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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination of Need of Hines Unit 3 Power Plant.	))))	Docket No.: 020953-EI Submitted for Filing: October 7, 2002

FLORIDA POWER'S OBJECTIONS AND RESPONSES
TO STAFF'S FIRST SET OF INTERROGATORIES

Pursuant to § 350.0611(1), Fla. Stat. (2000), Fla. Admin. Code R. 28-106.206, and Fla. R. Civ. P. 1.340, Florida Power Corporation ("FPC") objects and responds to the Staff of the Florida Public Service Commission's First Set of Interrogatories (Nos. 1-33) and states as follows:

GENERAL OBJECTIONS

FPC objects to any interrogatory that calls for information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time the response is first made to these interrogatories or is later determined to be applicable based on the discovery of documents, investigation or analysis. FPC in no way intends to waive any such privilege or protection.

In certain circumstances, FPC may determine upon investigation and analysis that information responsive to certain interrogatories to which objections are not otherwise asserted are confidential and proprietary and should be produced only under an appropriate confidentiality agreement and protective order, if at all. By agreeing to provide such information in response to such interrogatory, FPC is not waiving its right to insist upon appropriate protection of confidentiality by means of a confidentiality agreement and protective order. FPC hereby asserts its right to require such protection of any and all documents that may qualify for protection under the Florida Rules of Civil Procedure and other applicable statutes, rules and legal principles.

FPC objects to these interrogatories and any definitions and instructions that purport to expand FPC's obligations under applicable law.

FPC also objects to these interrogatories to the extent they purport to require FPC to prepare information in a particular format or perform calculations not previously prepared or performed as an attempt to expand FPC's obligations under applicable law. Further, FPC objects to these interrogatories to the extent they purport to require FPC to conduct an analysis or create information not prepared by FPC in the normal course of business. FPC will comply with its obligations under the applicable rules of procedure.

FPC incorporates by reference all of the foregoing general objections into each of its specific objections set forth below as though pleaded therein.

In addition, FPC reserves its right to count interrogatories and their sub-parts (as permitted under the applicable rules of procedure) in determining whether it is obligated to respond to additional interrogatories served by any party.

INTERROGATORIES

1. Please provide a schedule which shows the actual common equity ratio for Progress Energy Company and each of its subsidiaries for fiscal years 1999, 2000, and 2001. For purposes of this response, the actual equity ratio is calculated by dividing total common equity by the sum of total common equity, preferred stock, long-term debt, and short-term debt. Show all amounts used in the calculations. Sum of the total equity for the subsidiaries should reconcile with the total equity for Progress Energy Company.

Pursuant to the agreement of counsel, Florida Power is not obligated to respond to this interrogatory.

2. For the years 1999, 2000, and 2001, what was the adjusted equity ratio for Florida Power Corporation and Progress Energy Company on a consolidated basis. For purpose of this response, the adjusted equity ratio is calculated by dividing total common equity by the sum of total common equity, preferred stock, long-term debt, short-term debt, and an estimate of its off-balance sheet debt equivalent. Show all amounts used in the calculations.

Pursuant to the agreement of counsel, Florida Power is not obligated to respond to this interrogatory.

3. For the years 1999, 2000, and 2001, please provide schedules which show the estimated amount of the off-balance sheet debt equivalent for Florida Power Corporation. For purposes of this response, these schedules should itemize the projected capacity payment stream for each of the company's primary purchased power contracts (smaller QF contracts may be lumped together), the discounted present value amount at a 10% discount rate, the respective Standard & Poor's risk adjustment factors, the adjusted debt equivalent value of each contract, and the total amount of Florida Power Corporation's estimate of its off-balance sheet debt equivalent for each year.

Pursuant to the agreement of counsel, Florida Power is not obligated to respond to this interrogatory.

4. Please discuss in detail the reasonableness of the financial assumptions relied upon in Florida Power Corporation's need determination filing.

Pursuant to the agreement of counsel, Florida Power is not obligated to respond to this interrogatory.

5. Please discuss in detail the reasonableness of the tax positions Florida Power Corporation has assumed in its need determination filing.

Pursuant to the agreement of counsel, Florida Power is not obligated to respond to this interrogatory.

6. Who will be the natural gas supplier for the project?

Please refer to the Direct Testimony of Pamela R. Murphy, page 9 of 11, lines 3 through 10 and page 10 of 11, lines 21 through 23.

7. Does Florida Power Corporation have any signed contracts for the supply of natural gas at this time? If not, when do you expect to have them?

Please refer to the Direct Testimony of Pamela R. Murphy, page 9 of 11, lines 3 through 10, and lines 16 through 18.

8. What are the required volumes of natural gas to serve the project?

Please refer to the Direct Testimony of Pamela R. Murphy, page 7 of 11, line 22 through page 8 of 11, line 3.

9. What is the capacity of the pipeline that will serve the project?

The Hines site is served by both Gulfstream Natural Gas and Florida Gas Transmission. The Gulfstream lateral to the site has a capacity of 300,000 Dt/day and the FGT lateral has a capacity of 115,000 Dt/day, expandable to 230,000 Dt/day.

10. What is the anticipated in-service date for the natural gas supply for the project?

Please refer to the Direct Testimony of Pamela R. Murphy, page 9 of 11, lines 14 through 18.

11. Provide a Present Worth Revenue Requirements (PWRR) analysis for each expansion plan evaluated in Florida Power Corporation's RFP process. Include separate PWRR analyses for each plan resulting from the self-build option selected from the RFP process, and all respondents to the RFP. For each year in the evaluation period, provide the annual and cumulative PWRR for each of the following components: generation capital, generation fixed O&M, generation non-fuel variable O&M, transmission capital, transmission fixed O&M, transmission non-fuel variable O&M, system fuel, purchased power, and total costs.

Reference Attachment.

Note: A majority of the information in this attachment is confidential and has been redacted. The complete response has been filed confidentially with a Notice of Intent to seek confidential classification.

12. Provide a side-by-side annual comparison, listing megawatts, units, and reserve margin, of the expansion plan resulting from the self build option selected from Florida Power's RFP process and the expansion plan resulting from the self-build option identified in each RFP respondent's proposal. The time period should be identical to the PWRR analysis requested in interrogatory eleven.

Reference Attachment.

13. Explain in detail how each RFP response which included power purchases of shorter term than the depreciable life of the selected self-build option were evaluated on a comparable basis with Florida Power Corporation's self-build options.

As explained in the Direct Testimony of Daniel J. Roeder on page 40, line 21 through page 41, line 10, the cost impacts of the changes in the resource plan were reflected in the financial analysis by way of an economic carrying charge, which is the same concept as the Value of Deferral. Each Greenfield proposal received a credit for fixed cost savings equal to the economic carrying charge of a generic combined cycle unit (the unit being deferred in the Base Case resource plan) through the term of the proposal. The economic carrying charge captured both the construction costs and fixed O&M. The System Power proposal (Bid E) received similar credits for the deferral of two combined cycle units for one year each; however, the additional cost of advancing a combustion turbine three years was also assigned to the proposal.

14. Explain in detail how the cost of existing land and infrastructure was incorporated into Florida Power Corporation's self-build option selected from the RFP process, and how it was incorporated for all respondents to the RFP.

