

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Florida Power & Light Company's) Docket No. 040206-EU
Petition for Determination of Need for Turkey)
Point Unit 5 Electrical Power Plant Power) Filed May 5, 2004.

**CALPINE ENERGY SERVICES, L.P.'s SECOND SET OF INTERROGATORIES
TO FLORIDA POWER & LIGHT COMPANY (Nos. 19)**

Pursuant to Rule 1.340, Florida Rules of Civil Procedure, **CALPINE ENERGY SERVICES, L.P.'s** (hereinafter "Calpine"), by and through its undersigned attorney, hereby serves its First Set of Interrogatories (No. 19) to Florida Power & Light Company. These interrogatories shall be answered under oath by you or through your agent who is qualified to answer and who shall be fully identified, with said answers being served as provided pursuant to the Rules of Civil Procedure, within twenty (20) days.

DEFINITIONS

"You," "your," "Company," or "FPL" refers to Florida Power & Light Company, its employees and authorized agents.

"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, 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, notes, computer models, 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,

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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;

“Identify” shall mean:

- (a) With respect to a person, to state the person’s name, address, and business relationship (e.g., “employee”) to the Company;
- (b) With respect to any document or report, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.
- (c) 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
- (d) for each interrogatory, identify the name, address, telephone number and position of the person responsible for providing the answer.

INTERROGATORIES

19. For each expert you intend to call as a witness in this case who will express an expert opinion with regard to the issues in this case, specifically identify and/or disclose:

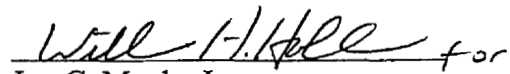
a. each expert's name and address and are and/or field of expertise.

b. the date you retained each expert

c. the issue(s) on which each expert is expected to testify, as follows:

d. the subject matter about which each expert is expected to testify

Respectfully submitted this 5 day of May, 2004.

 *Will H. Hill* for

Jon C. Moyle, Jr.

Florida Bar No. 0727016

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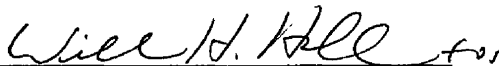
CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy was served by hand-delivery this 5 day of **May, 2004**, on Jennifer Brubaker, Esq., Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-9850; Charles A. Guyton, Esq., Steel Hector & Davis, LLP, 215 South Monroe Street, Suite 601, Tallahassee, FL 32301, and Mr. Bill Walker and Ms. Lynne Adams, Florida Power & Light Company, 215 South Monroe Street, Suite 810, Tallahassee, Florida 32301-1859; and by U.S. Mail to the following persons:

R. Wade Litchfield, Esquire
Natalie F. Smith, Esquire
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 22408-0420

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Paul Darst
Strategic Planning
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Tallahassee, Florida 32399-2100

Department of Environmental Protection
Buck Oven
Siting Coordination Office
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Jon C. Moyle, Jr.