

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: January 14, 2002

COMMISSION CLERK

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FLORIDA POWER CORPORATION'S RESPONSE TO THE FLORIDA INDUSTRIAL POWER USERS GROUP'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA POWER CORPORATION

Pursuant to § 350.0611(1), Fla. Stat. (2000), Fla. Admin. Code R. 28-106.206, and Fla. R. Civ. P.1.350, Florida Power Corporation ("FPC") responds to The Florida Industrial Power Users Group's ("FIPUG") Second Request for Production of documents subject to the previously filed general and specific objections and states as follows:

DOCUMENTS REQUESTED

- 33. Referring to Schedule A-5, page 3 of 5, provide detailed calculations and workpapers supporting the development of each of the proposed interruptible service demand and energy charges.

There are no additional calculations or workpapers other than those contained in the MFR's Section E - Rate Schedules. FPC will produce a table that provides the sequence and references the appropriate MFR schedule for developing the proposed interruptible service base rate charges.

- 34. Provide all supporting workpapers for the calculation of the break-even point, in terms of hours of operation, between the installation of incremental peaking vs. baseload generation capacity on the Company's system, based on the Company's forecast of capital and operating costs for such units.

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FPC will produce documents responsive to this request.

**35. Provide workpapers supporting the Company's allocation of credits associated with non-firm service in its proposed cost of service study.**

As stated in the answer to Question 31 of FIPUG Second Set of Interrogatories, the Company does not recover the costs for credits associated with non-firm service in base rates, and therefore no related costs are included in the proposed cost of service study. The Company does seek recovery of these type credits through the Energy Conservation Cost Recovery (ECCR) clause. Allocations of the cost of credits to rate classes for purposes of calculating the ECCR charges are provided in Schedule E-17 Supplement, Schedule F, on pages 196, 198, and 200 of the MFR volume containing Section E-Rate Schedules, filed on November 15, 2001.

Respectfully submitted,



James A. McGee  
FLORIDA POWER CORPORATION  
Post Office Box 14042  
St. Petersburg, FL 33733-4042  
Telephone: (727) 820-5184  
Facsimile: (727) 820-5519

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Gary L. Sasso  
James Michael Walls  
Jill H. Bowman  
W. Douglas Hall  
CARLTON FIELDS, P. A.  
Post Office Box 2861  
St. Petersburg, FL 33731  
Telephone: (727) 821-7000  
Facsimile: (727) 822-3768  
Attorneys for Florida Power Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of foregoing has been furnished via hand delivery  
(where indicated by \*) and via U.S. Mail to the following this 14<sup>th</sup> day of January, 2002.

Mary Anne Helton, Esquire \*\*  
Adrienne Vining, Esquire  
Bureau Chief, Electric and Gas  
Division of Legal Services  
Public Service Commission  
2540 Shumard Oak Blvd.  
Tallahassee, FL 32399-0850  
Phone: (850) 413-6096  
Fax: (850) 413-6250  
Email: [mhelton@psc.state.fl.us](mailto:mhelton@psc.state.fl.us)

Jack Shreve, Esquire  
Public Counsel  
John Roger Howe, Esquire  
Charles J. Beck, Esquire  
Deputy Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison St., Room 812  
Tallahassee, FL 32399-1400  
Phone: (850) 488-9330  
Fax: (850) 488-4491  
Attorneys for the Citizens of the State of  
Florida

Daniel E. Frank  
Sutherland Asbill & Brennan LLP  
1275 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004-2415  
Telephone: (202) 383-0838  
Fax: (202) 637-3593  
Counsel for Walt Disney World Co.


Russell S. Kent, Esq.  
Sutherland Asbill & Brennan LLP  
2282 Killearn Center Blvd.  
Tallahassee, FL 32308-3561  
Telephone: (850) 894-0015  
Fax: (850) 894-0030  
Counsel for Walt Disney World Co.

Thomas A. Cloud, Esq.  
Gray, Harris & Robinson, P.A.  
301 East Pine Street, Ste. 1400  
P.O. Box 3068  
Orlando, FL 32801  
Phone: (407) 244-5624  
Fax: (407) 244-5690  
Attorneys for Publix Super Markets, Inc.

John W. McWhirter, Jr., Esquire  
McWhirter, Reeves, McGlothlin, Davidson,  
Decker, Kaufman, Arnold & Steen, P.A.  
400 North Tampa Street, Suite 2450  
Tampa, FL 33601-3350  
Telephone: (813) 224-0866  
Fax: (813) 221-1854  
Counsel for Florida Industrial Power Users  
Group

Joseph A. McGlothlin, Esquire  
Vicki Gordon Kaufman, Esquire  
McWhirter, Reeves, McGlothlin, Davidson,  
Decker, Kaufman, Arnold & Steen, P.A.  
117 South Gadsden  
Tallahassee, FL 32301  
Telephone: (850) 222-2525  
Fax: (85) 222-5606  
Counsel for Florida Industrial Power Users  
Group and Reliant Energy Power Generation,  
Inc.

Michael B. Twomey, Esq.  
8903 Crawfordville Road (32305)  
P.O. Box 5256  
Tallahassee, FL 32314-5256  
Phone: (850) 421-9530  
Fax: (850) 421-8543  
Counsel for Sugarmill Woods Civic  
Association, Inc. and Buddy L. Hansen



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Attorney