

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Determination)
of Need for an Electrical Power) DOCKET NO. 000442-EI
Plant in Polk County by Calpine)
Construction Finance Company, L.P.) FILED: OCTOBER 20, 2000
_____)

CALPINE CONSTRUCTION FINANCE COMPANY'S OBJECTIONS TO
STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-5)

Calpine Construction Finance Company, L.P., ("Calpine"), pursuant to the schedule proposed by Calpine in its pending motion for revised procedural schedule filed with the Commission on September 26, 2000, hereby respectfully submits its objections to the Staff of the Florida Public Service Commission's ("Staff") First Request for Production of Documents (Nos. 1-5) ("Staff's First Requests to Produce") which were served on Calpine on October 13, 2000.

GENERAL OBJECTIONS

Calpine objects to Staff's First Requests to Produce on the grounds set forth in paragraphs A and B below. Each of Calpine's responses will be subject to and qualified by these general objections.

A. Calpine 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

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later determined to be applicable for any reason. Calpine in no way intends to waive any such privilege or protection.

B. Calpine objects to any interrogatory to the extent that it calls for confidential, proprietary business information and/or the compilation of information that is considered confidential, proprietary business information.

SPECIFIC OBJECTIONS

Calpine makes the following specific objections to Staff's First Request to Produce. Calpine's specific objections are numbered to correspond with the numbering of Staff's request to produce.

1. Calpine objects to this request to produce to the extent that it seeks documents containing confidential, proprietary business information. Certain internal documentation used by Calpine to develop the economic and financial assumptions used to evaluate the Osprey Energy Center may contain information that is competitively sensitive, confidential, proprietary business information of Calpine or its affiliates. Calpine will attempt to respond with non-confidential, non-proprietary documentation.

2. Calpine objects to this request to produce to the extent that it seeks documents containing confidential, proprietary business information. Certain reports or analyses prepared by investors' evaluation services or investment banking

firms may contain information that is competitively sensitive, confidential, proprietary business information of Calpine, its affiliates, or the investment companies, or of all affected entities. Calpine will attempt to respond with non-confidential, non-proprietary public documents.

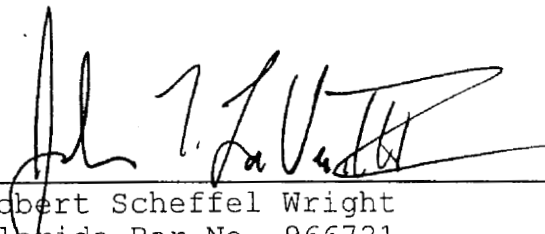
3. Calpine objects to this request to produce to the extent that it seeks documents containing confidential, proprietary business information. Certain reports or analyses prepared by investors' evaluation services or investment banking firms may contain information that is competitively sensitive, confidential, proprietary business information of Calpine, its affiliates, or the investment companies, or of all affected entities. Calpine will attempt to respond with non-confidential, non-proprietary public documents.

4. Calpine objects to this request to produce to the extent that it seeks documents containing confidential, proprietary business information. Certain reports or analyses prepared by investors' evaluation services or investment banking firms may contain information that is competitively sensitive, confidential, proprietary business information of Calpine, its affiliates, or the investment companies, or of all affected entities. Calpine will attempt to respond with non-confidential, non-proprietary public documents.

5. Calpine objects to this request to produce to the extent that it seeks documents containing confidential,

proprietary business information. Documents related to Calpine's construction revolver may contain information that is competitively sensitive, confidential, proprietary business information of Calpine or its affiliates, or of the lenders involved in the construction revolver arrangement. Calpine will attempt to respond with non-confidential, non-proprietary public documents.

Respectfully submitted this 20th day of October, 2000.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery (*), facsimile transmission (**), or U.S. Mail, on this 20th day of October, 2000, to the following:

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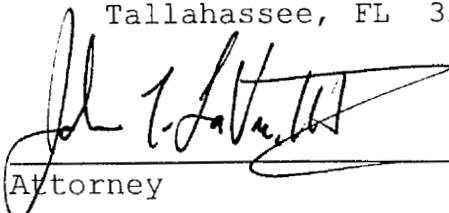
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