## **ORIGINA**



August 25, 1999

Ms. Blanca Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0950

RE: Docket No.: 981890-EU Generic Investigation into the aggregate electric utility reserve margin planned for Peninsular Florida

Dear Ms. Bayo:

Enclosed, for filing in the docket referenced above, are the original and ten copies of LEAF's Notice of Service of First Set of Interrogatories to Florida Power and Light, Florida Power Corporation, Gulf Power Company, Tampa Electric Company, Jacksonville Electric Company, and Orlando Utilities Company.

Please document this filing by stamping the attached copy of this letter. Thank you for your assistance in this matter. If you have questions, please let me know.

Sincerely,

Debra Swim

Debra Swim Senior Attorney Energy Advocacy Project

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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 981890-EU

NOTICE OF SERVICE OF LEAF'S FIRST SET OF INTERROGATORIES

TO FLORIDA POWER AND LIGHT COMPANY, FLORIDA POWER CORPORATION,

GULF POWER COMPANY, TAMPA ELECTRIC COMPANY,

JACKSONVILLE ELECTRIC COMPANY, AND ORLANDO UTILITIES COMMISSION

I HEREBY CERTIFY that the original and one copy of LEAF's First Interrogatories (Nos. 1 - 12) to Florida Power and Light Company, were hand delivered to Mr. Bill Walker and Mr. Matt Childs, Steel Hector, 215 S. Monroe Street, Suite 810, Tallahassee, FL 32301-1859; sent by overnight mail to Mr. James McGee, Florida Power Corporation, P.O. Box 14042, St. Petersburg, FL 33733; sent by U.S. mail to Mr. Jeff Stone, Beggs & Lane, P.O. Box 12950, Pensacola, FL 32576-2950; Mr. Tracy E. Danese, Jacksonville Electric Authority, 21 West Church St., T-16, Jacksonville, FL 32202; and Mr. T.B. Tart, Orlando Utilities Commission, P.O. Box 3193, Orlando, FL 32802; and that the original and one copy of LEAF's First Interrogatories to Tampa Electric Company (Nos. 1- 14), were hand delivered to Mr. Lee Willis and Mr. James Beasley, Ausley & McMullen, 227 S. Calhoun Street, Tallahassee, FL 32301 this 25th day of August, 1999.

Debra Swim, Esquire Legal Environmental Assistance Foundation, Inc. 1114 Thomasville Road, Suite E Tallahassee, Florida 32303 (904) 681-2591

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that the original and ten true copies of the foregoing Notice of Service of Interrogatories to Florida Power and Light, Florida Power Corporation, Gulf Power Company, Tampa Electric Company, Jacksonville Electric Authority, and Orlando Utilities Commission were sent by U.S. Mail to Florida Public Service Commission, Division of Records and Reporting, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, FL 32399-0950, and that true copies were sent by U.S. mail, or hand delivered (when indicated by\*), this 25th day of August, 1999 to:

Robert V. Elias, Esquire Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Paul Sexton, Esquire Thornton J. Williams, Esquire Thornton Williams & Associates P.O. Box 10109 Tallahassee, FL 32302 Bill Walker, Esquire\*
Matthew M. Childs, Esquire\*
Steel Hector & Davis
215 S. Monroe Street, Suite 601
Tallahassee, FL 32301-1804

Jeffrey A. Stone, Esquire Beggs & Lane P.O. Box 12950 Pensacola, FL 32756-2950 Michelle Hershel, Esquire Florida Electric Cooperative Association P.O. Box 590 Tallahassee, FL 32302

Joseph A. McGlothlin, Esquire Vicki Gordon Kaufman, Esquire McWhirter, Reeves, McGlothlin et al 117 S. Gadsden Street Tallahassee, FL 32301

John W. McWhirter, Jr., Esquire McWhirter, Reeves, McGlothlin et al P.O. Box 3350 Tampa, FL 33601-3350

Sheff Wright Landers & Parsons P.O. Box 2721 Tallahasee, FL 32301

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

James A. McGee Florida Power Corporation P.O. Box 14042 St. Petersburg, FL 33733

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Jon Moyle, Esquire Mole, Flanigan, Katz, Kolins, et al The Perkins House 118 North Gadsden Street Tallahassee, FL 32301

Lee L. Willis, Esquire\* James D. Beasley, Esquire\* Ausley & Beasley P.O. Box 391 Tallahassee, FL 32302

Frederick M. Bryant, Esquire FL Municipal Power Agency 2010 Delta Boulevard Tallahassee, FL 32315 Ken Wiley FL Reliability Coordinating Council 405 Reo Street, Suite 100 Tampa, FL 33609

Gary Lawrence City of Lakeland 501 East Lemon Street Lakeland, FL 32961

Rex Taylor City of Vero Beach P.O. Box 1389 Vero Beach, FL 32961

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

Ben Sharma Kissimmee Utility Authority P.O. Box 423219 Kissimmee, FL 34742

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

Charles A. Russell Florida Keys Electric Cooperative P.O. Box 377 Tavernier, FL 33070

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

Gary Sasso, Esquire Carlton Fields P.O. Box 2861 St. Petersburg, FL 33731

James Swartz City of Homestead 675 N. Flagler Street Homestead, FL 33030 J. Paul Wetzel City of St. Cloud 1300 Ninth Street St. Cloud, FL 34769

Thomas W. Richards Fort Pierce Utilities P.O. Box 3191 Ft. Pierce, FL 34948

Dean Shaw City of Ocala P.O. Box 1270 Ocala, FL 34478

Timothy Woodbury Seminole Electric Coop. P.O. Box 272000 Tampa, FL 33688

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

T. B. Tart Orlando Utilities Comm. P.O. Box 3193 Orlando, FL 32802

Larry J. Thompson Utility Board of the City of Key West P.O. Drawer 6100 Key West, FL 33041

Robert C. Williams Florida Municipal Power Agency, Suite 100 7201 Lake Ellenor Drive Orlando, FL 32809 Utilities Commission
City of New Smyrna Beach
Ronald L. Vaden
Post Office Box 100
New Smyrna Beach, FL 32170

Reedy Creek Improvement District Willard Smith/Fran Winchester P.O. Box 10175 Lake Buena Vista, FL 32830

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

Kenneth A. Hoffman Rutledge, Ecenia, Purnell & Hoffman P.O. Box 551 Tallahassee, FL 32302

DEBRA SWIM