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ATTORNEYS AT LAW

REPLY TO:

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Tallahassee

July 28, 1999

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Blanca Bayo  
Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850

RECEIVED - 11:00  
07 JUL 28 PM 2:02  
RECORDS AND REPORTING

Re: Docket # 981890-EU - Generic investigation into the aggregate electric utility reserve margins planned for Peninsular Florida

Dear Ms. Bayo:

Enclosed find original and one copy of Notice of Service of the City of Lakeland's Answers to Staff's First Set of Interrogatories (Nos. 1-47) and Notice of Service of the City of Lakeland's Response to Staff's First Request for Production of Documents (Nos. 1-5) to be filed in the above captioned case.

Thank you.

RECEIVED & FILED

*[Signature]*  
FPSC-BUREAU OF RECORDS

Very truly yours,

*[Signature]*

Roy C. Young

RCY:swp  
Enclosures

- ATA
- ATP
- CAP
- CPM
- CTR
- ELG
- LBO
- MSO
- OTC
- OTR
- REC
- WSP
- OTH

swp\Lakeland\Bayo.728

*Answers*  
DOCUMENT NUMBER-DATE  
08929 JUL 28 1999  
FPSC-RECORDS/REPORTING

*Responses*  
DOCUMENT NUMBER-DATE  
08930 JUL 28 1999  
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

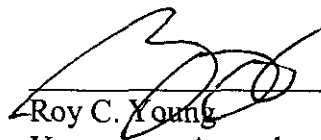
In re: Generic investigation into the  
aggregate electric utility reserve margins  
planned for Peninsular Florida.

DOCKET NO. 981890-EU

JULY 28, 1999

NOTICE OF SERVICE OF THE CITY OF LAKELAND'S  
ANSWERS TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-47)

PLEASE TAKE NOTICE THAT on this date the City of Lakeland served by U.S. mail the original of its Answers to the Florida Public Service Commission Staff's First Set of Interrogatories (Nos. 1-47), together with a formatted high density 3.5 inch diskette, to Robert V. Elias and Leslie J. Paugh, Staff Counsel, Florida Public Service Commission, Gerald L. Gunter Building, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399.



Roy C. Young  
Young, van Assenderp & Varnadoe, P.A.  
225 South Adams Street  
Tallahassee, FL 32301  
Telephone: 850/222-7206

Attorneys for the City of Lakeland

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic investigation into the  
aggregate electric utility reserve margins  
planned for Peninsular Florida

DOCKET NO. 981890-EU

NOTICE OF SERVICE OF THE CITY OF LAKELAND'S  
ANSWERS TO STAFF'S FIRST INTERROGATORIES (NOS 1-47)

I HEREBY CERTIFY that the City of Lakeland's Answers to Staff's First Interrogatories  
(Nos. 1-47) have been furnished via U.S. Mail this 28<sup>th</sup> day of July, 1999, to the following:

Reedy Creek Improvement District  
Willard Smith/Fran Winchester Post Office  
Box 10175  
Lake Buena Vista, FL 32830

Utilities Commission  
City of New Smyrna Beach  
Ronald L. Vaden  
Post Office Box 100  
New Smyrna Beach, FL 32170

City of Tallahassee  
Richard G. Feldman  
300 S. Adams Street  
Tallahassee, FL 32301

Office of Public Counsel  
John Roger Howe  
111 W. Madison Street, Room 812  
Tallahassee, FL 32399

McWhirter Reeves McGlothlin  
Vicki Gordon Kaufman  
117 South Gadsden Street  
Tallahassee, FL 32301

Beggs & Lane  
Jeffrey Stone  
Post Office Box 12950  
Pensacola, FL 32576

Ausley & McMullen  
James Beasley  
Post Office Box 391  
Tallahassee, FL 32301

FL Electric Cooperative Association  
Michelle Hershel  
Post Office Box 590  
Tallahassee, FL 32302

Legal Environmental Assistance Foundation  
Deb Swim  
1114 Thomasville Road, Suite E  
Tallahassee, FL 32303

Florida Reliability Coordinating Council  
Ken Wiley  
405 Reo Street, Suite 100  
Tampa, FL 33609

Landers & Parsons  
Scheff Wright  
Post Office Box 271  
Tallahassee, FL 32302

Moyle Flanigan  
Jon Moyle, Jr.  
210 South Monroe Street  
Tallahassee, FL 32301

Steel Hector and Davis  
Matthew M. Childs  
215 South Monroe Street - Suite 601  
Tallahassee, FL 32301

City of Lake Worth Utilities  
Harvey Wildschuetz  
1900 Second Avenue, North  
Lake Worth, FL 33461

Florida Power Corporation  
Jim McGee  
Post Office Box 14042  
St. Petersburg, FL 33733

Kissimmee Utility Authority  
A.K. (Ben) Sharma  
Post Office Box 423219  
Kissimmee, FL 34742

Florida Municipal Power Agency  
Frederick Bryant  
P. O. Box 3209  
Tallahassee, FL 32315

Thomas J. Maida  
Foley & Lardner  
300 East Park Avenue  
Tallahassee, FL 32301

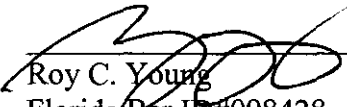
City of Homestead  
James Swartz  
675 N. Flagler Street  
Homestead, FL 33030

Jacksonville Electric Authority  
Tracy E. Danese  
21 West Church Street - Tower 16  
Jacksonville, FL 32202

Gainesville Regional Utilities  
Raymond O. Manasco, Jr.  
Post Office Box 147117  
Station A-138  
Gainesville, FL 32614-7117

Orlando Utilities Commission  
T.B. Tart  
Post Office Box 3193  
Orlando, FL 32802

Thornton Williams & Associates  
Paul Sexton  
P. O. Box 10109  
Tallahassee, FL 32302

  
Roy C. Young

Florida Bar ID#098428

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