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Matthew M. Childs, P.A.

March 5, 1999

Ms. Blanca S. Bayó, Director  
Division of Records and Reporting  
Florida Public Service Commission  
4075 Esplanade Way, Room 110  
Tallahassee, FL 32399-0850

RE: DOCKET NO. 981246-EI

Dear Ms. Bayó:

Enclosed for filing please find Florida Power & Light Company's Response to Staff's First Request for Production of Documents (Nos. 1-13) in the above referenced docket.

Very truly yours,



Matthew M. Childs, P.A.

MMC/ml

- ACK \_\_\_\_\_
- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
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DOCUMENT NUMBER-DATE  
02888 MAR -5 99  
FPSC RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Florida )  
Power & Light Company for Approval )  
Annual Accrual for its ) DOCKET NO. 981246-EI  
Turkey Point and St. Lucie Nuclear ) DATE: MARCH 5, 1999  
Decommissioning Unit Costs )  
\_\_\_\_\_ )

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

Florida Power & Light Company hereby responds to Staff's First Request for Production of Documents (Nos. 1-13) and has filed and served its Notice of Service with respect thereto. FPL will make a copy of the documents to be produced available to the FPSC Staff for inspection during normal business hours at the offices of Steel Hector & Davis LLP, 215 South Monroe Street, Suite 601, Tallahassee, Florida, 32301, on March 5, 1999 or such other date as is convenient. Also, as agreed to with the FPSC Staff, some of the documents within the scope of the request are technical drawings associated with Request No. 7 and are voluminous, and as discussed with Staff, these documents are not being produced. A portion of the document responsive to Request No. 8 (the contract with Chem Nuclear Systems L.L.C.) will be available subject to arrangements to address confidentiality and to determine if there is further need for them.

  
\_\_\_\_\_  
Matthew M. Childs, P.A.  
Steel Hector & Davis  
215 South Monroe Street  
Suite 601  
Tallahassee, FL 32301  
Attorneys for Florida Power  
& Light Company

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 981246-EI**

**I HEREBY CERTIFY** that a true and correct copy of Florida Power & Light Company's Response to Staff's First Request for Production of Documents (Nos. 1-13) has been furnished by Hand Delivery this 5th day of March, 1999, to the following:

Robert V. Elias, Esq.  
Legal Division  
FPSC  
2540 Shumard Oak Boulevard  
Gunter Building, Room 370  
Tallahassee, FL 32399-0872

By:   
Matthew M. Childs, P.A.