The cost of existing land and infrastructure is irrelevant in an economic analysis of Hines 3 or any other proposal received in the RFP since it is a sunk cost.

15. Describe the transmission upgrades necessary for Florida Power Corporation's self-build option selected from the RFP process, and all respondents to the RFP. Also include how these upgrades were developed and a list of the staff involved.

Transmission impact studies were conducted only for greenfield proposals making it to the Short List. Following is a discussion of the transmission upgrades required for Bidders C, D, F, and the Hines 3 self-build option.

Bidder C

The first type of analysis employed to determine any potential need for transmission upgrades due to the proposed interconnection of Bidder C was load flow analysis. The purpose of the load flow analysis was to study current flow and voltage conditions on the transmission system with and without the Bidder C site. Normal condition and single contingency analysis was performed for these scenarios. Contingencies showing single loading increases of 3% or greater for a Bidder C dispatch versus the base case were considered significant overloads that merited further research and discussion with the affected entities. BEGIN CONFIDENTIAL [redacted] END CONFIDENTIAL

Stability analysis was also performed to analyze the potential effects of the interconnection of Bidder C in relation to major events on the transmission system. The typical events that are simulated for this type of analysis include tripping of a generator, loss of an entire generation site or loss of one or more major transmission lines (e.g. 230 kV lines). BEGIN CONFIDENTIAL [redacted] END CONFIDENTIAL

Short circuit analysis was performed BEGIN CONFIDENTIAL [redacted] END CONFIDENTIAL to determine the impact of Bidder C on existing circuit breaker duties. This consisted of the application of a 3-phase fault applied to the pertinent bus with Bidder C out of service, followed by repetition of the fault with Bidder C in-service. In these simulations, BEGIN CONFIDENTIAL [redacted] END CONFIDENTIAL

BEGIN CONFIDENTIAL [redacted] END CONFIDENTIAL

Bidder D

As described previously, load flow analysis was also performed for Bidder D. BEGIN CONFIDENTIAL [redacted] END CONFIDENTIAL

As described previously, stability analysis was also performed for Bidder D. BEGIN CONFIDENTIAL [redacted]

END CONFIDENTIAL

As described previously, short circuit analysis was also performed for Bidder D. BEGIN CONFIDENTIAL [redacted] END CONFIDENTIAL

BEGIN CONFIDENTIAL [redacted] END CONFIDENTIAL

Bidder F

As described previously, load flow analysis was also performed for Bidder F. BEGIN CONFIDENTIAL [redacted] END CONFIDENTIAL

As described previously, stability analysis was also performed for Bidder F. BEGIN CONFIDENTIAL [redacted] END CONFIDENTIAL

As described previously, short circuit analysis was also performed for Bidder F. BEGIN CONFIDENTIAL [redacted] END CONFIDENTIAL

BEGIN CONFIDENTIAL [redacted] END CONFIDENTIAL

Self-Build

As described previously, load flow analysis was also performed for the Hines 3 self-build option. No normal condition or contingency overloads were encountered based on the monitoring of all facilities in the vicinity of the Hines 3 site.

As described previously, load flow analysis was also performed for the Hines 3 self-build option. Hines 3 was not shown to cause scenarios of instability in this analysis.

As described previously, short circuit analysis was also performed for the Hines 3 self-build option. In these simulations, with and without Hines 3 dispatched, the Hines 3 self-build option was not found to have a detrimental effect on fault current scenarios. As such, Hines 3 would have no cost responsibility for upgrading breakers.

Based on all analysis conducted, no transmission facility modifications other than the expansion of Hines Substation would be necessary to accommodate the interconnection of Hines 3.

Staff Involved

Bart White, formerly of Transmission Planning but employed in Suncoast Transmission Maintenance as of May 20, 2002, performed the analysis and identified any potential transmission upgrades required to accommodate the interconnection of the bidders or the self-build option. Fred McNeill of Transmission Planning performed load flow calculations but did not analyze those calculations.

16. Provide a breakdown of all transmission-related costs associated with Florida Power Corporation's self-build option selected from the RFP process, and all respondents to the RFP.

Following is a list of Bids received and the annual transmission charges (nominal dollars) reflected in each proposal:

Bidder	Transmission Charges ($/kW-Yr.) BEGIN CONFIDENTIAL
A	[redacted]
B	[redacted]
C	[redacted]
	[redacted]
	[redacted]
	[redacted]
	[redacted]

[redacted]

END CONFIDENTIAL

The following breakdown reflects transmission cost impacts based on the transmission impact studies. These studies were based on proposals, which were included on the short list (Bidders C, D, and F, and the Hines 3 self-build option).

<u>Bidder C</u>

BEGIN CONFIDENTIAL [redacted]

END CONFIDENTIAL

Bidder D

BEGIN CONFIDENTIAL [redacted] END CONFIDENTIAL

Bidder F

BEGIN CONFIDENTIAL [redacted] END CONFIDENTIAL

Self-Build

While no required transmission upgrades were found to be necessary in load flow simulations with Hines 3 dispatched, base interconnection requirements for the plant and costs are estimated as follows: Hines Substation expansion - **$4,500,000**.

17. Explain in detail how Florida Power Corporation incorporated the cost of emission credits associated with the self-build option selected from the RFP process, and all respondents to the RFP.

The cost of emission credits was incorporated into the production cost for the self-build option selected from the RFP process by inputting a \$/ton cost for SO_2 emissions. For all respondents to the RFP, the cost of emission credits was assumed to be zero, as the respondents to the RFP incorporated the cost of emission credits into the price of their respective bids.

18. Discuss in detail whether Florida Power Corporation's 2002 RFP permitted a respondent to construct an electric generating unit on property owned by Florida Power Corporation. If so, provide a brief description of any such proposal including a discussion of how it was evaluated.

Florida Power's 2002 RFP did not address whether a respondent could construct an electric generating unit on property owned by Florida Power. In response to a question from a potential bidder to whether a bidder could propose to build on the Hines site, Florida Power's response was that it was predisposed to saying no, but if a Bidder wanted to make a proposal, it should go ahead and make the proposal. One bidder mentioned in the cover letter to their proposal that they were interested in providing an alternative to allow their facility to be sited at Hines; however, no alternative was ever provided to Florida Power.

19. Provide a time line with milestones for Florida Power Corporation's 2001 generation planning activities.

Florida Power's 2001 Generation Planning Activities	
Jan-Mar 2001	Gather data and forecasts, and perform the analysis required to develop Florida Power's resource plan, Ten Year Site Plan, and EIA-411 submittal.
Mar-2001	EIA-411 Data Request filed with the FRCC
Apr-2001	Ten Year Site Plan filed with the Florida Public Service Commission (FPSC)
Jul-2001	Ten Year Site Plan Supplemental Data filed with FPSC
Aug-2001	Presentation at the FPSC Ten Year Site Plan Workshop
Nov-2001	Hines 3 RFP Issued

20. Pages 1-2 of Florida Power Corporation's December 18, 2001, RFP contains a proposed schedule of events. Provide the actual dates on which these events occurred, explaining any differences from the schedule in the RFP.

