

CARLTON FIELDS  
ATTORNEYS AT LAW

ORIGINAL

ONE PROGRESS PLAZA  
200 CENTRAL AVENUE, SUITE 2300  
ST. PETERSBURG, FLORIDA 33701-4352

MAILING ADDRESS:  
P.O. BOX 2861, ST. PETERSBURG, FL 33731-2861  
TEL (727) 821-7000 FAX (727) 822-3768

September 10, 1999

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

In re: Generic investigation into the aggregate electric utility reserve  
margins planned for Peninsular Florida  
Docket No. 981890-EU

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of the following documents:

1. Notice of Filing and Service of The Rebuttal Testimony of John B. Crisp on behalf of Florida Power Corporation; and **10966 & 10967-99**
2. Florida Power Corporation's Objections to Staff's Second Set of Interrogatories (No. 48). **10968-99**

I also provided a disc of these documents for your convenience.

We request you acknowledge receipt and filing of the above by stamping the additional copy of this letter and returning it to me in the self-addressed, stamped envelope provided.

AFA 2  
 APP \_\_\_\_\_  
 CAF \_\_\_\_\_  
 CMU \_\_\_\_\_  
 CTR \_\_\_\_\_  
 EAG Staff  
 LEG 1  
 MAS 5 for test  
 OPC \_\_\_\_\_  
 PAI 2  
 SEC 1  
 WAW \_\_\_\_\_  
 OTH \_\_\_\_\_

If you or your Staff have any questions regarding this filing, please contact me at (727) 821-7000.

Very truly yours,

*Gary L. Sasso*  
Gary L. Sasso

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

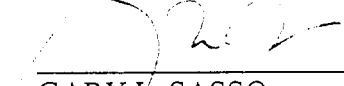
In re: Generic investigation	)	
into the aggregate electric	)	DOCKET NO. 981890-EU
utility reserve margins planned	)	
for Peninsular Florida.	)	Submitted for filing: September 10, 1999
_____	)	

NOTICE OF FILING AND SERVICE

Florida Power Corporation, through its undersigned counsel, hereby gives notice of service via U.S. Mail the Rebuttal Testimony of John B. Crisp submitted for filing with the Public Service Commission September 13, 1999 to all counsel of record as listed on the attached Certificate of Service.

Respectfully submitted,

FLORIDA POWER CORPORATION




---

GARY L. SASSO  
 Florida Bar No. 622575  
 Carlton, Fields, Ward,  
 Emmanuel, Smith & Cutler  
 Post Office Box 2861  
 St. Petersburg, FL 33731  
 Telephone: (727) 821-7000  
 Telecopier: (727) 822-3768

JAMES A. McGEE  
 Senior Counsel  
 FLORIDA POWER CORPORATION  
 P.O. Box 14042  
 St. Petersburg, Florida 33733  
 Telephone: (727) 820-5844  
 Facsimile: (727) 820-5519

DOCUMENT NUMBER-DATE

10966 SEP 13 99

FLORIDA PUBLIC SERVICE COMMISSION

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Generic investigation )  
into the aggregate electric ) DOCKET NO. 981890-EU  
utility reserve margins planned )  
for Peninsular Florida. ) Submitted for filing: September 10, 1999  
\_\_\_\_\_ )

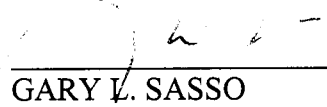
**NOTICE OF FILING AND SERVICE**

Florida Power Corporation, through its undersigned counsel, hereby gives notice of service via U.S. Mail the Rebuttal Testimony of John B. Crisp submitted for filing with the Public Service Commission September 13, 1999 to all counsel of record as listed on the attached Certificate of Service.

