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May 15, 2000

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

RECEIVED-FPSC  
00 MAY 15 PM 4:36  
RECORDS AND  
REPORTING

Re: Seminole Electric Docket # 981827-EC

Dear Ms. Bayó:

Enclosed for filing on behalf of Seminole Electric Cooperative, Inc. are the original and seven copies of its:

- 1) Preliminary Objections To, And Requests For Clarification Of, LCEC's First Request For Production of Documents 06006-00
- 2) Preliminary Objections To LCEC's First Set of Interrogatories 06007-00

By copy of this letter, these documents have been furnished to the parties on the attached service list.

Very truly yours,

Richard D. Melson

AFA \_\_\_\_\_  
 APP \_\_\_\_\_  
 CAF \_\_\_\_\_  
 CMU \_\_\_\_\_ RDM/kcg  
 CTR \_\_\_\_\_ Enclosures  
 EAG \_\_\_\_\_ cc: Parties of Record  
 LEG \_\_\_\_\_  
 MAS \_\_\_\_\_  
 OPC \_\_\_\_\_  
 RRR \_\_\_\_\_  
 SEC \_\_\_\_\_  
 WAW \_\_\_\_\_ 118728.1  
 CTM \_\_\_\_\_

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FPSC-BUREAU OF RECORDS

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint and petition by Lee County	)	
Electric Cooperative, Inc. for an investigation	)	Docket No. 981827-EC
of the rate structure of Seminole Electric	)	
Cooperative, Inc.	)	Filed: May 15, 2000
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**SEMINOLE'S PRELIMINARY OBJECTIONS TO  
LCEC's FIRST SET OF INTERROGATORIES**

Pursuant to the Order on Procedure in this docket, Seminole Electric Cooperative, Inc. (Seminole) makes the following preliminary objections to Lee County Electric Cooperative, Inc.'s (LCEC's) First Request for Production of Documents.

The following objections relate to all requests for production:

**GENERAL OBJECTIONS**

1. Seminole objects to providing any information which is covered by attorney-client or work product privileges.
2. Seminole objects to providing any information which constitutes proprietary confidential business information without an appropriate protective agreement. Counsel for LCEC should contact counsel for Seminole to arrange for the execution of such an agreement.

**SPECIFIC OBJECTIONS**

3. Seminole objects to the second sentence of Interrogatory No. 3 on the grounds that it is overbroad and unduly burdensome in that it improperly requires Seminole to undertake a study, which it has not performed, of any differences between its current projected billing units and any information contained in any documents produced in response to LCEC's First Request for Production of Documents. LCEC should bear the initial burden of reviewing the response to the document production and framing a specific interrogatory or interrogatories directed to specific documents.
4. Seminole objects to Interrogatory Nos. 7 and 8 on the grounds that they are inconsistent with the Commission's procedures. The identity of each witness, and the substance of the witness' testimony, will be contained in that witness' prefiled testimony, which will be submitted on the schedule contained in the governing Order on Procedure.

5. Seminole objects to Interrogatory No. 9 on the grounds that it is inconsistent with the Commission's procedures. Each document that Seminole intends to introduce into evidence as a direct or rebuttal exhibit will be attached to the prefiled testimony of one of its witnesses, which will be submitted on the schedule contained in the governing Order on Procedure. Seminole objects to any requirement to identify exhibits which it intends to use for purposes of cross-examination on the grounds that it is not required by the Commission's procedures to disclose such documents, and on the grounds that the identity of such documents is protected by the work product privilege.

RESPECTFULLY SUBMITTED this 15th day of May, 2000.

HOPPING GREEN SAMS & SMITH, P.A.

By: Richard D. Melson  
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Attorneys for Seminole Electric Cooperative, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was furnished to the following parties by U.S. Mail or Hand Delivery (\*) this 15th day of May, 2000.

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*Thos O. R.*

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Attorney