Event	Scheduled Date	Actual Date
Notice of RFP	11/19/2001	11/19/2001
Issuance of RFP	11/26/2001	11/26/2001
Notices of Intent to Bid Due	12/10/2001	12/10/2001
This event was a date bidders were supposed to meet. Some bidders submitted notices after this date.		
Bidders Conference	12/18/2001	12/18/2001
Submission of Bids	02/12/2002	02/12/2002
Determination of Short List	04/29/2002	04/19/2002
Short Listed bidders were notified 4/19/02, but press release was not made until 4/29/02.		
Determination of Final List	05/31/2002	06/07/2002
Additional time was required to allow for additional management review and communication. Bidders were notified on 6/3/02 that announcement would be made later in the week.		
Initiate Contract Negotiations	06/03/2002	n/a
Award Announcement	07/30/2002	n/a
File contract(s) for certification	09/27/2002	n/a

21. Provide the overview of how the results of the RFP evaluation process were presented to Florida Power Corporation, Florida Progress, and Carolina Power & Light management for approval. This overview should include dates, attendance lists, and minutes of any meetings or presentations.

Meetings with management were held at two points during the RFP process: Short List determination and Final List determination.

For the Short List determination, a conference call was held on April 11, 2002 to discuss the development of the Short List. In attendance on the call were Mr. William Habermeyer, Mr. Vincent Dolan, Mr. John Flynn, and Mr. Daniel Roeder. A separate meeting covering the same material was held on April 15, 2002 to brief management in Raleigh. In attendance at that meeting were Mr. William Orser, Mr. Michael Williams, Mr. Ben Crisp, and Mr. Roeder. The information presented at both meetings covered background information on the RFP, a summary of the proposals received, an outline of the evaluation process, results of the threshold screening, economic screening, and technical evaluations, conclusions, and next steps.

For Final List determination, one meeting/conference call was held on May 29, 2002. In attendance were Mr. Habermeyer, Mr. Orser, Mr. Dolan, Mr. Crisp, and Mr. Roeder. The information presented at the meeting covered the RFP process (the steps taken and to be taken), a summary of the short-listed proposals, results of the optimization analysis, the Final List determination process, the finalized Technical Evaluation, the detailed economic analysis and sensitivity analysis, and the conclusion.

22. Explain when Florida Power Corporation notified the respondents to its RFP that the proposed Hines 3 expansion was a self-build option.

All Short-Listed bidders were notified via telephone on June 7, 2002.

23. Provide a list of staff assigned to the evaluation of RFP respondents. Also include an organizational chart depicting where in the Florida Power Corporation, Florida Progress, or Carolina Power & Light organization these individuals are assigned.

Name	Department	Name	Department
Dan Roeder	System Planning & Operations	Mark McKeage	Regulated Commercial Operations
Tom Davis	System Planning & Operations	Michael Keen	Regulated Commercial Operations
Lynn Taylor	System Planning & Operations	John Pierpont	Regulated Commercial Operations
Leslie King	System Planning & Operations	Michael Carl	Regulated Commercial Operations
Debbie Sherrod	System Planning & Operations	Robert Niekum	Regulated Commercial Operations
Ron Coats	System Planning & Operations	Paul Crimi	CT Operations
Alan Keith	System Planning & Operations	Roger Zirkle	CT Operations
Frank Walker	Treasury	Dave Sorrick	CT Operations
James Curcio	Risk Management	Harry Carbone	CT Operations
Jerry Letchworth	Power Plant Construction	Dave Sands	CT Operations
Bart White	Transmission	Bill Micklon	CT Operations (Consultant)
Fred McNeill	Transmission	George Kerst	CT Operations
Patricia West	Technical Services	Mark Lutter	CT Operations
Jamie Hunter	Technical Services	Art Ball	CT Operations
B. Randal Melton	Technical Services		

Reference attached organizational charts.

24. Provide a listing of all entities who requested transmission/integration service in response to Florida Power Corporation's RFP. Include the date of initial request, the RFP respondent's location, and the capacity of the RFP respondent's proposed facility.

By virtue of responding to the RFP, Florida Power assumed all Greenfield Proposals "requested" transmission/integration service. The following table provides the information requested above:

Bidder	Date of Request	BEGIN CONFIDENTIAL [redacted]	Capacity (MW)
A	2/12/02	[redacted]	[redacted]
B	3/1/02	[redacted]	[redacted]
C	2/12/02	[redacted]	[redacted]
D	2/12/02	[redacted]	[redacted]
F	2/12/02	[redacted]	[redacted]
G	2/12/02	[redacted]	[redacted] END CONFIDENTIAL

Through the evaluation process, some of the bidders were eliminated before the transmission system impact analysis was performed. Transmission studies were performed on bidders C, D, and F only. The analysis performed is discussed in the Need Study (Exhibit JBC-1) on pages 66-67 and in response to Interrogatory 15.

25. Discuss whether Florida Power Corporation has submitted a request for transmission interconnection service for the proposed Hines 3 project. If so, provide the date of such request and the relative position in the queue with other generation interconnection requests.

Before the Generation Interconnection Queue was created, future FPC generation alternatives were studied by Transmission Planning, then subsequently introduced via the Ten Year Site Plan. The detailed study considering thermal loading, fault current and stability analysis corresponds to the Feasibility or Impact Study phase of a Generation Interconnection

Study today. This Study begins the day after a Generation Interconnection Request is made. At the same time, Queue position is established. Based on that relationship, the request for transmission interconnection service was made no later than October 1993 for Hines 3. Hines 3 was included in the April 1998 Ten Year Site Plan. This pre-dates the introduction of the FLOASIS Generation Interconnection Queue. However, when the Queue was introduced, Hines 3 was listed along with Hines 2 and 4 as Queue entry number 2.

26. Has Florida Power Corporation filed a site certification application at the Department of Environmental Protection? If so, provide a description of when Florida Power Corporation began preparing the site certification. Include the date when the site certification application filing was approved by Florida Power Corporation management, and the staff involved in preparing the filing.

Yes, a Supplemental Site Certification Application (SSCA) was filed with the Florida Department of Environmental Protection on September 4, 2002 and deemed to be complete on September 19, 2002.

The preparation of the SSCA began with a project kick-off meeting on April 5, 2002. The initiation of the SSCA preparation was based on the timeframe necessary to have a complete application available for submittal in early September, should the outcome of the RFP process result in selection of the self-build option. A September submittal date was necessary to support the overall project schedule. The final version of the SSCA was approved for submittal on August 30, 2002.

The primary staff person responsible for the preparation of the SSCA was John J. (Jamie) Hunter, with support from external consultants.

27. Explain how conservation and demand-side management (DSM) savings are incorporated into Florida Power Corporation's integrated resource plan. Specifically, are DSM savings included only up to the end of the current DSM goals period?

Florida Power's Demand Side Management (DSM) program savings are incorporated directly into the load and energy forecast, which then serves as the basis for developing the integrated resource plan. Please refer to pages 23-24 of Florida Power's Need Determination Study for a complete description of how this is handled. As presented in appendix F, pages 15-23, of Florida Power's Need Determination Study, the projection of DSM program savings extends well beyond the end of the current DSM goals period and continues through the end of the load and energy forecast horizon.

28. If Florida Power Corporation plans to have a backup fuel source for the self-build option selected from the RFP process, describe the type of fuel that would be chosen (commodity and storage), and the expected amount of backup fuel stored (number of days burn at 100% dispatch).

