robert L. Powell, Jr.

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: August 23, 2002

CPV GULFCOAST, LTD.'S THIRD SET OF INTERROGATORIES TO FLORIDA POWER & LIGHT COMPANY (Nos. 78-117)

CPV GULFCOAST, LTD. (hereinafter "CPV Gulfcoast"), by and through its undersigned counsel, pursuant to Rule 1.340, Florida Rules of Civil Procedure, and Rule 28-106.206, Florida Administrative Code, propounds the following Interrogatories to Florida Power & Light Company ("FPL"). These interrogatories are to be answered under oath within 20 days of service.

DEFINITIONS

A. As used herein, the following words shall have the meanings indicated:

(i) "person" or "persons" shall mean and include natural persons, corporations, partnerships, associations, joint ventures, proprietorships, entities and all other forms of organizations or associations;

(ii) "document" or "report" shall mean any kind of written, typed, recorded, or graphic matter, however produced or reproduced, of any kind or description, whether sent or received,

EXHIBIT A

including originals, non-identical copies and drafts and both sides thereof; and including, but not limited to: papers, books, letters, correspondence, telegrams, bulletins, notices, announcements, instructions, charts, manuals, brochures, schedules, cables, telex messages, memoranda, notes, notations, accountants' working papers, transcripts, minutes, agendas, reports and recordings of telephone or other conversations, of interviews, of conferences, or of other meetings, affidavits, statements, summaries, opinions, reports, studies, analyses, evaluations, contracts, agreements, journals, statistical records, desk calendars, appointment books, diaries, lists, tabulations, sound recordings, computer print-outs, data processing input and output, microfilms, and all other records kept by electronic, photographic, or mechanical means and things similar to any of the foregoing, however denominated by you, and any other documents as defined in Rule 1.340, Florida Rules of Procedure;

(iii) "identify" shall mean, with respect to any document or report; set forth the title, if any, describe the relevant page or pages and line or lines thereof (or annex a copy to the answer to these interrogatories, with appropriate designations of such page or pages and line or lines), and state the present location and custodian of the original and all copies of the document, who prepared the document, and when it was prepared; "identify" means, with respect to any person, set forth the name, title and business address of the person;

(iv) documents or reports to be identified shall include all documents in your possession, custody and control and all other documents of which you have knowledge;

(v) to the extent an interrogatory calls for information which cannot now be precisely and completely furnished, such information as can be furnished should be included in the answer, together with a statement that further information cannot be furnished, and a statement as to the reasons therefor. If you expect to obtain further information between the time answers are served and the time of hearing, you are requested to state this fact in each answer. If the information which cannot now be furnished is believed to be available to another person, identify such other person and the reasons for believing such person has the described information;

(vi) in the event any interrogatory herein calls for information or for the identification of a document which you deem to be privileged, in whole or in part, the information should be given or the document identified to the fullest extent possible consistent with such claim of privilege and specify the grounds relied upon for the claim of privilege; and

(vii) for each interrogatory, identify the name, address, telephone number and position of the person responsible for providing the answer.

Interrogatory No. 82:

Please identify any power project FPL constructed in the last five (5) years (including any repowerings) and identify the FPL manager or coordinator of any such project; the project's original projected date of completion, any amended or revised projected dates of completion, and date of actual completion; whether such project was on schedule, and if not on schedule, the total number of days such project was delayed; and the project's projected total installed cost and actual total installed cost.

Response: