

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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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:  
February 15, 2002

FLORIDA POWER CORPORATION'S OBJECTIONS TO CITIZENS' TENTH SET OF INTERROGATORIES TO FLORIDA POWER CORPORATION (NOS. 153-157)

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 to Florida's Citizens' Tenth Set of Interrogatories (Nos. 153-157) 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

AUS \_\_\_\_\_ information responsive to certain interrogatories to which objections are not otherwise asserted are  
CAF \_\_\_\_\_  
CMP \_\_\_\_\_  
COM \_\_\_\_\_  
CTR \_\_\_\_\_  
ECR \_\_\_\_\_  
GCL \_\_\_\_\_  
OPC \_\_\_\_\_  
MMS \_\_\_\_\_  
SEC \_\_\_\_\_  
OTH \_\_\_\_\_  
\_\_\_\_\_ 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

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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. 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.

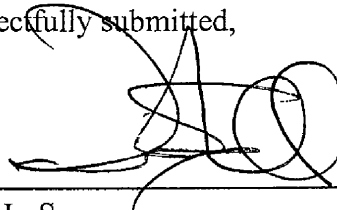
In addition, FPC reserves its right to count interrogatories and their sub-parts (as permitted under the applicable rules of procedure) in determining whether it is obligated to respond to additional interrogatories served by any party.

### **INTERROGATORIES**

- 153. Please provide, in spreadsheet format, the derivation of customer billing determinants at the tariff level. Please include all workpapers, calculations, and formulas required for each step:**
- a. Please begin with the Company's customer and sales forecast (JBC-1, JBC-7) and show how customer and sales forecasts are converted into billing determinants.**
  - b. Next, show how all billing determinants (customers, kW demand, and MWh Sales) are developed by rate class.**
  - c. Next, show explicitly how these billing determinants are applied to rate classes at the tariff level as in Schedule E-16c.**
  - d. Please clearly identify any and all adjustments that have been made in the response to (a)-(c) above.**

154. Please provide a description of the rate class corresponding to the rate class numbers used in Staff POD 43.
155. Please reconcile and explain in detail any differences in monthly forecasted customer totals at the revenue class level between the totals used in the E schedules and the Company's sales and customer forecast (Exhibit JBC-1, LBC-7), and Staff POD 43 .
156. Please reconcile and explain in detail any differences in monthly forecasted demand totals at the revenue class level between the totals used in the E schedules and the Company's sales and customer forecast (Exhibit JBC-1, JBC-7).
157. Please reconcile and explain in detail any differences in monthly forecasted MWh usage totals at the revenue class level between the totals used in the E schedules, the Company's sales and customer forecast (Exhibit JBC-1, JBC-7), and Staff POD 43.

Respectfully submitted,



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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 15th day of February, 2002.

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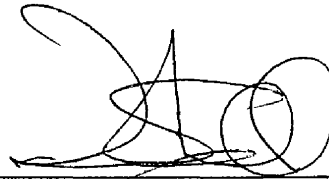
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A handwritten signature in black ink, appearing to read "Michael B. Twomey", written over a horizontal line.

Attorney