Backup fuel for Hines 3 will be distillate oil. Distillate fuel oil will be available from the existing storage facility currently in place to serve Hines 1 and 2. Based on full load burn rates, the existing storage will allow a single unit to run about 139 hours (assuming no resupply). The existing storage would allow Hines 1, 2, and 3 combined to run for about 47 hours (assuming no resupply).

29. Is FPC projected to make any firm wholesale capacity sales in the year that Hines 3 comes on-line? Provide a list of all FPC's units that are projected to have a capacity factor of 55% or greater for 3 years after Hines 3 comes on-line.

As indicated in Florida Power's TYSP (reference tables on pages 15 and 18 of Appendix F of the Need Determination Study, Exhibit JBC-1), in the year that Hines 3 comes on-line, the projected 2005/2006 winter and 2006 summer firm wholesale peak demands that are included in FPC's demand forecast are 1,321 MW and 795 MW, respectively. A list of all FPC's units that are projected to have a capacity factor of 55% or greater for 3 years after Hines 3 comes on-line is provided in the Attachment. The attachment also provides cogeneration and firm capacity purchases with capacity factors of 55% or greater. Please note that the capacity factors reflected in the Attachment are annual capacity factors and do not reflect "capacity factor" or output of the plant at the time of peak.

30. Provide projections for the likelihood that Hines 3 might suffer cost overruns. What effect will cost overruns have on the decision to build Hines 3 compared to any RFP respondent?

We have made no projections on the likelihood that Hines 3 might suffer cost overruns. We have in our pricing been conservative in our estimates and have included an anticipated contingency for unforeseen costs. This contingency amount is shown in exhibit JJM-5.

As discussed on pages 73-74 of the Need Study and from line 1, page 45 through line 23, page 45 of the testimony of Daniel J. Roeder, an increase of 10% in the construction costs ($23 million) would result in the Hines 3 addition still being $65 million (CPVRR) less expensive than the next best proposal. The direct construction costs of Hines 3 would have to increase by more than $79 million (approximately 35%) for the next-best alternative to be more economical than Hines Unit 3.

31. Provide the list of contractors (engineering, design, construction, etc) and vendors that Florida Power Corporation has relied on to establishing cost estimates for the self-build option contained in the RFP.

No contractors or vendors were relied upon in developing the cost estimates for the self-build option contained in the RFP. Florida Power relied on information from Siemens Westinghouse

Power Corporation and Gemma Power Systems, LLC in developing the revised cost estimate that was provided to short-listed bidders on April 19, 2002.

32. Were the contractors listed above used in the construction of Hines 2? Provide a list showing which ones are new and which ones are the same.

Yes. Both Siemens-Westinghouse and Gemma are being used in the construction of Hines 2. Siemens-Westinghouse is providing the power island equipment and Gemma is the EPC contractor.

33. Will the Hines 3 project employ the same type 2-on-1 combined cycle unit used in Hines 2? If so, will the use of this unit worsen Florida's blackout exposure because the trip point for these units is 58 Hz with zero time delay? Please explain in detail the reliability associated with these trip points. Provide any Florida Reliability Coordinating Council study addressing this matter.

Hines 3 is anticipated to be a replicate of Hines 2. The use of this unit will not worsen Florida's blackout exposure. A study may determine that an increase in load shed at higher frequencies may be required to maintain an adequate generation/load balance during an underfrequency event. Such adjustments provide the flexibility required to maintain system reliability levels. A

Florida Reliability Coordinating Council study is underway to determine any potential reliability impacts.

As to objections.

Respectfully submitted this 7th day of October 2002.

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In re: Petition to determine need
for Hines Unit 3 in Polk County
by Florida Power Corporation
Docket No. 020953-EI

____
Signature

AFFIDAVIT

STATE OF NORTH CAROLINA)
)
COUNTY OF WAKE)

I hereby certify that on this 4th day of October, 2002, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared DANIEL J ROEDER, who is personally known to me, and he/she acknowledged before me that he/she provided the answers from Staff's First Set of Interrogatories (Nos. 1-33) to Florida Power Corporation in Docket No. 020953-EI, and that the responses are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 4th day of October, 2002.

____
(Signature)

Patty Lyn Bowers
(Printed Name)

NOTARY PUBLIC, STATE OF North Carolina

November 21, 2005
(Commission Expiration Date)

____
(Serial Number, If Any)

(AFFIX NOTARIAL SEAL)

PATTY LYN BOWERS
NOTARY
***
PUBLIC
FRANKLIN COUNTY, N.C.

My Commission Expires 11-21-2005

ATTACHMENT INTERROGATORY #11

Bidder C

Attachment 1 (FPSC Staff Interrogatory 11)

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Annual Costs	[redacted]														
Generation Capital															
Generation Fixed O&M															
Generation Non-fuel Variable O&M															
Transmission Capital and O&M															
System Fuel and Purchased Power															
Total															
PV Factor (@8 46%)															
Present Value Costs															
Generation Capital															
Generation Fixed O&M															
Generation Non-fuel Variable O&M															
Transmission Capital and O&M															
System Fuel and Purchased Power															
Total															
Cumulative Present Value Costs															
Generation Capital															
Generation Fixed O&M															
Generation Non-fuel Variable O&M															
Transmission Capital and O&M															
System Fuel and Purchased Power															
Total															

Notes:
The costs above are the incremental costs associated with the alternative.
Generation Capital includes economic carrying charge credit/cost as a result of change in resource plan from Base Case
The economic carrying charge credit/cost includes fixed O&M
Generation Non-fuel Variable O&M includes start charges
Transmission Capital and O&M includes interconnection costs identified by the Bidder and system integration costs (if any)
System Fuel and Purchased Power is the change in system fuel and purchased power costs from the Base Case
Costs are assumed to occur at the end of the year and are present valued to the beginning of 2002

CONFIDENTIAL

Bidder C

Attachment 1 (FPSC Staff Interrogatory 11)

	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Annual Costs	[redacted]													
Generation Capital														
Generation Fixed O&M														
Generation Non-fuel Variable O&M														
Transmission Capital and O&M														
System Fuel and Purchased Power														
Total														
PV Factor (@8 46%)														
Present Value Costs														
Generation Capital														
Generation Fixed O&M														
Generation Non-fuel Variable O&M														
Transmission Capital and O&M														
System Fuel and Purchased Power														
Total														
Cumulative Present Value Costs														
Generation Capital														
Generation Fixed O&M														
Generation Non-fuel Variable O&M														
Transmission Capital and O&M														
System Fuel and Purchased Power														
Total														

Notes:

The costs above are the incremental costs associated with the alternative

Generation Capital includes economic carrying charge credit/cost as a result of change in resource plan from Base Case

The economic carrying charge credit/cost includes fixed O&M

Generation Non-fuel Variable O&M includes start charges

Transmission Capital and O&M includes interconnection costs identified by the Bidder and system integration costs (if any)

System Fuel and Purchased Power is the change in system fuel and purchased power costs from the Base Case

Costs are assumed to occur at the end of the year and are present valued to the beginning of 2002

CONFIDENTIAL

Bidder D

Attachment 1 (FPSC Staff Interrogatory 11)

