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RECORDS AND REPORTING

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March 9, 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:

Enclosed for filing in the above docket are the original and 15 copies of Florida Power Corporation's Objections to Petitioner's Third Request for Production of Documents (No. 36).

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,

*Gary L. Sasso*  
Gary L. Sasso *js*

Enclosure

APA \_\_\_\_\_  
APP 1 \_\_\_\_\_  
CAF \_\_\_\_\_  
CMU \_\_\_\_\_  
CTR \_\_\_\_\_  
EAG \_\_\_\_\_  
LEG 5 \_\_\_\_\_  
MAS \_\_\_\_\_  
OPC \_\_\_\_\_  
RRR \_\_\_\_\_  
SEC 1 \_\_\_\_\_  
WVBY \_\_\_\_\_  
QTHI \_\_\_\_\_

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FLORIDA PUBLIC SERVICE COMMISSION  
CLEARFIELD

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Determination	)	
of Need for an Electrical Power	)	DOCKET NO. 991462-EU
Plant in Okeechobee County by	)	
Okeechobee Generating Company,	)	Submitted for filing: March 10, 2000
L.L.C.	)	
_____	)	

**FLORIDA POWER CORPORATION'S OBJECTIONS  
TO PETITIONER'S THIRD REQUEST FOR PRODUCTION  
OF DOCUMENTS (NO. 36)**

Florida Power Corporation (FPC) serves its objections to Okeechobee Generating Company's Third Request for Production of Documents (No. 36) to Florida Power Corporation, as follows:

**OBJECTIONS TO INSTRUCTIONS**

A. FPC objects to Petitioner's instruction to produce the requested documents at Landers & Parsons, P.A., in Tallahassee and will agree to produce documents, as may be appropriate, at a reasonable time and place.

B. FPC objects to Petitioner's instruction calling upon FPC to provide the designated information regarding any documents withheld from production. FPC will comply with its obligations under applicable rules of procedure.

C. FPC objects to Petitioner's instruction to provide the designated information concerning withheld documents. For purposes of expediency, counsel for FPC and the Petitioner previously reached an agreement not to exchange privilege logs concerning attorney-client or work product documents.

D. FPC objects to Petitioner's instruction "D" and will agree to produce any responsive documents in accordance with FPC's obligations under applicable rules.

## OBJECTIONS TO DEFINITIONS

FPC objections to any attempt to expand FPC's obligations under the applicable rules, including Petitioner's efforts in definitions "A," "E," and "F" to expand the persons subject to requests served upon a party.

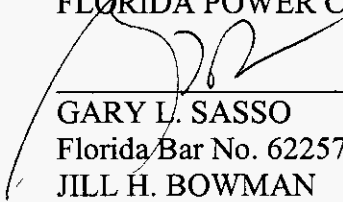
## OBJECTIONS TO DOCUMENT REQUESTS

FPC objections to any request to the extent it may be construed to call for the production of attorney-client materials, work product, confidential or proprietary materials, or documents covered by any other applicable privilege or protection from disclosure.

Respectfully submitted,

FLORIDA POWER CORPORATION

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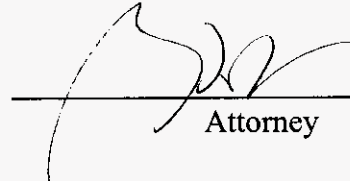


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing FLORIDA POWER CORPORATION'S OBJECTIONS TO PETITIONER'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 36) has been furnished by facsimile and U.S. Mail to Robert Scheffel Wright and John Moyle as counsel for Okeechobee Generating Company, L.L.C. and to all other counsel of record as listed below via U.S. Mail this 9<sup>th</sup> day of March, 2000.

  
\_\_\_\_\_  
Attorney

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