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February 15, 2002

HAND DELIVERY

Ms. Blanca S. Bayo, Director Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, Florida 32399-0850

> Re: Docket No. 001148-EI

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and seven copies of Florida Power & Light Company's Notice of Service of Responses to South Florida Hospital and Healthcare Association's Seventh Set of Interrogatories (Nos. 64-74) and Response to South Florida Hospital and Healthcare Association's Seventh Set of Requests for Production of Documents (Nos. 57-64).

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,

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## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of the retail rates of	)	Docket No. 001148-EI
Florida Power & Light Company.	)	Dated: February 15, 2002
	)	

FLORIDA POWER & LIGHT COMPANY'S NOTICE OF SERVICE
OF RESPONSES TO SOUTH FLORIDA HOSPITAL AND HEALTHCARE
ASSOCIATION'S SEVENTH SET OF INTERROGATORIES (NOS. 64-74)
AND RESPONSE TO SOUTH FLORIDA HOSPITAL AND HEALTHCARE
ASSOCIATION'S SEVENTH SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS (NOS. 57-64)

Florida Power & Light Company ("FPL"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rules 1.340 and 1.350, Florida Rules of Civil Procedure, hereby respondes as follows to South Florida Hospital and Healthcare Association's ("SFHHA") Seventh Sets of Interrogatories (Nos. 64-74) and Requests for Production of Documents (Nos. 57-64).

## Introduction

FPL incorporates its prior objections and clarifications served on February 5, 2002. FPL's responses referenced herein are without waiver of those prior objections and clarifications. All documents marked confidential shall be subject to a confidentiality order or a confidentiality agreement between FPL and SFHHA, and shall only be produced subject to such order or agreement.

# Responses to Requests for Documents (Nos. 57-64)

The documents responsive to the foregoing Requests for Documents as to which FPL has not raised an objections will be produced during regular business hours, 8:00 a.m. to 5:00 p.m., at FPL's General Office, 9250 West Flagler Street, Miami, Florida, upon reasonable notice to FPL's counsel, Rutledge, Ecenia, Purnell & Hoffman, P.A.

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# Answers to Interrogatories (Nos. 64-74)

Attached hereto are FPL's answers to the foregoing Interrogatories and the Affidavits of the persons providing said answers, with the exceptions of answers to SFHHA Interrogatory Nos. 70 and 73 which remain subject to objections filed by FPL on February 5, 2002.

Respectfully submitted,

Kenneth A. Hoffman Esq.

Rutledge, Ecenia, Purnell & Hoffman, P.A.

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Attorneys for Florida Power & Light Company

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Notice of Service of Responses to SFHHA's Seventh Set of Interrogatories (Nos. 64-74) and Response to SFHHA's Seventh Set of Requests for Production of Documents (Nos. 57-64) was furnished by overnight delivery(\*) or United States Mail this 15th day of February, 2002, to the following:

Robert V. Elias, Esq. Legal Division Florida Public Service Commission 2540 Shumard Oak Boulevard Room 370 Tallahassee, FL 32399-0850

Thomas A. Cloud, Esq. Gray, Harris & Robinson, P.A. 301 East Pine Street, Suite 1400 Orlando, Florida 32801

Michael B. Twomey, Esq. Post Office Box 5256 Tallahassee, FL 32314-5256

Joseph A. McGlothlin, Esq. Vicki Gordon Kaufman, Esq. McWhirter Reeves 117 South Gadsden Tallahassee, Florida 32301

Linda Quick South Florida Hospital & Healthcare Asso. 6363 Taft Street Hollywood, FL 33024 Florida Industrial Power Users Group c/o John McWhirter, Jr., Esq. McWhirter Reeves 400 North Tampa Street, Suite 2450 Tampa, FL 33601-3350

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