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Annual Costs	[redacted]														
Generation Capital															
Generation Fixed O&M															
Generation Non-fuel Variable O&M															
Transmission Capital and O&M															
System Fuel and Purchased Power															
Total															
PV Factor (@8 46%)															
Present Value Costs															
Generation Capital															
Generation Fixed O&M															
Generation Non-fuel Variable O&M															
Transmission Capital and O&M															
System Fuel and Purchased Power															
Total															
Cumulative Present Value Costs															
Generation Capital															
Generation Fixed O&M															
Generation Non-fuel Variable O&M															
Transmission Capital and O&M															
System Fuel and Purchased Power															
Total															

Notes:

The costs above are the incremental costs associated with the alternative

Generation Capital includes economic carrying charge credit/cost as a result of change in resource plan from Base Case

The economic carrying charge credit/cost includes fixed O&M

Generation Non-fuel Variable O&M includes start charges

Transmission Capital and O&M includes interconnection costs identified by the Bidder and system integration costs (if any)

System Fuel and Purchased Power is the change in system fuel and purchased power costs from the Base Case

Costs are assumed to occur at the end of the year and are present valued to the beginning of 2002

CONFIDENTIAL

Attachment 1 (FPSC Staff Interrogatory 11)

Bidder D

	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Annual Costs	[redacted]													
Generation Capital														
Generation Fixed O&M														
Generation Non-fuel Variable O&M														
Transmission Capital and O&M														
System Fuel and Purchased Power														
Total														
PV Factor (@8 46%)														
Present Value Costs														
Generation Capital														
Generation Fixed O&M														
Generation Non-fuel Variable O&M														
Transmission Capital and O&M														
System Fuel and Purchased Power														
Total														
Cumulative Present Value Costs														
Generation Capital														
Generation Fixed O&M														
Generation Non-fuel Variable O&M														
Transmission Capital and O&M														
System Fuel and Purchased Power														
Total														

Notes:

The costs above are the incremental costs associated with the alternative

Generation Capital includes economic carrying charge credit/cost as a result of change in resource plan from Base Case

The economic carrying charge credit/cost includes fixed O&M

Generation Non-fuel Variable O&M includes start charges

Transmission Capital and O&M includes interconnection costs identified by the Bidder and system integration costs (if any)

System Fuel and Purchased Power is the change in system fuel and purchased power costs from the Base Case

Costs are assumed to occur at the end of the year and are present valued to the beginning of 2002

CONFIDENTIAL

Bidder E

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Annual Costs	[redacted]														
Generation Capital															
Generation Fixed O&M															
Generation Non-fuel Variable O&M															
Transmission Capital and O&M															
System Fuel and Purchased Power															
Total															
PV Factor (@8 46%)															
Present Value Costs															
Generation Capital															
Generation Fixed O&M															
Generation Non-fuel Variable O&M															
Transmission Capital and O&M															
System Fuel and Purchased Power															
Total															
Cumulative Present Value Costs															
Generation Capital															
Generation Fixed O&M															
Generation Non-fuel Variable O&M															
Transmission Capital and O&M															
System Fuel and Purchased Power															
Total															

Notes:

The costs above are the incremental costs associated with the alternative

Generation Capital includes economic carrying charge credit/cost as a result of change in resource plan from Base Case

The economic carrying charge credit/cost includes fixed O&M

Generation Non-fuel Variable O&M includes start charges

Transmission Capital and O&M includes interconnection costs identified by the Bidder and system integration costs (if any)

System Fuel and Purchased Power is the change in system fuel and purchased power costs from the Base Case

Costs are assumed to occur at the end of the year and are present valued to the beginning of 2002

CONFIDENTIAL

Bidder E

Attachment 1 (FPSC Staff Interrogatory 11)

	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Annual Costs	[redacted]													
Generation Capital														
Generation Fixed O&M														
Generation Non-fuel Variable O&M														
Transmission Capital and O&M														
System Fuel and Purchased Power														
Total														
PV Factor (@8 46%)														
Present Value Costs														
Generation Capital														
Generation Fixed O&M														
Generation Non-fuel Variable O&M														
Transmission Capital and O&M														
System Fuel and Purchased Power														
Total														
Cumulative Present Value Costs														
Generation Capital														
Generation Fixed O&M														
Generation Non-fuel Variable O&M														
Transmission Capital and O&M														
System Fuel and Purchased Power														
Total														

Notes:
The costs above are the incremental costs associated with the alternative
Generation Capital includes economic carrying charge credit/cost as a result of change in resource plan from Base Case
The economic carrying charge credit/cost includes fixed O&M
Generation Non-fuel Variable O&M includes start charges
Transmission Capital and O&M includes interconnection costs identified by the Bidder and system integration costs (if any)
System Fuel and Purchased Power is the change in system fuel and purchased power costs from the Base Case
Costs are assumed to occur at the end of the year and are present valued to the beginning of 2002

CONFIDENTIAL

Bidder F

Attachment 1 (FPSC Staff Interrogatory 11)

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Annual Costs	[redacted]														
Generation Capital															
Generation Fixed O&M															
Generation Non-fuel Variable O&M															
Transmission Capital and O&M															
System Fuel and Purchased Power															
Total															
PV Factor (@8 46%)															
Present Value Costs															
Generation Capital															
Generation Fixed O&M															
Generation Non-fuel Variable O&M															
Transmission Capital and O&M															
System Fuel and Purchased Power															
Total															
Cumulative Present Value Costs															
Generation Capital															
Generation Fixed O&M															
Generation Non-fuel Variable O&M															
Transmission Capital and O&M															
System Fuel and Purchased Power															
Total															

Notes:

The costs above are the incremental costs associated with the alternative

Generation Capital includes economic carrying charge credit/cost as a result of change in resource plan from Base Case
  The economic carrying charge credit/cost includes fixed O&M

Generation Non-fuel Variable O&M includes start charges

Transmission Capital and O&M includes interconnection costs identified by the Bidder and system integration costs (if any)

System Fuel and Purchased Power is the change in system fuel and purchased power costs from the Base Case

Costs are assumed to occur at the end of the year and are present valued to the beginning of 2002

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Attachment 1 (FPSC Staff Interrogatory 11)

Bidder F

	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Annual Costs	[redacted]													
Generation Capital														
Generation Fixed O&M														
Generation Non-fuel Variable O&M														
Transmission Capital and O&M														
System Fuel and Purchased Power														
Total														
PV Factor (@8 46%)														
Present Value Costs														
Generation Capital														
Generation Fixed O&M														
Generation Non-fuel Variable O&M														
Transmission Capital and O&M														
System Fuel and Purchased Power														
Total														
Cumulative Present Value Costs														
Generation Capital														
Generation Fixed O&M														
Generation Non-fuel Variable O&M														
Transmission Capital and O&M														
System Fuel and Purchased Power														
Total														

Notes:

The costs above are the incremental costs associated with the alternative
Generation Capital includes economic carrying charge credit/cost as a result of change in resource plan from Base Case
The economic carrying charge credit/cost includes fixed O&M
Generation Non-fuel Variable O&M includes start charges
Transmission Capital and O&M includes interconnection costs identified by the Bidder and system integration costs (if any)
System Fuel and Purchased Power is the change in system fuel and purchased power costs from the Base Case
Costs are assumed to occur at the end of the year and are present valued to the beginning of 2002

