

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)
 _____)

DUKE ENERGY NORTH AMERICA'S FIRST
 REQUEST FOR PRODUCTION OF DOCUMENTS
TO FLORIDA POWER CORPORATION

Intervenor, Duke Energy North America ("Duke"), hereby requests Florida Power Corporation to produce the documents requested in paragraph 1 below, pursuant to Rule 1.350, Florida Rules of Civil Procedure, and Rule 28-106.206, Florida Administrative Code ("F.A.C."), for inspection and copying at the offices of Landers & Parsons, P.A., 310 West College Avenue, Tallahassee, Florida 32301, or at the offices of Carlton Fields, 215 South Monroe Street, Suite 500, Tallahassee, Florida 32301, on November 1, 1999, at 10:00 A.M. or at some other mutually agreeable time and place.

Instructions

If you are unable to provide all of the documents requested below, please provide all of the documents that you are able to

produce and state the reason(s) for your inability to produce the remainder of the documents. If you object to a request for production, please provide those documents that can be supplied without objection and state the reason(s) for each objection. If

- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- MAS _____
- OPC _____
- PAI _____
- SEC _____
- WAW _____
- OTH _____

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1

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11890 OCT-18

a privilege is claimed with respect to any document that has been requested, please identify the document, the topic discussed in the document, the privilege claimed, and the basis for your claim of privilege.

Definitions

For the purposes of this request to produce, the following terms shall be defined in the manner set forth below:

A. "Document" shall mean all written or printed papers or other materials that contain or convey information, including, without limitation, all letters, reports, memoranda, laboratory data, records of telephone or other conversations, intraoffice and interoffice communications, correspondence, handwritten or typewritten notes, diaries, records of every kind, sound recordings, transcripts, contracts, agreements, books, financial statements, books of account, journals, ledgers, invoices, indices, data processing cards, other data processing materials, data sheets, computer modeling input and output files, tapes, photographs, photostats, aerial maps, bulletins, circulars, notices, messages, tabulations, economic or statistical studies, instructions, requests, calendars, desk pads, appointment books, scrapbooks, notebooks, specifications, drawings, diagrams, sketches, and writings of every kind or character, including preliminary drafts and other copies of the foregoing, however

produced or reproduced. "Document" also includes information stored by a computer, whether stored on a hard disk, "floppy" disk, CD ROM, or in any other fashion or manner.

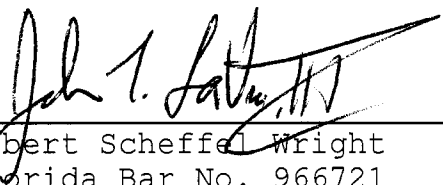
B. "Possession, custody or control" of documents shall mean documents within the actual or constructive possession, custody or control of Florida Power Corporation.

DOCUMENTS REQUESTED

Please produce all of the following documents that are in the possession, custody or control of Florida Power Corporation.

1. Any and all Documents relied upon by Florida Power Corporation's witness, John B. Crisp in the preparation of his direct testimony and all of his rebuttal testimony filed in this docket.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing filed in the referenced proceeding, has been furnished by hand delivery (*) or U.S. Mail on this 1st day of October, 1999, to the following:

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