

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Complaint and petition by)	
Lee County Electric Cooperative, Inc.)	Docket No. 981827-EC
For an investigation of the rate structure)	
of Seminole Electric Cooperative, Inc.)	Filed: June 21, 2000
_____)		

**LEE COUNTY ELECTRIC COOPERATIVE, INC.'S OBJECTIONS AND RESPONSES
 TO SEMINOLE ELECTRIC COOPERATIVE, INC.'S
 FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 1 to 19)
TO LEE COUNTY ELECTRIC COOPERATIVE, INC.**

LEE COUNTY ELECTRIC COOPERATIVE, INC. ("LCEC") hereby serves its
 Objections and Responses to SEMINOLE ELECTRIC COOPERATIVE, INC. ("Seminole"s)
 First Request for Production of Documents (Nos. 1 to 19).

OBJECTIONS

LCEC hereby renews all objections made in its Objections to, and Requests for Clarification of, Seminole's First Request for Production of Documents filed in this docket on June 1, 2000. Documents that have been withheld on the basis of privilege or work product are described in separate correspondence to be hand-delivered to counsel for Seminole on or before June 26, 2000. For purposes of the following responses, LCEC has interpreted the requests in accordance with its understanding of the requests as set forth in the June 1, 2000 filing.

RESPONSES

1. All retail rate schedules to LCEC's members in effect during the years 1996, 1997, 1998, 1999 and 2000.

RESPONSE: Produced herewith.

DOCUMENT NUMBER-DATE
 07582 JUN 21 8 248
 FPSC-RECORDS/REPORTING

2. All cost of service studies, cost analyses, workpapers, or any other documents, including all workpapers, prepared by LCEC or any other person or entity on LCEC's behalf, which relate to LCEC's retail rate schedules in effect during the years 1996 through 2000.

RESPONSE: Produced herewith as Protected Materials under the Protective Agreement dated June 9, 2000.

3. All cost of service studies, cost analyses, workpapers or any other documents prepared by LCEC or any other person or entity on LCEC's behalf during 1996 through 2000, which relate to the wholesale rates or rate structure under which LCEC has taken or currently takes service from Seminole.

RESPONSE: Produced herewith as Protected Materials under the Protective Agreement dated June 9, 2000.

4. All cost of service studies, cost analyses, workpapers or any other documents prepared by LCEC or any other person or entity on LCEC's behalf during 1996 through 2000, which relate to alternatives to the wholesale rates or rate structure under which LCEC has taken, currently takes, or proposes to take service from Seminole.

RESPONSE: Produced herewith as Protected Materials under the Protective Agreement dated June 9, 2000 (with the exception of documents filed with the FPSC which are not Protected Materials).

5. All retail rate structure filings, including any related testimony or cost studies, made by LCEC with the FPSC during the years 1996 through 2000.

RESPONSE: Produced herewith.

6. LCEC's Annual Report for 1999.

RESPONSE: Produced herewith.

7. All documents related to any strategic plans considered or approved by LCEC's Board of Trustees during 1998, 1999, or 2000.

RESPONSE: Produced herewith as Protected Materials under the Protective Agreement dated June 9, 2000.

8. All documents prepared in 1998, 1999, 2000 related to Seminole's wholesale rates or rate structure.

RESPONSE: Included in responses to Request Nos. 3 and 4.

9. All documents, including overhead slides, utilized for any LCEC Board of Trustees meeting during the years 1998, 1999 and 2000 related to wholesale electric service from Seminole.

RESPONSE: Included in responses to Request Nos. 3, 4 and 5.

10. Minutes and all meeting notes from each LCEC Board of Trustees meeting during 1998, 1999 and 2000 which relate to wholesale electric service from Seminole.

RESPONSE: Relevant portions of the minutes and meeting notes are produced herewith as Protected Materials under the Protective Agreement dated June 9, 2000.

11. All documents prepared in 1998, 1999, 2000 related to LCEC's retail rates or rate structure.

RESPONSE: Included in responses to Request Nos. 1, 2, and 5.

12. All documents, including overhead slides, utilized for any LCEC Board of Trustees meeting during the years 1998, 1999 and 2000 related to LCEC's retail rates or rate structure.

RESPONSE: Produced herewith as Protected Materials under the Protective Agreement dated June 9, 2000 and also included in responses to Request Nos. 3 and 4.

13. Minutes and all meeting notes from each LCEC Board of Trustees meeting during 1998, 1999 and 2000 which relate LCEC's retail rates or rate structure.

RESPONSE: Included in response to Request No. 10.

14. All documents prepared during the years 1996 through 2000 relating to any load management policy or program of LCEC.

RESPONSE: Produced herewith and included in response to Request Nos. 3 and 5.

15. All documents prepared during the years 1996 through 2000 by LCEC or by other third parties on LCEC's behalf relating to Seminole's power supply plans.

RESPONSE: Included in response to Request No. 4.

16. All studies or other documents prepared by LCEC or by a third party on LCEC's behalf relating to the economic justification for incremental additions of load management on the LCEC system during the period of 1996 through 2000.

RESPONSE: Included in responses to Request Nos. 3 and 5.

17. For 1999, the annual and monthly load factors for each customer included in LCEC's large commercial customer class. (Specific customer names may be redacted for confidentiality.)

RESPONSE: There are no responsive documents.


18. All documents exchanged between LCEC and power suppliers, other than Seminole, during the years 1996 through 2000.

RESPONSE: There are no responsive documents.

19. All documents identified in response to Interrogatory No. 16.

RESPONSE: There are no responsive documents.

DATED this 21st day of June, 2000.

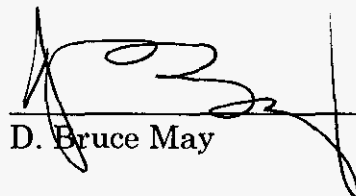


D. Bruce May
Florida Bar No. 354473
Karen D. Walker
Florida Bar No. 0982921
Holland & Knight LLP
Post Office Drawer 810
Tallahassee, Florida 32302
(850) 224-7000

**Attorneys for Lee County Electric
Cooperative, Inc.**

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., 123 South Calhoun Street, Tallahassee, Florida 32301; and a true and correct copy of the foregoing was provided via hand-delivery to 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; and Timothy Woodbury, Seminole Electric Cooperative, Inc., Post Office Box 272000, Tampa, Florida 33688-2000 all on this 21st day of June, 2000.



D. Bruce May

TAL1 #219389 v1