Respectfully submitted,

**FLORIDA POWER CORPORATION**

JAMES A. McGEE  
Senior Counsel  
FLORIDA POWER CORPORATION  
P.O. Box 14042  
St. Petersburg, Florida 33733  
Telephone: (727) 820-5844  
Facsimile: (727) 820-5519

  
\_\_\_\_\_  
GARY L. SASSO  
Florida Bar No. 622575  
Carlton, Fields, Ward,  
Emmanuel, Smith & Cutler  
Post Office Box 2861  
St. Petersburg, FL 33731  
Telephone: (727) 821-7000  
Telecopier: (727) 822-3768

DOCUMENT NUMBER-DATE

10966 SEP 13 99

FPSC-RECORDS/REPORTING

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to the following counsel of record this 10<sup>th</sup> day of September, 1999.

  
\_\_\_\_\_  
Attorney

COUNSEL OF RECORD:

Robert Scheffel Wright  
John T. LaVia  
Landers & Parsons, P.A.  
310 West College Avenue  
Tallahassee, FL 32301  
Phone: (850) 681-0311  
Fax: (850) 224-5595  
Attorneys for Duke Energy Power Services,  
LLC; Black & Veatch

Jeffrey Stone  
Beggs & Lane Law Firm  
P.O. Box 12950  
Pensacola, FL 32576-2950  
Phone: (850) 432-2451  
Fax: (850) 469-3330  
Attorneys for Gulf Power Company

Michelle Hershel  
Post Office Box 590  
Tallahassee, FL 32302  
Phone: (850) 877-6166  
Fax: (850) 656-5485  
Attorney for Florida Electric Cooperative  
Assoc.

Richard Zambo  
598 SW Hidden River Avenue  
Palm City, FL 34990  
Phone: (561) 220-9163  
Fax: (561) 220-9402  
Attorney for Florida Industrial Cogeneration  
Association

Vicki Kaufman  
John A. McGlothlin  
McWhirter Reeves  
117 S. Gadsden Street  
Tallahassee, FL 32301  
Telephone: (850) 222-2525  
Fax: (850) 222-5606  
Attorney for Florida Industrial Power Users  
Group and Reliant Energy Power Generation,  
Inc.

John W. McWhirter, Jr.  
McWhirter Reeves  
Post Office Box 3350  
Tampa, FL 33601  
Telephone: (813) 224-0866  
Fax: (813) 221-1854  
Attorney for Florida Industrial Power Users  
Group

Frederick M. Bryant, Esq.  
2010 Delta Boulevard  
Post Office Box 3209  
Tallahassee, FL 32315  
Phone: (850) 297-2011  
Fax: (850) 297-2014  
Attorney for Florida Municipal Power Agency

Paul Sexton  
Thornton Williams & Associates  
Post Office Box 10109  
Tallahassee, FL 32302  
Phone: (850) 224-3999  
Fax: (850) 224-0099  
Attorneys for Florida Reliability Coordinating  
Council

Gail Kamaras  
Debra Swim  
Legal Environmental Assistance  
Foundation, Inc.  
1114 Thomasville Road, Ste. E  
Tallahassee, FL 32303-6290  
Telephone: (850) 681-2591  
Fax: (850) 224-1275

Office of the Public Counsel  
Shreve/Beck/Pucher  
c/o The Florida Legislature  
111 W. Madison Street, #812  
Tallahassee, FL 32399-1400  
Telephone: (850) 488-9330  
Fax: (850) 488-4491

Robert Williams  
7201 Lake Ellinor Drive  
Orlando, FL 32809-5769  
Phone: (407) 859-7310  
Fax: (407) 856-6553  
Attorney for Florida Municipal Power Agency

Matthew M. Childs  
Charles A. Guyton  
Steel Hector  
215 South Monroe Street, Ste. 601  
Tallahassee, FL 32301-1804  
Telephone: (850) 222-2300  
Fax: (850) 222-7510  
Attorney for Florida Power & Light Company

Roy Young  
Young Law Firm  
Post Office Box 1833  
Tallahassee, FL 32302-1833  
Telephone: (850) 222-7206  
Fax: (850) 561-6834  
Attorneys for Kissimmee Utility Authority

Jon Moyle  
Moyle Flanigan, Katz, et al.  
The Perkins House  
118 North Gadsden Street  
Tallahassee, FL 32301  
Phone: (850) 681-3828  
Fax: (850) 681-8788  
Attorneys for PG&E Generating

Joe Welborn/Lane Mahaffey  
16313 North Dale Mabry Highway  
Tampa, FL 33618  
Telephone: (813) 963-0994  
Fax: (813) 264-7906  
Attorneys for Seminole Electric Cooperative,  
Inc.

