

ORIGINAL



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OFFICE OF THE PUBLIC COUNSEL

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COMMISSION
CLERK

March 5, 2003

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

Re: Docket No. 000824-EI

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of the Citizens' motion to require responses to discovery in fourteen days.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

Charles J. Beck
Deputy Public Counsel

CJB:bsr

Enclosures

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FPSC-COMMISSION CLERK

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 --)
2002 Revenue Sharing)

Docket No. 000824-EI

Filed March 5, 2003

MOTION TO REQUIRE RESPONSES TO DISCOVERY IN FOURTEEN DAYS

The Citizens of Florida ("Citizens"), by and through Jack Shreve, Public Counsel, request the Prehearing Officer to require Progress Energy Florida ("Progress Energy") to respond to Citizens' first set of interrogatories and second set of requests for production of documents in fourteen days, and in support thereof state the following:

1. Citizens served our first set of interrogatories and second set of requests for production of documents on Progress Energy today. The first set of interrogatories contains only a single interrogatory, and the requests for production of documents contain only two requests for documents. All of these requests pertain solely to determining the proper amount of revenue that should be used to calculate the amount of refund Progress Energy must make to customers on account of the level of their revenues during 2002.

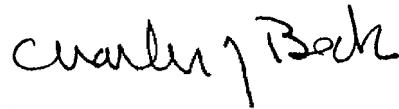
2. Citizens believe that the Florida Public Service Commission may determine the amount to be refunded at its agenda conference scheduled for April 1, 2003.

3. The limited scope of the discovery, coupled with timing of a possible decision by the Commission, warrant responses to this discovery in fourteen days.

4. Progress Energy does not object to responding within fourteen days.

WHEREFORE, Citizens request the Prehearing Officer to order Progress Energy to respond to Citizens' discovery requests within fourteen days.

Respectfully submitted,



Charles J. Beck
Deputy Public Counsel
Fla. Bar No. 217281

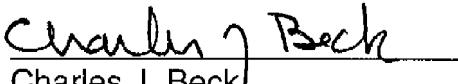
Office of Public Counsel
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(850) 488-9330

Attorney for Florida's Citizens

**CERTIFICATE OF SERVICE
DOCKET NO. 000824-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 5th day of March, 2003.


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