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 GI NOV 19 PM 4:47

COMMISSION

CLERK

DOCKET NO. 000824-EI Submitted for Filing: November 19, 2001

FLORIDA POWER CORPORATION'S NOTICE OF FILING

Florida Power Corporation, through its undersigned counsel, hereby gives notice of

service of its Response to Citizen's Interrogatory to Florida Power Corporation No. 55 and

Production Request No. 80, via U.S. Mail to all counsel of record on the attached service list this

19th day of November, 2001.

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

APP .	
CAF	
CMP	
COM	
CTR	
ECR	
LEG	
OPC	14-14-14-14-14-14-14-14-14-14-14-14-14-1
PA	
RGC	
SEC	
SER	~~~~
OTH	

RECEIVER JREAU OF RECORDS

DOCUMENT NUMBER - DATE

14744 NOV 195

FPSC-COMMISSION CLERK

STP#532831.10

DOCKET NO. 000824 - SERVICE LIST

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

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.

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.

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. 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

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.

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

Michael B. Twomey, Esq. 8903 Crawfordville Road (32305) P.O. Box 5256 Tallahassee, FL 32314-5256 Phone: (850) 421-9530 Fax: (850) 421-8543 Counsel for Sugarmill Woods Civic Association, Inc. and Buddy L. Hansen

must Attorney

Interrogatory

- 55. For each affiliate, subsidiary or division of Progress Energy, where Florida Power Corporation provides services or products to the affiliate, subsidiary, or division of the Progress Energy, please respond to the following for the years 2000, 2001 and the projected test year.
- (a) Please explain how the carrying charges associated with land, buildings, and equipment are charged by Florida Power Corporation to the affiliate, subsidiary, or division.

FPC is uncertain of what OPC's means to include in the definition of carrying charges.

However, Florida Power charges Progress Telecom for its tower/pole attachments. These

charges are incorporated into the annual pole rate specified in the Service Level Agreement

between the two Companies. It is calculated using the cost based rate determination

methodology approved by the FCC. The components being Return & Income Taxes,

Depreciation Expense Other Taxes, Maintenance Expense and Administrative Expense. The

Company is also compensated for land and building use and charges Progress Telecom the

market base annual rate specified in the Service Level Agreement between the two Companies.

*(b) Provide the amount of carrying charges charged to the affiliate, subsidiary, of division.

For each year that is the subject of this request the described cost are as follows:

Tower/Pole Attachments:

2000, 2001, 2002 – annual charge is \$160,000.

Land and Building Usage

2000, 2001, 2002 – annual charge is \$569,000.

(c) Explain how Florida Power Corporation is compensated for the use of land, building, and equipment used by affiliates, subsidiaries, or divisions.

FPC is uncertain of what OPC's means to include in the definition of carrying charges.

However, Florida Power is compensated by Progress Telecom for its tower/pole attachments by

charging Progress Telecom an annual pole attachment rate specified in the Service Level

Agreement between the two Companies. It is calculated using the cost based rate determination

methodology approved by the FCC. The components being Return & Income Taxes,

Depreciation Expense, Other Taxes, Maintenance Expense and Administrative Expense.

*(d) Please state the amount of revenue recorded on Florida Power Corporation's books and the account number and name in which the revenue is recorded.

Tower/Pole Attachments

Annual revenue for 2000, 2001, 2002 is \$160,000 recorded in Account 45400 – Rent from Electric Property

Land and Building Usage

Annual revenue for 2000, 2001, 2002 is \$569,000 recorded in Account 45400 – Rent from Electric Property

* responses to subparts (b) and (d) above are intended to replace the responses previously served in error.

Production Request

80. Please provide the workpapers and source documents used to develop the amount of carrying charges or allocated costs charged to any affiliate, subsidiary, division, by Florida Power Corporation. These workpapers should include, where applicable, the return on investment used, the capital structure used, the return on equity used, the cost of debt used, and the investment to which the return is applied.

Florida Power will produce documents responsive to this request.