Willard Smith/Fran Winchester  
Reedy Creek Improvement District  
Post Office Box 10175  
Lake Buena Vista, FL 32830  
Telephone: (407) 828-2034  
Fax: (407) 828-2416

Robert V. Elias, Staff Counsel  
Gerald L. Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
Telephone: (850) 413-6199  
Fax: (850) 413-6250

Ronald L. Vaden  
Utilities Commission  
City of New Smyrna Beach  
Post Office Box 100  
New Smyrna Beach, FL 32170  
Phone: (904) 423-7100  
Fax: (904) 423-7175

James Beasley  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, FL 32301  
Attorneys for Tampa Electric Co.  
Telephone: (850) 224-9115  
Fax: (850) 222-7952

James Swartz  
City of Homestead  
675 N. Flagler Street  
Homestead, FL 33030  
Phone: (305) 247-1801 (ext. 185)  
Fax: (305) 247-4008

Gary Lawrence  
City of Lakeland  
501 East Lemon Street  
Lakeland, FL 33801  
Phone: (941) 834-6522  
Fax: (941) 834-6362

Tracy E. Danese  
Jacksonville Electric Authority  
21 West Church Street, Tower 16  
Jacksonville, FL 32202  
Phone: (904) 665-6530  
Fax: (904) 665-7366

Richard G. Feldman  
City of Tallahassee  
300 S. Adams Street  
Tallahassee, FL 32301  
Phone: (850) 891-8404  
Fax: (850) 891-8109

Ken Wiley  
Florida Reliability Coordinating Counsel  
405 Reo Street, Suite 100  
Tampa, FL 33609  
Phone: (813) 289-5644  
Fax: (813) 289-5646

Harvey Wildschuetz  
City of Lake Worth Utilities  
1900 Second Avenue, North  
Lake Worth, FL 33461  
Phone: (561) 586-1665  
Fax: (561) 586-1702

Raymond O. Manasco, Jr.  
Gainesville Regional Utilities  
Post Office Box 147117  
Station A-138  
Gainesville, FL 32614-7117  
Phone: (352) 334-3400 (ext. 1016)  
Fax: (352) 334-2277

A.K. (Ben) Sharma  
Kissimmee Utility Authority  
Post Office Box 423219  
Kissimmee, FL 34742  
Phone: (407) 933-7777  
Fax: (407) 847-0787

T.B. Tart  
Orlando Utilities Commission  
Post Office Box 3193  
Orlando, FL 32802  
Phone: (407) 423-9018 (ext. 123)  
Fax: (407) 423-9198

Thomas J. Maida  
Foley & Lardner  
300 East Park Avenue  
Tallahassee, FL 32301  
Phone: (850) 222-6100  
Fax: (850) 224-3101  
Attorneys for Seminole Electric Cooperative

City of Tallahassee  
c/o Rutledge Law Firm  
Kenneth Hoffman  
Post Office Box 551  
Tallahassee, FL 32302  
Phone: (850) 681-6788  
Fax: (850) 681-6515

Dick Basford & Associates, Inc.  
Post Office Box 14831  
Jacksonville, FL 32238  
Phone: (904) 771-3575  
Fax: (904) 573-7971

Richard A. Mullaney, General Counsel  
Michael B. Wedner, Assist. General Counsel  
Office of the General Counsel  
117 West Duval Street, Ste. 480  
Jacksonville, FL 32202  
Phone: (904) 630-1700  
Fax: (904) 630-1731  
Attorneys for Jacksonville Electric Agency  
(JEA)