

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:
June 11, 2003

**PROGRESS ENERGY FLORIDA INC'S
OBJECTIONS AND RESPONSES TO
CITIZENS' SECOND SET OF INTERROGATORIES
TO PROGRESS ENERGY FLORIDA**

Pursuant to § 350.0611(1), Fla. Stat. (2000), Fla. Admin. Code R. 28-106.206, and Fla. R.
Civ. P.1.340, Progress Energy Florida, Inc. ("Progress Energy") objects and responds to
Florida's Citizens' Second Set of Interrogatories as follows:

GENERAL OBJECTIONS

Progress Energy objects to these interrogatories and any definitions and instructions that
purport to expand Progress Energy's obligations under applicable law.

Progress Energy incorporates by reference the foregoing general objection into its
response to this interrogatory.

INTERROGATORIES

- 2. For each document responsive to document request 4 contained in Citizens'
third set of requests for production of documents dated May 21, 2003, please
identify the document and provide the following:**

(a) the name and position of the person providing the document to the Florida Public Service Commissioner or to the member of the staff of the Florida Public Service Commission,

(b) the name of the person to whom the document was provided, and

(c) the date the document was provided.

Document	(a)	(b)	(c)
e-mail with attachment re refund calculation	Javier Portuondo	Dale Mailhot – Staff	January 30, 2003
e-mail with revised attachment re refund calculation	Javier Portuondo	Dale Mailhot - Staff - and Charlie Beck of the Office of Public Counsel	February 3, 2003
e-mail in response to Staff's call re December 2002 Surveillance Report	Javier Portuondo	Dale Mailhot – Staff	March 4, 2003
e-mail exchange concerning the December 2002 Surveillance report	Javier Portuondo	Dale Mailhot – Staff	March 5, 2003
e-mail exchange concerning the December 2002 Surveillance report	Javier Portuondo	Dale Mailhot – Staff	March 11, 2003
Power Point Presentation re 2002 Step by Step Revenue Sharing Calculation for Progress Energy Florida	James McGee	Filed with the Commission and provided to the Commission Staff and Parties	March 21, 2003
Revenue Sharing Report	Javier Portuondo	Filed with the Commission ; cc to Jack Shreve, Office of Public Counsel and John McWhirter, Jr. Esq.	April 9, 2003
Progress Energy Timeline of	Julia Johnson's Office	Breda Platt, Commission Aide and	Between April 4, 2003 and May 8, 2003

As to Objections:

James A. McGee
PROGRESS ENERGY SERVICE COMPANY, LLC
Post Office Box 14042
St. Petersburg, FL 33733-4042
Telephone: (727) 820-5184
Facsimile: (727) 820-5519

Respectfully submitted,



Gary L. Sasso
Jill H. Bowman
Daniel C. Brown
CARLTON FIELDS, P.A.
Post Office Box 2861
St. Petersburg, FL 33731
Telephone: (727) 821-7000
Facsimile: (727) 822-3768
Attorneys for Progress Energy Florida, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of foregoing has been furnished via U.S. Mail
(unless otherwise indicated) to the following this 16th day of June, 2003.

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

Jack Shreve, Esquire **(VIA OVERNIGHT
Public Counsel COURIER)**
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
Attorneys for the Citizens of the State of
Florida

Ron LaFace, Esquire
Greenberg Traurig, P.A.
101 E. College Ave.
Tallahassee, FL 32301
Phone: 850-222-6891
Attorneys for Florida Retail Federation

Vicki Kaufman, Esquire
Joseph McGlothlin, Jr., Esquire
McWhirter Law Firm
117 S. Gadsden St.
Tallahassee, FL 32301
Phone: 850-222-2525
Attorneys for Florida Industrial Power Users
Group

Thomas A. Cloud, Esquire
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, et al.
Post Office Box 3350
Tampa, FL 33601-3350

Michael Twomey, Esquire
Post Office Box 5256
Tallahassee, FL 32314-5256
Phone: 850-421-9530
Attorneys for Buddy Hansen and Sugarmill
Woods Civil Association

Paul E. Christensen
Sugarmill Woods Civic Assoc., Inc.
108 Cypress Blvd. West
Homosassa, FL 34446

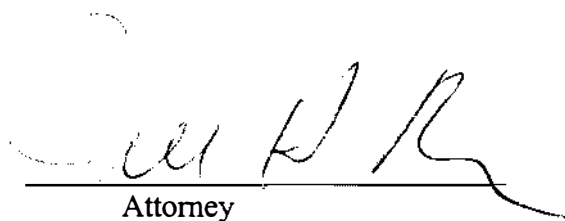
Florida Retail Federation
100 East Jefferson Street
Tallahassee, FL 32301

Buddy L. Hansen
13 Wild Olive Court
Homosassa, FL 34446

Lee Schmudde
Vice President, Legal
Walt Disney World Co.
1375 Lake Buena Drive
Lake Buena Vista, FL 32830

James J. Presswood, Jr.
Legal Environmental Assistance Foundation
1141 Thomasville Road
Tallahassee, FL 32303-6290

Christopher M. Kise
Solicitor General
Office of the Attorney General
PL-01, The Capital
Tallahassee, FL 32399-1050



Attorney