STEEL HECTOR & DAVIS REGISTERED LIMITED LIABILITY PARTNERSHIP

ORIGINAL

May 25, 1999

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## Via Hand Delivery

Debra Swim Senior Attorney Legal Environmental Assistance Foundation, Inc. 1114-E Thomasville Road Tallahassee, FL 32303-6290

## **Docket No. 971004-EG** Re: **Revised Interrogatories 7c and 9d**

Dear Deb:

Consistent with our agreement at last Friday's discovery meeting with Mr. Elias, FPL is substituting the following questions for Interrogatories 7c and 9d in FPL's First Set of Interrogatories to LEAF. They are substituted for the entire questions, including the prefatory statement made in each of the original questions.

- Please explain in detail how utility energy efficiency programs result in 7.(c) environmental and health benefits if they avoid baseload power plants with lower heat rates and emission rates than existing power plants, resulting in the existing power plants with higher heat rates and emission rates to generate more than they would if the avoided power plants had been built.
- 9.(d) Please explain in detail how energy efficiency that avoids new, efficient power plants with low emission rates decreases total system emissions.

FPL understands that LEAF will respond to these restated questions within 30 days from today.

Please call if you have any questions.

AFA APP CAF CMU CTR EAG LEG MAS co: Counsel for all Parties of Record OPC RRR SEC WAW Miami OTH West Palm Beach

Very truly yours Charles & Guipon

Charles A. Guvton

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