



February 12, 1999

Ms. Blanca Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0950

RE: Docket Nos.: 97100⁴X-EG

Dear Ms. Bayo:

Enclosed, for filing in the dockets referenced above, are the original and ten copies of LEAF's Third Set of Interrogatories to Florida Power and Light and LEAF's Third Request for Production to Florida Power and Light.

Please document this filing by stamping the attached copy of this letter and returning it to me. Thank you for your assistance in this matter. If you have questions, please let me know.

Sincerely,

Debra Swim

Debra Swim
Senior Attorney
Energy Advocacy Project

- ACK _____
- APA _____
- APP _____
- CAF _____ Enclosures
- CMU _____
- CTR _____
- EPG _____
- LE _____
- LI _____
- OP _____
- RC _____
- SE _____
- WPS _____
- YTH _____

RECEIVED
87 8 31 66

Public Interest DOCUMENT NUMBER-DATE

Interess
DOCUMENT NUMBER-DATE

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Adoption of Numeric Conservation
Goals for Florida Power & Light Company

DOCKET NO.: 971004-EG

LEAF'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS
TO FLORIDA POWER & LIGHT COMPANY

Intervenor, Legal Environmental Assistance Foundation, Inc., ("LEAF"), pursuant to Rule 28-106.206, Florida Administrative Code (FAC), and Florida Rules of Civil Procedure 1.350 and 1.280, hereby serves the following Request for Production of Documents on Florida Power and Light Company ("FPL").

Please produce for purposes of inspection and copying, the following documents at LEAF, 1114 Thomasville Road, Suite E, Tallahassee, Florida 32303, not later than 30 days after service of this request:

1. All documents identified in the Company's response to Interrogatory number 80 of LEAF's Third Set of Interrogatories to Florida Power and Light Company.
2. All documents identified in the Company's response to Interrogatory number 82 of LEAF's Third Set of Interrogatories to Florida Power and Light Company.
3. All documents identified in the Company's response to Interrogatory number 85 of LEAF's Third Set of Interrogatories to Florida Power and Light Company.
4. All documents identified in the Company's response to Interrogatory number 86 of LEAF's Third Set of Interrogatories to Florida Power and Light Company.
5. All documents identified in the Company's response to Interrogatory number 87 of LEAF's Third Set of Interrogatories to Florida Power and Light Company.

By: Debra Swim
Debra Swim, Esquire
Legal Environmental
Assistance Foundation, Inc.
1114 Thomasville Road, Suite E
Tallahassee, Florida 32303
(904) 681-2591

DOCUMENT NUMBER-DATE

~~01914~~ FEB 15 98

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of LEAF's Third Request for Production of Documents to FPL was hand delivered (when indicated by *) or mailed this 12th day of February, 1999 to:

Leslie Paugh, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0950

Jack Shreve, Esq.
Office of Public Counsel
111 W. Madison
Tallahassee, FL 32399-1400

Vicki Kaufman, Esq.
117 S. Gadsden St.
Tallahassee, FL 32301

Charles A. Guyton, Esq.*
Steel, Hector & Davis
215 S. Monroe St., Suite 601
Tallahassee, FL 32301-1804

John McWhirter, Esq.
P.O. Box 3350
Tampa, FL 33601

Jeffrey A. Stone, Esq.
Beggs & Lane
P.O. Box 12950
Pensacola, FL 32576-2950

Lee L. Willis, Esq.
James D. Beasley, Esq.
Ausley & McMullen
227 South Calhoun St.

James A. McGee, Esq.
Florida Power Corporation
P.O. Box 14042
St. Petersburg, FL 33733

Mollie Lampi, Esq.
Pace University Energy Project
122 S. Swan Street
Albany, NY 12110



Debra Swim, Esq.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of LEAF's Third Request for Production of Documents to FPL was hand delivered (when indicated by *) or mailed this 12th day of February, 1999 to:

Leslie Paugh, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0950

Jack Shreve, Esq.
Office of Public Counsel
111 W. Madison
Tallahassee, FL 32399-1400

Vicki Kaufman, Esq.
117 S. Gadsden St.
Tallahassee, FL 32301

Charles A. Guyton, Esq.*
Steel, Hector & Davis
215 S. Monroe St., Suite 601
Tallahassee, FL 32301-1804

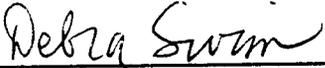
John McWhirter, Esq.
P.O. Box 3350
Tampa, FL 33601

Jeffrey A. Stone, Esq.
Beggs & Lane
P.O. Box 12950
Pensacola, FL 32576-2950

Lee L. Willis, Esq.
James D. Beasley, Esq.
Ausley & McMullen
227 South Calhoun St.

James A. McGee, Esq.
Florida Power Corporation
P.O. Box 14042
St. Petersburg, FL 33733

Mollie Lampi, Esq.
Pace University Energy Project
122 S. Swan Street
Albany, NY 12110



Debra Swim, Esq.