CONFIDENTIAL

ATTACHMENT INTERROGATORY #12

	UNITS ADDED					
Year	Base Case	BID C	BID D	BID E	BID F	HINES 3
2002						
2003						
2004	CC	CC	CC	CC	CC	CC
2005	CT	CT	CT	CT	CT	CT
2006	CC	BID C	BID D	BID E, CT	BID F	HINES 3
2007				CC		
2008	CC	CC	CC		CC	CC
2009	CT	CT	CT	CC	CT	CT
2010	CC	CC	CC	CC	CC	CC
2011	CC	CC	CC	CC	CC	CC
2012						
2013						
2014						
2015						
2016		CC				
2017						
2018						
2019						
2020					CC	
2021						
2022						
2023						
2024						
2025			CC			
2026						
2027						
2028						
2029						
2030						

Note Year represents the first full year of plant operation

	SYSTEM CAPACITY (MW)					
Year	Base Case	BID C	BID D	BID E	BID F	HINES 3
2002	9,886	9,886	9,886	9,886	9,886	9,886
2003	9,877	9,877	9,877	9,877	9,877	9,877
2004	10,459	10,459	10,459	10,459	10,459	10,459
2005	10,653	10,653	10,653	10,653	10,653	10,653
2006	11,057	11,073	11,028	10,891	11,035	11,089
2007	11,052	11,068	11,023	11,436	11,030	11,084
2008	11,587	11,603	11,558	11,421	11,565	11,619
2009	11,662	11,678	11,633	11,862	11,640	11,694
2010	12,181	12,197	12,152	12,381	12,159	12,213
2011	12,731	12,747	12,702	12,731	12,709	12,763
2012	12,661	12,677	12,632	12,661	12,639	12,693
2013	12,661	12,677	12,632	12,661	12,639	12,693
2014	12,661	12,677	12,632	12,661	12,639	12,693
2015	12,661	12,677	12,632	12,661	12,639	12,693
2016	12,661	12,661	12,632	12,661	12,639	12,693
2017	12,661	12,661	12,632	12,661	12,639	12,693
2018	12,661	12,661	12,632	12,661	12,639	12,693
2019	12,661	12,661	12,632	12,661	12,639	12,693
2020	12,661	12,661	12,632	12,661	12,661	12,693
2021	12,661	12,661	12,632	12,661	12,661	12,693
2022	12,661	12,661	12,632	12,661	12,661	12,693
2023	12,661	12,661	12,632	12,661	12,661	12,693
2024	12,661	12,661	12,632	12,661	12,661	12,693
2025	12,661	12,661	12,661	12,661	12,661	12,693
2026	12,661	12,661	12,661	12,661	12,661	12,693
2027	12,661	12,661	12,661	12,661	12,661	12,693
2028	12,661	12,661	12,661	12,661	12,661	12,693
2029	12,661	12,661	12,661	12,661	12,661	12,693
2030	12,661	12,661	12,661	12,661	12,661	12,693

Note Represents winter ratings

	RESERVE MARGIN (%)					
Year	Base Case	BID C	BID D	BID E	BID F	HINES 3
2002	15 9	15 9	15 9	15 9	15 9	15 9
2003	15 4	15 4	15 4	15 4	15 4	15 4
2004	21 9	21 9	21 9	21 9	21 9	21 9
2005	21 4	21 4	21 4	21 4	21 4	21 4
2006	23 3	23 5	23 0	21 5	23 1	23 7
2007	20 2	20 4	19 9	24 4	20 0	20 5
2008	23 2	23 4	22 9	21 5	23 0	23 6
2009	20 6	20 8	20 3	22 7	20 4	21 0
2010	23 0	23 2	22 8	25 1	22 8	23 4
2011	24 9	25 1	24 7	24 9	24 7	25 2
2012	21 0	21 1	20 7	21 0	20 7	21 2
2013	21 0	21 1	20 7	21 0	20 7	21 2
2014	21 0	21 1	20 7	21 0	20 7	21 2
2015	21 0	21 1	20 7	21 0	20 7	21 2
2016	21 0	21 0	20 7	21 0	20 7	21 2
2017	21 0	21 0	20 7	21 0	20 7	21 2
2018	21 0	21 0	20 7	21 0	20 7	21 2
2019	21 0	21 0	20 7	21 0	20 7	21 2
2020	21 0	21 0	20 7	21 0	21 0	21 2
2021	21 0	21 0	20 7	21 0	21 0	21 2
2022	21 0	21 0	20 7	21 0	21 0	21 2
2023	21 0	21 0	20 7	21 0	21 0	21 2
2024	21 0	21 0	20 7	21 0	21 0	21 2
2025	21 0	21 0	21 0	21 0	21 0	21 2
2026	21 0	21 0	21 0	21 0	21 0	21 2
2027	21 0	21 0	21 0	21 0	21 0	21 2
2028	21 0	21 0	21 0	21 0	21 0	21 2
2029	21 0	21 0	21 0	21 0	21 0	21 2
2030	21 0	21 0	21 0	21 0	21 0	21.2

Note Represents winter reserve margin

ATTACHMENT INTERROGATORY #23

Progress Energy

Progress Energy Organization Chart as of 10/03/2002

J50-Sys Pl & Opers
VP-System Planning & Opers

R. E Hansen
Position #: 00000506

J50-Sys Pl & Opers
Admin Asst to Department Head
Na'imah R Ubaydah

J60-PwrSystemOper
Dir-Power Sys Ops-Carolina
Kenneth R Wilkerson
Position #: 00000509
(2)

P42-Region Plan
Dir-Regional Planning-SPOD
Verne B Ingersoll II
Position #: 00000620
(12)

EB9-ResourcePlning
Dir-Sys Resource Plng-POG
John B Crisp
Position #: 00001364
(13)

GC4-System Support
Dir-System Support-SPOD
Philip W Lewis
Position #: 00001831
(16)

842-SysOps-Fla
Dir-Power Sys Ops-FL
Eric S Grant
Position #: 00002410
(21)

