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RECORDS AND REPORTING  
November 9, 1998

Charles A. Guyton  
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Blanca S. Bayó, Director  
Records and Reporting  
Florida Public Service Commission  
4075 Esplanade Way, Room 110  
Tallahassee, Florida 32399-0850

By Hand Delivery

**In re: Joint Petition for Determination of Need for an Electrical Power Plant in Volusia County by the Utilities Commission, City of New Smyrna Beach, Florida, and Duke Energy New Smyrna Beach Power Company Ltd., L.L.P.  
Docket No. 981042-EM**

Dear Ms. Bayo:

Enclosed please find the original and fifteen (15) copies of Florida Power & Light Company's Objections to Petitioners' First Set of Interrogatories (Nos. 1-14) to Florida Power & Light Company in Docket No. 981042-EM.

If you or your Staff have any questions regarding this filing, please contact me.

Very truly yours,

*Charles A. Guyton*  
Charles A. Guyton

- ACK \_\_\_\_\_
- AFA 2 \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG Futrell \_\_\_\_\_
- LEG 3 \_\_\_\_\_
- LIN 5 \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

Enc.  
cc: Counsel for all parties of record

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*[Signature]*  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
12603 NOV-98  
FPSC-RECORDS/REPORTING

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Joint Petition for Determination of Need )  
for an Electrical Power Plant in Volusia County ) DOCKET NO. 981042-EM  
by the Utilities Commission, City of New Smyrna )  
Beach, Florida, and Duke Energy New Smyrna ) DATE: November 9, 1998  
Beach Power Company Ltd., L.L.P. )

**Florida Power & Light Company's  
Objections to Petitioners' First Set Of Interrogatories**

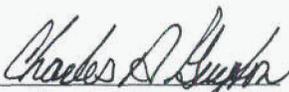
Florida Power & Light Company ("FPL"), pursuant to the Order Establishing Procedures issued in this docket on September 4, 1998, hereby respectfully submits its objections to Petitioner's First Set of Interrogatories to FPL which were served on FPL on October 30, 1998.

11. FPL objects to this interrogatory as irrelevant and immaterial and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving its objection as to its affiliates and parents, FPL will answer the interrogatory as to FPL.

Respectfully submitted,

Steel Hector & Davis LLP  
Suite 601, 215 S. Monroe St.  
Tallahassee, Florida 32301

Attorneys for Florida Power &  
Light Company

By:   
Charles A. Guyton

DOCUMENT NUMBER-DATE

12603 NOV-98

FPSC-RECORDS/REPORTING

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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Florida Power & Light Company's Objections to Petitioners' First Set of Interrogatories (Nos. 1-14) in Docket No. 981042-EM was served by Hand Delivery (when indicated with an \*) or mailed this 9 day of November, 1998 to the following:

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By:   
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