

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

LEE COUNTY ELECTRIC COOPERATIVE, INC.'S FIRST REQUEST FOR ADMISSIONS TO		AND AND	hith Wd	Set :
for an investigation of the rate structure of Seminole Electric Cooperative, Inc.)	맞는 유민	4-4	
In Re: Complaint and petition by Lee County Electric Cooperative, Inc.) Docket No. 981827	- E	00 MA	S

Petitioner, LEE COUNTY ELECTRIC COOPERATIVE, INC. ("LCEC"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.370, Florida Rules of Civil Procedure, hereby propounds the following request for admissions on SEMINOLE ELECTRIC COOPERATIVE, INC., to be answered within the time prescribed by Florida Rules of Civil Procedure.

SEMINOLE ELECTRIC COOPERATIVE, INC.

DEFINITIONS

- 1. "Seminole" means Seminole Electric Cooperative, Inc. and includes all of its employees, agents, divisions, affiliates and any person or entity acting for or on the behalf of Seminole in any capacity.
- 2. "Rate Schedule" means the Seminole's Wholesale Service Rate to Members Rate Schedule SECI-7, and Rate Schedule SECI-7b.

REQUEST FOR ADMISSIONS

LCEC requests that Seminole admit the truth of the following:

- 1. Seminole is a rural electric cooperative.
- 2. Seminole owns, maintains or operates an electric generation system in

Florida.

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- 3. Seminole owns, maintains, or operates an electric transmission system in Florida.
- 4. Seminole is an "electric utility" as that term is defined in Section 366.02(2), Florida Statutes.
- 5. The Rate Schedule was developed by Seminole without a cost of service study.

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., Post Office Box 6526, Tallahassee, Florida and William Cochran Keating and David Wheeler, 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; Mr. Timothy Woodbury, Seminole Electric Cooperative, Inc., Post Office Box 272000, Tampa, Florida 33688-2000; John Noland, Henderson, Franklin, et al., Post Office Box 280, Ft. Myers, Florida 33902; and Mr. Frank Wilkerson, Post Office Box 3455 North Ft.

Myers, Florida 33918-3455 all on this 4th day of May, 2000.

D. Bruce May

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