

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint and petition by  
Lee County Electric Cooperative, Inc.  
for an investigation of the rate  
structure of Seminole Electric  
Cooperative, Inc.

Docket No. 981827-EC  
Filed: June 1, 2000

**ORIGINAL**

**LEE COUNTY ELECTRIC COOPERATIVE, INC.'S  
OBJECTIONS TO, AND REQUESTS FOR CLARIFICATION OF,  
SEMINOLE ELECTRIC COOPERATIVE, INC.'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Lee County Electric Cooperative, Inc. ("LCEC"), pursuant to Rule 28-106.206, Florida Administrative Code, Rule 1.350, Florida Rules of Civil Procedure, and the Order on Procedure issued in this docket on April 4, 2000, hereby submits its objections to, and requests for clarification of, Seminole Electric Cooperative, Inc.'s ("Seminole") First Request for Production of Documents.

**General Objections and Request for Clarification**

LCEC objects to each of the requests for production to the extent that they call for the production of privileged information, including privileged attorney-client communications, work product and trial preparation materials or other privileged information.

LCEC further objects to producing any documents which contain proprietary confidential business information. LCEC has not yet assembled and reviewed all documents called for in the requests. Thus, LCEC cannot determine at this time which specific requests may call for the production of

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proprietary confidential business information. Although some requests may call for the production of proprietary confidential business information, certain of that information may be made available to Seminole upon execution of an appropriate protective agreement, provided that disclosure of the information to Seminole will not harm LCEC. Counsel for Seminole should contact counsel for LCEC to arrange for the execution of such an agreement.

LCEC interprets all of Seminole's requests as excluding documents filed with the Florida Public Service Commission in this proceeding.

#### **Specific Objections and Requests for Clarification**

Request No. 2. LCEC requests clarification and narrowing of Request No. 2. LCEC objects to this request as vague, overbroad and irrelevant to the issues in this proceeding. For example, this request would require LCEC to produce all of its customer bills issued beginning in 1996 through 2000 since such bills are documents that relate to LCEC's retail rate schedules.

Request No. 3. LCEC requests clarification and narrowing of Request No. 3. LCEC objects to this request as vague, overbroad and irrelevant to the issues in this proceeding. For example, this request would require LCEC to produce all of its customer bills issued beginning in 1996 through 2000 since such bills are documents that relate to the wholesale rates or rate structure under which LCEC has taken or currently takes service from Seminole.

Request No. 4. LCEC interprets Request No. 4 to call for documents which relate to alternative wholesale rates or alternative wholesale rate structures for Seminole. To the extent that Seminole disagrees with this interpretation, LCEC objects to Request No. 4 as vague, overbroad, irrelevant to the issues in this proceeding, and incomprehensible.

Request No. 8. LCEC requests clarification and narrowing of Request No. 8. Request No. 8 appears to request the same information sought in Request No. 3. Moreover, LCEC objects to this request as vague, overbroad and irrelevant to the issues in this proceeding. For example, this request would require LCEC to produce all of its customer bills issued in 1998, 1999 and 2000 since such bills are documents that relate to Seminole's wholesale rates or rate structure.

Request No. 11. LCEC requests clarification and narrowing of Request No. 11. Request No. 11 appears to request the same information sought in Request No. 2. Moreover, LCEC objects to this request as vague, overbroad and irrelevant to the issues in this proceeding. For example, this request would require LCEC to produce all of its customer bills issued in 1998, 1999 and 2000 since such bills are documents that relate to LCEC's retail rate schedules.

Request No. 14. LCEC interprets Request No. 14 to exclude customer bills or customer notices relating to any load management policy or program of LCEC. To the extent that Seminole disagrees with this interpretation,

LCEC objects to Request No. 14 as vague, overbroad and irrelevant to the issues in this proceeding.

Request No. 18. LCEC interprets Request No. 18 as excluding documents exchanged between LCEC and other electric utilities which are unrelated to such other electric utilities supplying power, or proposing to supply power, to LCEC. To the extent that Seminole disagrees with this interpretation, LCEC objects to Request No. 18 as vague, overbroad and irrelevant to the issues in this proceeding.

Respectfully submitted,

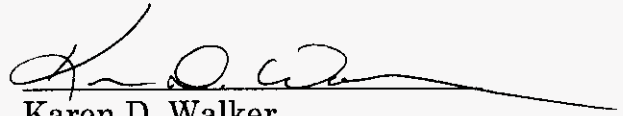


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**Attorneys for Lee County Electric  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by hand delivery to Richard Melson, Hopping, Green, Sams & Smith, P.A., 123 South Calhoun Street, Tallahassee, Florida 32301; and William Cochran Keating, Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850; and by United States Mail to Robert A. Mora, Allen Law Firm, Post Office Box 2111, Tampa, Florida 33601; and Timothy Woodbury, Seminole Electric Cooperative, Inc., Post Office Box 272000, Tampa, Florida 33688-2000 all on this 1st day of June, 2000.

  
Karen D. Walker

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