

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Determination of)
Need for an Electrical Power Plant in) DOCKET NO. 99-1462-EU
Okeechobee County by Okeechobee)
Generating Company, L.L.C.) FILED: November 12, 1999

OKEECHOBEE GENERATING COMPANY'S OBJECTIONS
TO FLORIDA POWER & LIGHT COMPANY'S FIRST SET OF
INTERROGATORIES (NOS. 1-61)

Okeechobee Generating Company, L.L.C. ("OGC"), pursuant to the
Commission's Order Establishing Procedure, as revised, and the Order
Establishing Expedited Discovery Schedule, hereby respectfully
submits its objections to Florida Power & Light Company's ("FPL")
First Set of Interrogatories (Nos. 1-61), which were served on OGC
on November 2, 1999. OGC notes for the record that FPL's First Set
of Interrogatories do not include Interrogatories Nos. 38 and 39.

GENERAL OBJECTIONS

OGC objects to FPL's First Set of Interrogatories on the
grounds set forth in paragraphs A-D below. Each of OGC's responses
will be subject to and qualified by these general objections.

A. OGC objects to FPL's request that the answers to these
interrogatories be provided on or before November 12, 1999.

Pursuant to the Order Establishing Expedited Discovery Schedule,

issued on November 8, 1999, OGC's responses to FPL's First Set of
Interrogatories are due on November 16, 1999.

B. OGC objects to any interrogatory that calls for the
creation of information as opposed to the reporting of presently
existing information as an improper expansion of OGC's obligations

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under the law FPL invokes.

C. OGC objects to any interrogatory that calls for information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time response is first made to these interrogatories or is later determined to be applicable for any reason. OGC in no way intends to waive any such privilege or protection.

D. OGC objects to any interrogatory that calls for confidential, proprietary business information and/or the compilation of information that is considered confidential, proprietary business information.

SPECIFIC OBJECTIONS

OGC makes the following specific objections to FPL's First Set of Interrogatories. OGC's specific objections are numbered to correspond with the number of FPL's interrogatories.

2. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

3. OGC objects to this interrogatory in its entirety on the grounds that it seeks confidential, proprietary business information.

6. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

7. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

8. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

9. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

13. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

14. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

15. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

18. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

21. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

23. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

28. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

29. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information. In addition, OGC

objects to this interrogatory on the grounds that Gulfstream National Gas Systems is not a party to this proceeding.

30. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

34. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

35. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

36. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

37. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

38. There is no interrogatory numbered 38.

39. There is no interrogatory numbered 39.

40. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

41. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

42. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

44. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

45. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

46. OGC objects to this interrogatory in its entirety on the grounds that it seeks confidential, proprietary business information.

47. OGC objects to this interrogatory on the grounds that it

seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

49. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

50. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

53. OGC objects to this interrogatory on the grounds that it is irrelevant and outside of scope of allowable discovery.

54. OGC objects to the interrogatory to the extent that it requests OGC to "provide" analysis. OGC will identify such analysis, but is under no obligation to provide copies of the analyses in response to an interrogatory.

56. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

58. OGC objects to this interrogatory in its entirety on the grounds that it seeks confidential, proprietary business information. OGC also objects to the interrogatory because it calls

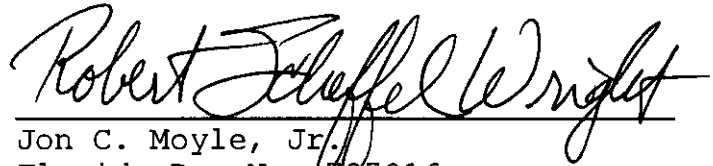
for information protected by the work product doctrine.

59. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC also objects to the interrogatory because it calls for information protected by the work product doctrine. OGC will attempt to respond to this interrogatory to the extent possible with non-confidential, non-proprietary, non-privileged information.

60. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC also objects to this interrogatory because it calls for information protected by the attorney-client privilege and the work product doctrine. Lastly, OGC objects to this interrogatory because it is overbroad. OGC will attempt to respond to this interrogatory to the extent possible with non-confidential, non-proprietary, non-privileged information.

61. OGC objects to this interrogatory on the grounds that it seeks confidential, proprietary business information. OGC will attempt to respond to the interrogatory to the extent possible with non-confidential, non-proprietary information.

Respectfully submitted this 12th day of November, 1999.



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CERTIFICATE OF SERVICE
DOCKET NO. 991462-EU

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by hand delivery (*), facsimile transmission (**), or by United States Mail, postage prepaid, on the following individuals this 12th day of November, 1999.

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