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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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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 21, 2002

**FLORIDA POWER CORPORATION'S
RESPONSE TO PUBLIX SUPER MARKETS, INC.'s THIRD SET OF
INTERROGATORIES TO FLORIDA POWER CORPORATION**

Pursuant to § 350.0611(1), Fla. Stat. (2000), Fla. Admin. Code R. 28-106.206, and Fla. R. Civ. P.1.340, Florida Power Corporation ("FPC") response to Publix Super Market, Inc. ("Publix") Third Set of Interrogatories (Nos. 47-50) subject to the previously filed general and specific objections and states as follows:

INTERROGATORIES

47. Please identify the amounts which FPC has spent over the last five years for the following activities:

- a. Opposing merchant power plant siting and development in the State of Florida.
- b. Lobbying for legislative changes in Florida law relative to the siting and development of merchant power plants in the State of Florida.
- c. Participating in appellate proceedings on an Amicus Curie basis.
- d. Public relations and advertising of any type.
- e. Political Action Committees.

d. See MFR C-12. Advertising expenses are within the Energy Conservation, Customer Serv-Other/Base Rec, Sales Expense and General Advertising Expenses categories on

MFR C-12.

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48. **For each of the amounts listed in your answer to Interrogatory 48, please indicate if these amounts are recovered or proposed to be recovered in FPC electric rates approved or authorized by the Florida Public Service Commission.**

47(d) Energy Conservation advertising costs are a direct pass through to customers through the ECCR clause. The balance of advertising costs are in base rates except for image building which is excluded from Net Operating Income for surveillance reporting purposes.

49. **Please identify each witness who has or will offer testimony on behalf of FPC in this proceeding.**

See Florida Power's Prehearing Statement filed on February 18, 2002

50. **With respect to each witness identified in your response to interrogatory number 49 above that has not already filed testimony in this docket to date, state the following:**
- a. **The witness's business address.**

Scott D. Wilson, 1391 Timberlane Road, Suite 202, Tallahassee, FL 32312

- b. **The witness's qualifications.**

See attached curriculum vitae.

- c. **The scope of the witness's employment in the pending matter**

Assist the Company in reviewing testimony, and prepare and sponsor rebuttal testimony on capital structure.

- d. **The witness's general litigation experience, including the percentage of work performed for regulatory bodies or public counsel.**

Mr. Wilson has testified multiple times in regulatory proceedings, but has not performed consulting work for a regulatory body or public counsel.

- e. **Identify each proceeding, regulatory or other, in the last five years in which the witness has offered testimony on any topic.**

See page 1 of attached curriculum vitae.

- f. **Identify each proceeding, regulatory or other, in the last five years in which the witness has offered testimony on the same topic or on a topic similar to the topic on which the witness is offering testimony in this proceeding.**

None.

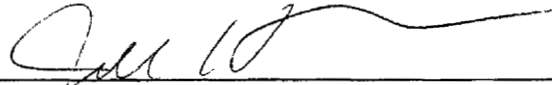
- g. **Identify all texts, treaties, textbooks, or other materials referred to and/or relied upon by the witness in the course of preparing his/her testimony in this proceeding.**

See rebuttal testimony.

- h. **Identify all documents, electronic files, texts, books, treatises, or other materials or information reviewed by the witness, whether or not referred to or relied on, in the course of preparing his/her testimony in this proceedings.**

See rebuttal testimony and work papers.

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 on February 21, 2002.

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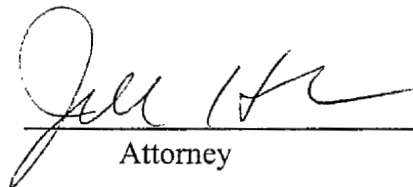
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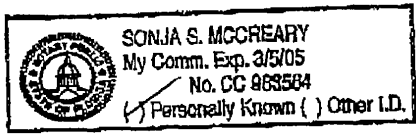


Attorney

[Handwritten Signature]
Signature

STATE OF FLORIDA
COUNTY OF SEMINOLE

BEFORE ME, the undersigned authority, duly authorized to administer oaths, personally appeared Mark Myers (to me well known) (who has produced [Handwritten ID] as identification), on behalf of Florida Power Corporation, as its Vice President and who, after first being duly sworn, deposes and says that he she executed the above and foregoing. SWORN TO and subscribed before me this 21st day of February, 2002.



[Handwritten Signature]
(Signature)

Sonja S. McCreary
(Printed Name)

NOTARY PUBLIC, STATE OF FLORIDA

3-5-05
(Commission Expiration Date)

CC983564
(Serial Number, If Any)

SCOTT D. WILSON

Scott D. Wilson is the founder of Wilson Consulting Group, which specializes in financial, economic and accounting issues. Specific areas of expertise include Corporate Finance and Valuation, Mergers & Acquisitions, Restructurings, Regulatory Policy/Rate Case Support, and Litigation Support. Mr. Wilson has served as a Consultant, Corporate Banker, and Regulator. Representative engagements include:

Stranded Costs / Competitive Issues / Regulatory Support

- Filed expert witness testimony on behalf of Central Power & Light (PUCT Docket Numbers' 19950 & 20314) on the probable lowering of costs by Corpus Christi Power & Light and Hino Electric.
- Provided expert witness testimony on behalf of Central Power & Light (PUCT Docket No 22352) on Excess Cost Over Market (ECOM) and Stranded Investment. Areas of responsibility included ECOM quantification, the appropriate market prices that should be used for ECOM estimation purposes, and the relationship between ECOM, Stranded Investment and the Competitive Transition Charges (CTC) that are to be collected from customers.
- Filed expert witness testimony on behalf of Southwestern Electric Power Company (LPSC Docket No U-21453) on Stranded Investment. Areas of responsibility included quantification of SWEPCO's Stranded Investment and the appropriateness of certain adjustments to SWEPCO's Stranded Investment estimates made by intervenors in the docket.
- Provided expert witness testimony on behalf of Arizona Electric Power Cooperative (ACC Docket No. E-01773A-98-0470). Areas of responsibility included the quantification and recovery of stranded costs, including regulatory assets.
- Provided expert witness testimony for Central Power & Light (PUCT Docket No 14965) on Stranded Costs and Stranded Investment. Areas of responsibility included valuation, quantification of stranded costs, and cost recovery mechanisms.
- Filed expert witness testimony for Central Power & Light (PUCT Docket No. 20290) on the appropriate standards to evaluate the reasonableness of their fuel and purchased power costs and provided an opinion as to the reasonableness of the performance of their functions related to the fuel and purchased power portions of service to their customers.
- Filed expert witness testimony for West Texas Utilities (PUCT Docket No. 18607) on the appropriate standards to evaluate the reasonableness of their fuel and purchased power costs and provided an opinion as to the reasonableness of the performance of their functions related to the fuel and purchased power portions of service to their customers.
- Provided expert witness testimony in the CSW/El Paso Electric merger case in Texas on the reasonable value of the Palo Verde Nuclear Generating

Assets and the reasonableness of the purchase price (valuation) of El Paso Electric.

- Provided financial and accounting analyses relating to the potential impairment, for financial reporting purposes, of a large generating station for an investor owned utility.
- On behalf of an investor owned utility in Texas provided financial analysis relating to the recently enacted restructuring legislation.
- On behalf of a Generation and Transmission Cooperative, provided services ranging from the valuation of its transmission and generation businesses, estimating potential market prices for power, and provided strategic and financial advice relative to industry restructuring.
- Provided estimates of valuation and potential stranded costs for two utilities in the Southwest U.S. Oversaw the development of market prices and preparation of all cost related data for the analysis.
- Provided assistance in formulating company positions and preparing company estimates of stranded costs in a commission directed statewide review of competition in the electric utility industry.
- On behalf of a utility, provided a detailed review of Entergy Arkansas' transition to competition plan, including reviews of market prices, generation stranded costs, and expert witness testimony.

Mergers and Acquisitions

- Performed an appraisal of the transmission systems of four Generation and Transmission Cooperatives. The purpose of the appraisals was to determine the fair market value of the transmission systems for subsequent separation of the generation and transmission businesses.
- Assisted an unregulated subsidiary of an electric utility in its review of potential acquisitions of Pacific Gas & Electric and Southern California Edison's fossil fuel plants.
- Performed analysis of proposed electric utility business combinations, including CSW/El Paso Electric, CSW/GSU, and several other proposed transactions. Areas of study included valuation and pricing, strategic considerations and values, synergy quantification, regulatory strategies, credit rating assessments, and accounting and tax implications.
- In a corporate banking capacity, performed valuation and pricing analysis, credit quality assessments, industry analysis, and capital structure/deal structure analysis for the following completed transactions: Georgia Pacific's acquisition of Great Northern Nekoosa and Contel's acquisition of McCaw's Southeastern cellular properties. Performed similar analysis for several other significant transactions for which bids were not successful.
- Assisted the unregulated subsidiary of an electric utility in its review of potential acquisitions of Personal Communication Services (PCS) licenses. Areas of responsibility included deal structuring, valuation, and bidding strategy

Restructuring / Bankruptcy

- Assisted CSW in its attempted acquisition of El Paso Electric, a firm in Chapter 11 bankruptcy. Areas of responsibility included valuation, business analysis, strategic rationale and bid preparation. Also participated in various bankruptcy court matters during CSW's involvement with El Paso Electric.
- In both consulting and corporate banking capacities, assisted firms interested in acquiring firms in Chapter 11. Areas of responsibility included valuation, business analysis, strategic rationale, bid preparation, credit analysis, and financing approvals.

Regulatory Policy / Rate Case Support / Management Audits

- In addition to the expert witness and regulatory support work described above, as a staff member and ultimately a Staff Director of the Florida Public Service Commission, provided assistance in numerous rate cases, including both policy and technical support for the Commissioners, and supervised a large staff engaged in financial, ratemaking, regulatory policy and management audit issues.
- Participated in the management audits of LaClede Gas, Columbia Gas of Ohio and Brooklyn Union Gas while a member of Ernst & Whinney's National Utility practice. Directed the Florida Public Service Commission's Management Audit group.

Prior to establishing his own firm, Mr. Wilson's relevant experience included Vice President, Citicorp N.A., where he was a Senior Analyst, Corporate Finance Strategies and Analysis Department; Director, Scott, Madden & Associates; Senior Manager, Ernst & Whinney Utility Group; Director of Financial Consulting, Energy Management Associates; Director of the Auditing & Financial Analysis Department, Florida Public Service Commission and an auditor with Arthur Andersen & Co..

Mr. Wilson was an instructor of the Fundamentals of Utility Finance course from 1986 to 1996. Mr. Wilson is a Certified Public Accountant, and a graduate of Florida State University.