Progress Energy

Progress Energy Organization Chart as of 10/03/2002

1

EB9-ResourcePlning

Dir-Sys Resource Plng-POG
John B Crisp
Position #: 00001364

EB9-ResourcePlning

Admin Assistant I
Patty L Bowers

Proj Leader-SPOD
Daniel J Roeder
David M Tsai

Sr. Fuels Coord-SPOD
Ronnie M Coats

P18-ResourcePlning

Mgr-Resource Planning-SPOD
Denise C Byrd
Position #: 00000614

14

GC6-Gen Mod & Anal

Mgr-Gen Modeling & Anlys-SPOD
Michael F Jacob
Position #: 00001775

15

Progress Energy

Progress Energy Organization Chart as of 10/03/2002

13

P18-ResourcePlning

Mgr-Resource Planning-SPOD
Denise C Byrd
Position #: 00000614

P18-ResourcePlning

Fin Spec
Joy A Musser

Sr Fin Spec
Robert J Drew
Deborah A Sherrod

Lead Engr
Thomas J Davis Jr
Andy K Thomas

Progress Energy

Progress Energy Organization Chart as of 10/03/2002

13

GC6-Gen Mod & Anal

Mgr-Gen Modeling & Anlys-SPOD
Michael F Jacob
Position #: 00001775

GC6-Gen Mod & Anal

Assoc Fin Spec
Dana N Baumann

Fin Spec
Rudy Bombien

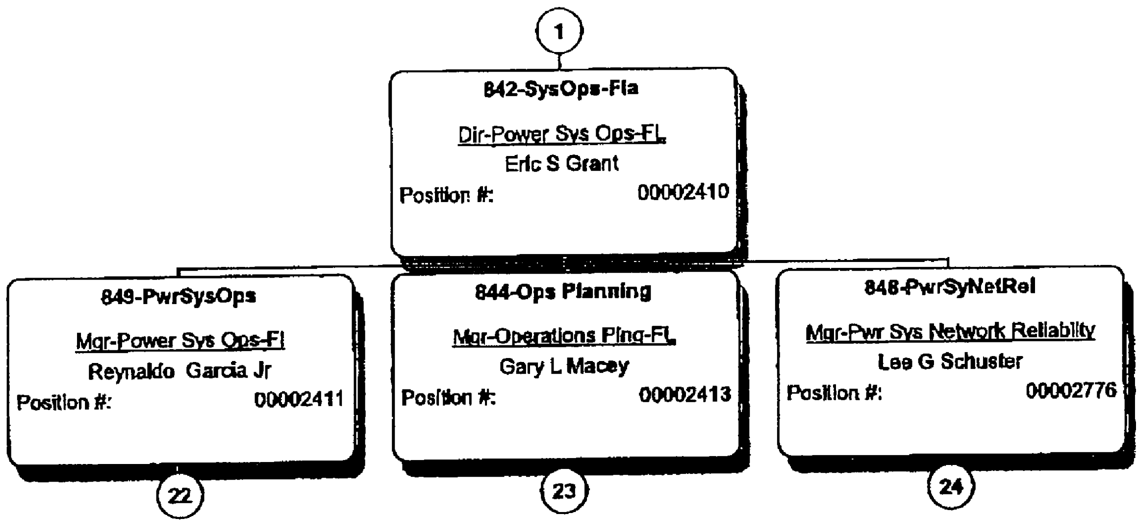
Sr Engr
Gerald W Morgan

Sr Fin Spec
David C Kennedy
Claude R Martin
Lynn E Taylor

Lead Fin Spec
Leslie D King

Progress Energy

Progress Energy Organization Chart as of 10/03/2002



Progress Energy

Progress Energy
Organization Chart as of
10/03/2002

21

844-Ops Planning

Mgr-Operations Plng-FL
Gary L Macey
Position #: 00002413

844-Ops Planning

Engr Technical Supt Spec
Paul D Smith

Sr Engr
Paul G Graves

Lead Engr
Alan M Keith

Progress Energy

Progress Energy Organization Chart as of 10/03/2002

1

CC2-FinAna&SpecPro
Mgr-Fin Analy&Spec Proj-Treas
John J Daly
Position #: 00000262

CC2-FinAna&SpecPro
Fin Spec
Sean C Trout
Sr Fin Spec
Henry F Clark
Sumita M Deshmukh
Frank S Walker II
Princ Fin Spec
Gerard F Dowd III

CC2-FinAna&SpecPro
Sr Fin Spec
Open Requisitions
Req #: 011686

Progress Energy

Progress Energy Organization Chart as of 10/03/2002

1

FZ3-RiskMgmt

Mgr-Risk Mgmt-Treasury
Kenneth W Hooper
Position #: 00001755

FZ3-RiskMgmt

Assoc Fin Spec
Rhonda C Conaghan

Sr Fin Spec
Gary A Bechard
* James A Curcio

Princ Fin Spec
Gary P Mazo

Progress Energy

Progress Energy Organization Chart as of 10/03/2002

EQ4-Pwr Plt Cnst
VP-Plant Construction

Joel Y Kamya
Position #: 00001411

EQ4-Pwr Plt,Cnst
Admin Asst to Department Head
Queen L Monk

EQ7-Plt Const-SE
Dir-Plant Construction-PV
Robert T Hope
Position #: 00001430
2

EQ9-ProjPl&Siting
Dir-Proj Planning & Siting-PV
Thomas M Cornell
Position #: 00001432
4

*JERRY LETCHWORTH (RETIRED)

681-Gen Constr
Dir-Plt Construction FL-PV
Eric G Major
Position #: 00002440
6

Progress Energy

Progress Energy Organization Chart as of 10/03/2002

23

876-TransmPlann

Mgr-Trans Planning
Howard L Gugel
Position #: 00002601

876-TransmPlann

Engr Technical Supt Spec
Cynthia A Swain

Sr Engr
Jeffrey W Hayes
* Alfred G McNeill
Randall R Strain
Gary P Webster

Lead Engr
Barry G Pagel

Administrative Assistant I-FL
Nancy L Washburn

* BART WHITE (PREVIOUS POSITION)

876-TransmPlann

Sr Engr
Open Requisitions
Req #: 011360

876-TransmPlann

Sr Engr
Open Requisitions
Req #: 012089

Progress Energy

Progress Energy Organization Chart as of 10/03/2002

11

927-EnvSvcs
Dir-Environmental Svcs-POG
Vacant Position

- **927-EnvSvcs**
  Admin Assistant I
  June I Lamb
- **739-EnvSvcAirProg**
  Mgr-Air Programs
  J. M Kennedy
  Position #: 00002428
  15
- **684-EnvSvcWatrPrg**
  Mgr-Water Programs
  * Patricia Q West
  Position #: 00002429
  18
- **866-EnvSvcWastePr**
  Mgr-Hazardous Waste Programs
  Sharon K Pardue
  Position #: 00002430
  20

Progress Energy

Progress Energy Organization Chart as of 10/03/2002

14

739-EnvSvcAirProg

Mgr-Air Programs
J. M Kennedy
Position #: 00002428

739-EnvSvcAirProg

Assoc Environmental Specialist
Matthew P Lydon

Sr Environmental Specialist
Jennifer A Stenger

Lead Environmental Specialist
John J Hunter

Environmental Coordinator I
James T Long

Env Tech II
Loyde R Fry
Debbie Y Telemeco-Anders

BC2-ENVPROAIRTEAM

ENV PROGRAM AIR TEAM
ENV PROGRAM AIR TEAM

16

Progress Energy

Progress Energy Organization Chart as of 10/03/2002

14

684-EnvSvcWatrPrg

Mgr-Water Programs
Patricia Q West
Position #: 00002429

684-EnvSvcWatrPrg

Environmental Specialist
Susan B Buller
Patricia A Garner

Sr Environmental Specialist
Amy C Dierolf
Michael L Shrader

Sr Science & Lab Svs Spec
Jeffrey Q Smith
James L Stiteler

Lead Environmental Specialist
B R Melton

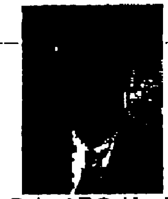
BC3-WATER PRO TEAM

WATER PROGRAM TEAM
WATER PROGRAM TEAM

19

Progress Energy

Progress Energy Organization Chart as of 10/03/2002

FT4-Reg Comm Ops
VP-Regulated Commercial Ops

Robert F Caldwell
Position #: 00001808

FT4-Reg Comm Ops
Admin Asst to Department Head
Linda L Norberg

AH6-PwrTrading
Dir-Power Trading Operations
David M Crews
Position #: 00000029
2

CH2-LongTermMktgN
Dir-Term Marketing-North
Harold L James Jr.
Position #: 00000271
11

