

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Florida Power Corporation's Earnings, Including Effects of Proposed Acquisition of Florida Power Corporation by Carolina Power & Light

DOCKET NO. 000824-EI

Submitted for Filing: November 14, 2001

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COMMISSION CLERK

FLORIDA POWER CORPORATION'S  
CONSENTED MOTION FOR EXTENSIONS OF TIME TO RESPOND

Florida Power Corporation ("FPC"), by and through undersigned counsel, hereby moves pursuant to Rule 25-106.204(5), Florida Administrative Code, for extensions of time up to and through November 19, 2001 to respond to certain of Citizens' Third Set of Interrogatories and Fourth Request for Production of Documents as follows: **Interrogatories 55(a) and 55(c) and Production of Documents Request 80.**

As grounds for its motion, FPC states as follows:

1. On or about October 9, 2001, Office of Public Counsel ("OPC"), representing the interests of Florida's Citizens ("Citizens"), served Citizens' Fourth Set of Production Requests and Citizens' Third Set of Interrogatories on FPC.

2. FPC has been diligently working to prepare responses to Citizens' interrogatories and provide documents responsive to Citizens' requests for production of documents (subject to the objections contained therein). Due to the unavailability of certain personnel, however, FPC

needs 4 additional business days to complete the responses to two interrogatory subparts, 55(a) and 55(c), and the corresponding production request, number 80.

3. Given the brevity of the requested extension, no party will be prejudiced by this request.

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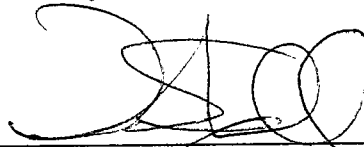
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4. FPC's counsel has consulted with Citizens' counsel who has no objection to the above-requested extensions of time to respond.

WHEREFORE, Florida Power Corporation avers that it has shown good cause and requests that the Commission enter an Order granting its Motion for Extensions of Time through and including November 19, 2001 to respond to the above identified interrogatories and production request.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of foregoing has been furnished via U.S. Mail to all other counsel of record listed below this 14th day of November, 2001.

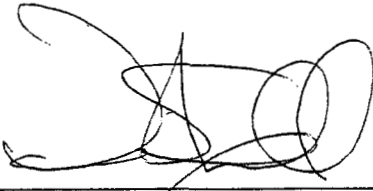
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