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John T. Butler, P.A. 305.577.2939 jtb@steelhector.com

October 11, 2002

### -VIA FEDERAL EXPRESS-

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

#### Re: Docket No. 020001-EI

Dear Ms. Bayó:

S T E E L

HECTOR

8 D A V I S

INTERNATIONAL<sup>S44</sup>

I am enclosing for filing in the above docket the original and seven (7) copies of Florida Power & Light Company's ("FPL") Notice of Serving Response to Staff's Second Set of Interrogatories (Nos. 21-50), First Request for Production of Documents (Nos. 1-11) and First Request for Admissions (Nos. 1-4) and of FPL's Notice of Intent to Seek Confidential Classification (Requests No. 7 and 9-11 and Interrogatories No. 34-37, 39, 49-50), together with a diskette containing the electronic version of same. The enclosed diskette is HD density, the operating system is Windows 2000, and the word processing software in which the documents appear is Word 2000.

If there are any questions regarding this transmittal, please contact me at 305-577-2939.

Very truly yours,

Vorel M. Pubi for JTB

- the

John T. Butler, P.A.

cc: Counsel for Parties of Record (w/encl.)

Notice of Serving Response DOCUMENT NUMBER DATE Notice of Intert DOCUMENT NUMBER-DATE

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#### **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Fuel and purchased power cost recovery clause with generating performance incentive factor. Docket No. 020001-EI Dated: October 11, 2002

# FLORIDA POWER & LIGHT COMPANY'S NOTICE OF SERVING RESPONSE TO STAFF'S SECOND SET OF INTERROGATORIES (NOS. 21-50), FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-11) AND FIRST REQUEST FOR ADMISSIONS (NOS. 1-4)

Florida Power & Light Company hereby gives notice of serving its Response to Staff's Second Set of Interrogatories (Nos. 21-50), First Request for Production of Documents (Nos. 1-11) and First Request for Admissions (Nos. 1-4) to Wm. Cochran Keating, Esq., counsel for the Staff, on October 11, 2002.

Respectfully submitted,

R. Wade Litchfield, Esq. Senior 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 33131-2398 Telephone: 305-577-2939

By: Kerel M. Juhn for MB John T. Butler, P.A.

John T. Butler, P.A. Fla. Bar No. 283479

DOCUMENT NUMBER CATE 1098 OCT 148 FPSC-COMMISSION CLERK

## CERTIFICATE OF SERVICE Docket Nos. 020001-EI

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Notice of Serving Response to Staff's Second Set of Interrogatories (Nos. 21-50), First Request for Production of Documents (Nos. 1-11) and First Request for Admissions (Nos. 1-4) has been furnished by Federal Express (\*) or United States Mail on this 11<sup>th</sup> day of October, 2002, to the following:

Wm. Cochran Keating, IV, Esq.(\*) Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

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By: Koul M. Dubinfor JTB

John T. Butler, P.A.