J30-RegComOps-Coal
VP-RCO-Coal
William R Knight
Position #: 00000500
13

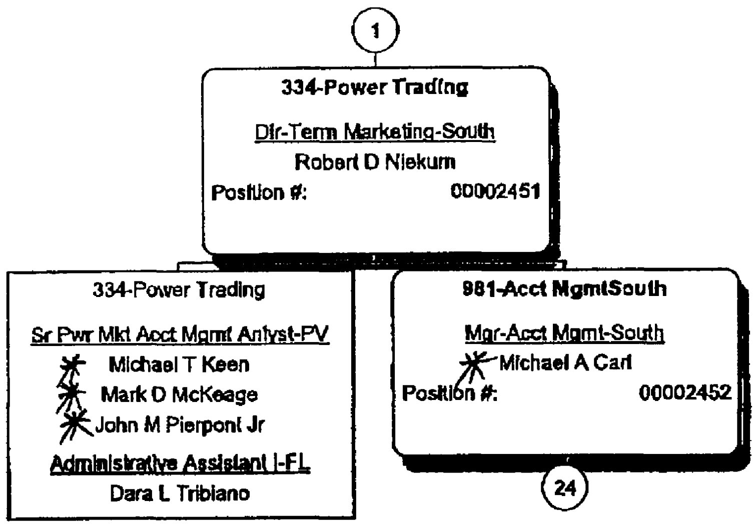
FC8-MktAnaly&Eval
Dir-Mkt Analysis-PV
Ramon W Boulmay
Position #: 00001556
17

FC5-Gas&OilTrading
Dir-Gas & Oil Trading
Pamela R Murphy
Position #: 00001557
19

334-Power Trading
Dir-Term Marketing-South
Robert D Niekum
Position #: 00002451
23

Progress Energy

Progress Energy
Organization Chart as of 10/03/2002



Progress Energy Organization Chart as of 10/03/2002

756-CT Operations
VP-Combustion Turbine Ops
[redacted]
Bruce M Baldwin
Position #: 00002703

756-CT Operations
Admin Asst to Department Head
Laura A Koch

EW4-Comb Turbines
Gen Mgr-CT Ops-Carolinas
Carolyn M Jungclas
Position #: 00001456
2

718-FL CT Ops
Gen Mgr-CT Operations-FL
David W Sorrick
Position #: 00002325
12

736-CombTurbTecSvc
Dir-Technical Services-CT
Paul V Crimi
Position #: 00002338
23

752-CT Maint Svcs
Dir-Maintenance Services-CT
Robert W Anderson
Position #: 00002340
29

HC9-CT-Unregulated
Gen Mgr-CT Ops-Unregulated
James J Klemes
Position #: 00002957
37

Progress Energy

Progress Energy Organization Chart as of 10/03/2002

(1)

718-FL CT Ops
Gen Mgr-CT Operations-FL
David W Sorrick
Position #: 00002325

718-FL CT Ops
Comb Turbine Maint Operators
James E Gill
Comb Turbine Technician
Reed S Franklin
Michael D Havens
Sr Environmental Specialist
Dave K Meyer
Mark S Tylec
Administrative Assistant I-FL
Lynda K Bates

764-BayB/SuncCT
Plt Mgr-CT-Suncoast
Michael W Lentz
Position #: 00002326
(13)

776-CenCombTurbSt
Plt Mgr-CT-Central
Kris G Edmondson
Position #: 00002328
(15)

778-NoComTurbSite
Plt Mgr-CT-North
Martin J Drango
Position #: 00002330
(17)

779-UOfFlaCogenPlt
Plt Mgr-Comb Turb-Univ of FL
Wilson B Hicks Jr
Position #: 00002332
(19)

768-ComCycPltAdm
Plt Mgr-Hines/Tiger Bay
Roger B Zirkle
Position #: 00002334
(21)

Progress Energy

Progress Energy Organization Chart as of 10/03/2002

12

768-ComCycPltAdm
Plt Mgr-Hines/Tiger Bay
Roger B Zirkle
Position #: 00002334

768-ComCycPltAdm
Sr Environmental Specialist
Gustave W Schaefer
Lead Engr
Mark A Lutter
Lead Tech Prof Mgmt Spec
Arthur M Ball
David A Sands
Sr Plant Services Assistant-FL
Debra A Griffin
Kimberlie Washington

780-HinesEnComplex
Mgr-Plant Production-CT
George R Kerst
Position #: 00002336

22

775-TigerBayCogPlt
Mgr-Plant Production-CT
Dennis A Merrick
Position #: 00002337

Progress Energy

Progress Energy Organization Chart as of 10/03/2002

1

736-CombTurbTecSvc

Dir-Technical Services-CT
Paul V Crimi
Position #: 00002338

736-CombTurbTecSvc

Sr Engr
Hue C Le
Neil Pansey

Lead Engr
Harry M Carbone

Lead Engr Technical Supt Spec
Bill L Anspaugh
Robert W Batchelor

FS9-CT Tech Svcs

Dir-Technical Services-CT
Vacant Position

24

709-CombTurbPrg

Mgr-Tech Programs-CT (IO)
Vacant Position

27

736-CombTurbTecSvc

Sr Engr
Open Requisitions
Req #: 012144

ATTACHMENT INTERROGATORY #29

Year	StationType	Station	Capacity Factor
2006	FPC	BARTOW 3	58%
2006	FPC	CR NUC 3	96%
2006	FPC	CRYSTAL 1	86%
2006	FPC	CRYSTAL 2	79%
2006	FPC	CRYSTAL 4	73%
2006	FPC	CRYSTAL 5	89%
2006	FPC	HINES 1	63%
2006	FPC	HINES 2	57%
2006	FPC	TIGERBAY 1	65%
2006	FPC	UNIV. FL COGEN	93%
2006	Purchase	MILLER UPS	100%
2006	Purchase	COGEN	90%
2007	FPC	BARTOW 3	61%
2007	FPC	CR NUC 3	84%
2007	FPC	CRYSTAL 1	80%
2007	FPC	CRYSTAL 2	85%
2007	FPC	CRYSTAL 4	86%
2007	FPC	CRYSTAL 5	77%
2007	FPC	HINES 1	64%
2007	FPC	HINES 2	60%
2007	FPC	TIGERBAY 1	69%
2007	FPC	UNIV. FL COGEN	93%
2007	Purchase	MILLER UPS	100%
2007	Purchase	TECO	58%
2007	Purchase	COGEN	90%
2008	FPC	BARTOW 3	58%
2008	FPC	CR NUC 3	96%
2008	FPC	CRYSTAL 1	86%
2008	FPC	CRYSTAL 2	81%
2008	FPC	CRYSTAL 4	77%
2008	FPC	CRYSTAL 5	87%
2008	FPC	HINES 1	61%
2008	FPC	HINES 2	55%
2008	FPC	TIGERBAY 1	65%
2008	FPC	UNIV. FL COGEN	92%
2008	Purchase	MILLER UPS	100%
2008	Purchase	TECO	56%
2008	Purchase	COGEN	90%