

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:
November 16, 2001

**FLORIDA POWER CORPORATION'S
CONSENTED MOTION FOR EXTENSIONS OF TIME TO RESPOND**

Florida Power Corporation ("FPC"), by and through undersigned counsel, hereby moves pursuant to Rule 25-106.204(5), Florida Administrative Code, for extensions of time up to and through November 30, 2001 to respond to certain of Citizens' Fourth Set of Interrogatories and Fifth Request for Production of Documents as follows: **Interrogatories** 76, 85, 93, 95, 96, 98, 99 and 100 and **Production of Documents Request** 93.

As grounds for its motion, FPC states as follows:

1. On or about October 9, 2001, Office of Public Counsel ("OPC"), representing the interests of Florida's Citizens ("Citizens"), served Citizens' Fifth Set of Production Requests and Citizens' Fourth Set of Interrogatories on FPC.

2. FPC has been diligently working to prepare responses to Citizens' interrogatories and provide documents responsive to Citizens' requests for production of documents (subject to the objections contained therein). A majority of the interrogatories and production request all related to certain of the minimum filing requirement ("MFRs) schedules that relate to depreciation and plant-in-service. Since the date of its original filing, FPC has discovered some errors in the detail of these schedules that do not impact the totals, but nevertheless should be and are being corrected at this time.

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

3. FPC needs additional time to complete its corrections to these schedules and provide responses based upon these corrected schedules.

4. In addition, FPC needs a brief extension of time to respond to answers to interrogatory # 76 and #85 in order to verify their accuracy.

5. FPC's counsel has consulted with Citizens' counsel who has no objection to the above-requested extensions of time.

WHEREFORE, Florida Power Corporation avers that it has shown good cause and requests that the Commission enter an Order granting its Motion for Extensions of Time through and including November 30, 2001 to respond to the above identified interrogatories and production request.

Respectfully submitted,



James A. McGee
FLORIDA POWER CORPORATION
Post Office Box 14042
St. Petersburg, FL 33733-4042
Telephone: (727) 820-5184
Facsimile: (727) 820-5519

Gary L. Sasso
James Michael Walls
Jill H. Bowman
W. Douglas Hall
CARLTON FIELDS, P. A.
Post Office Box 2861
St. Petersburg, FL 33731
Telephone: (727) 821-7000
Facsimile: (727) 822-3768
Attorneys for Florida Power Corporation

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of foregoing has been furnished via U.S. Mail to counsel of record as listed below on this 16 day of November, 2001.

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
Public Counsel
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

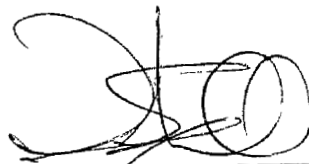
Daniel E. Frank
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2415
Telephone: (202) 383-0838
Counsel for Walt Disney World Co.

Russell S. Kent, Esq.
Sutherland Asbill & Brennan LLP
2282 Killearn Center Blvd.
Tallahassee, FL 32308-3561
Telephone: (850) 894-0015
Counsel for Walt Disney World Co.

Thomas A. Cloud, Esq.
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, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
400 North Tampa Street, Suite 2450
Tampa, FL 33601-3350
Telephone: (813) 224-0866
Fax: (813) 221-1854
Counsel for Florida Industrial Power Users
Group

Joseph A. McGlothlin, Esquire
Vicki Gordon Kaufman, Esquire
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
117 South Gadsden
Tallahassee, FL 32301
Telephone: (850) 222-2525
Fax: (85) 222-5606
Counsel for Florida Industrial Power Users
Group and Reliant Energy Power Generation,
Inc.

A handwritten signature in black ink, appearing to read 'J. McGlothlin', written over a horizontal line.

Attorney