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December 28, 2001

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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DEC 31 AM 9:36
COMMISSION
CLERK
VIA FEDERAL EXPRESS

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

Dear Ms. Bayo:

Florida Power Corporation ("FPC" or the "Company") is filing herewith are the original and one (1) copy of the following:

1. Florida Power Corporation's Objections to The Florida Industrial Power Users Group's Third Set of Interrogatories (Nos. 34-39) to Florida Power Corporation;
2. Florida Power Corporation's Objections to The Florida Industrial Power Users Group's Third Request for Production of Documents to Florida Power Corporation (Nos. 36-40); and
3. Florida Power Corporation's Notice of Compliance with Commission December 19, 2001 Order. *16182-01*

We request you acknowledge receipt and filing of the above by stamping the additional copy of this letter and returning it to me in the self-addressed, stamped envelope provided.

If you or your Staff have any questions regarding this filing, please contact me at (727) 821-7000.

Very truly yours,
Gary L. Sasso
Gary L. Sasso *js*

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mas
FPSC-BUREAU OF RECORDS

Enclosures

APP
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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**

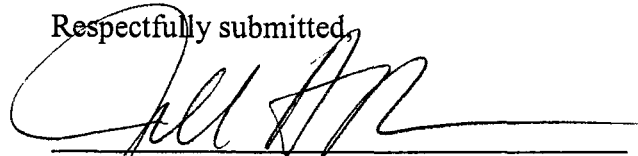
DOCKET NO. 000824-EI

Submitted for Filing:
December 31, 2001

**FLORIDA POWER CORPORATION'S NOTICE OF
COMPLIANCE WITH COMMISSION DECEMBER 19, 2001 ORDER**

Florida Power Corporation hereby gives notice of filing responses to Citizens Interrogatories numbers 28, 56, 103, and 104, and Production Request 41 in compliance with the Commission's December 19, 2001 order.

Respectfully submitted,



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Attorneys for Florida Power Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of foregoing has been furnished via U.S. Mail to the following this 28th day of December, 2001.

Mary Anne Helton, Esquire **
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Association, Inc. and Buddy L. Hansen



Attorney

INTERROGATORIES

28. Please identify the amount change in control and executive termination payments that were paid as of December 2000. Please indicate the amount of the payment, to whom the payment was made, and the company the executive worked for.

Fla. Progress

Richard Korpan	\$15,057,178
Edward Money Penny	2,620,450
Other Executives (3)	2,620,572

Electric Fuels

Richard Keller	7,517,027
Other Executives (3)	10,593,668

Florida Power

Joseph Richardson	\$8,099,779
Kenneth Armstrong	\$1,691,176
William Kelley	\$1,495,931
Other Executives (11)	\$13,760,863

Change in control executive termination payments made to executives of Florida

Progress or any other company have not been included in Florida Power's monthly reporting of earnings surveillance to the Florida Public Service Commission and were also not included in the 2002 test year.

56. Please provide an income statement and balance sheet for each Tier 1 subsidiary of the Progress Energy for the year 2000 and for the nine month period ended September 30, 2001.

FPC will produce documents responsive to this interrogatory.

103. For Florida Power Corporation provide a schedule for each month of the years 2000, 2001, and 2002 showing the total number of employees, separately showing the employee counts by management and non-management. In addition show the salary amounts for the management and non-management groupings. Please also indicate for each grouping the dollar amount of salary that was or will be capitalized. Please use actual numbers where available; otherwise please use your most recent forecasted data. Please also show the forecasted data for 2003, but for 2003 please only provide data for the year in total rather than on a month by month basis.

See attached schedules.

- 104. For Progress Energy, Inc. and each of its subsidiaries or affiliates (excluding Florida Power Corporation) provide a schedule showing for each month of the years 2000, 2001, and 2002 the total number of employees, the related total salary amounts and the dollar amount of salary that was or will be capitalized. Please also provide this data for the year 2003.**

See attached schedules.

PRODUCTION REQUEST

- 41. Please provide all documents which address or discuss announced lay offs or terminations of personnel as a result of the merger.**

- FPC will produce documents responsive to this request.