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¥

February 21, 2000

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: In re: Petition for Determination of Need for an Electrical Power Plant in Okeechobee County by Okeechobee Generating Company, L.L.C. Docket No. 991462-EU

Dear Ms. Bayo:

Enclosures

Enclosed for filing in the above docket is the original and one (1) copy of Florida Power Corporation's Objections to OGC's Second Request for Production of Documents (Nos. 30-35).

We request you acknowledge receipt and filing of the above by stamping the additional copy of this letter and returning it to me in the self-addressed, stamped envelope provided.

If you or your Staff have any questions regarding this filing, please contact me at (727) 821-7000.

Very truly yours,

Jary J. Sasso Gary L. Sasso ja

00 EEB SS #4 10 53 RECEIVED & FILED FPSC-BUREAU OF RECORDS : **•** • DOCUMENT NUMBER-DATE -----Carlton. Fields. Ward. EMMANUEL. SMITH & EB221 R. P.A. TALLAHASSEE FPOOTROCHASSIREPOR PETERSBURG Objections require міамі ORLANDO / PENSACO oris

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition for Determination of Need for an Electrical Power Plant in Okeechobee County by Okeechobee Generating Company, L.L.C.

DOCKET NO. 991462-EU

Submitted for filing: February 21, 2000

ORIGINIAL

FLORIDA POWER CORPORATION'S OBJECTIONS TO OGC'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 30-35)

Florida Power Corporation ("FPC") objects to the Second Request by Okeechobee

Generating Company ("OGC") for Production of Documents (Nos. 30-35) to Florida Power

Corporation, as follows:

Florida Power Corporation will agree to produce documents responsive to OGC's request, if any, provided such documents are not covered by the attorney-client privilege, the work product doctrine, or other applicable privileges. To the extent that OGC's requests may be construed to call for the production of privileged documents or documents covered by the work product doctrine, FPC objects to those requests.

Respectfully submitted,

FLORIDA POWER CORPORATION

GARY L. SASSO Florida Bar No. 622575 JILL H. BOWMAN Florida Bar No. 057304 Carlton, Fields, Ward, Emmanuel, Smith & Cutler, P.A. Post Office Box 2861 St. Petersburg, FL 33731 Telephone: (727) 821-7000 Telecopier: (727) 822-3768

> DOCUMENT NUMBER-DATE 02443 FEB 228 FPSC- RECORDS/REPORTING

JAMES A. McGEE Senior Counsel FLORIDA POWER CORPORATION P.O. Box 14042 St. Petersburg, Florida 33733 Telephone: (727) 820-5184 Facsimile: (727) 820-5519

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing FLORIDA POWER CORPORATION'S OBJECTIONS TO OGC'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 30-35) has been furnished by facsimile and U.S. Mail to Robert Scheffel Wright and John Moyle as counsel for Okeechobee Generating Company, LLC and to all other counsel and parties of record via U.S. Mail this <u>21st</u> day of February, 2000.

Attorney

COUNSEL OF RECORD:

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