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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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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 COMMISSION CLERK

Submitted for Filing:  
December 18, 2001

FLORIDA POWER CORPORATION'S FIRST SET OF INTERROGATORIES TO FLORIDA'S CITIZENS

Pursuant to Rules 1.280(b)(4) and 1.340, Fla. R. Civ. P., Florida Power Corporation ("FPC") serves this First Set of Interrogatories to Florida's Citizens ("Citizens") and states as follows:

The following interrogatories are aimed at discovering information about those proposed experts, consultants and/or witnesses who intend to offer testimony on behalf of Citizens on the date Citizens is required to serve intervenor testimony as established by the Commission in this case on or about January 18, 2002. If the date for filing intervenor testimony is altered for any reason, Citizens should still be able to respond to this discovery on or before the filing deadline for such testimony.

**I. Definitions**

For the purposes of these Interrogatories, the following terms shall have the following definitions:

A. The words "you," "your" and "yourself" mean Citizens, and all other persons acting or purporting to act on Citizens' behalf during the time period referred to hereafter,

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including all experts, consultants, or other persons who will offer testimony in this proceeding on Citizens' behalf.

B. The words "person" or "persons" mean all natural persons and entities, including but not limited to: corporations, companies, partnerships, limited partnerships, joint ventures, trusts, estates, associations, public agencies, departments, bureaus or boards.

C. The terms "document" or "documents" mean the original (or, if the original is not available, then a copy) of each copy or draft of all written, printed, typed, recorded or graphic matter and all photographic matter, however produced or reproduced, now or formerly within your actual or constructive possession, custody or control or of which you or any of your personal representatives have knowledge. "Document" or "documents" shall include, but are not limited to, all records, correspondence, telegrams, computer printouts or analyses, memoranda, memoranda of telephone conversations or meetings, reports, studies, filings, notes, charges, lists, analyses, graphs, diagrams, cost or bid estimates, books, expense reports, invoices, receipts, payment vouchers, reports pertaining to conferences or telephone calls, notebooks, diaries, calendars, books of account, ledgers, journals and other financial records and personal records kept or maintained by you, all handbills or written advertisements, bid documents, and all contracts or agreements entered into by you.

D. The terms "identify" or "identity of" shall mean: (1) when used with respect to a person, to state the person's full name, present or last known business and residential addresses, and present or last known employer and position; (2) when used with respect to a document, to describe the document by character (e.g., letter, report, memorandum, etc.), author, date, and to state its present location and custodian; (3) when used with respect to an

oral communication, to identify the persons making and receiving the communication, the approximate date and time of the communication, and a summary of its content or substance.

E. The use of the singular shall be deemed to include the plural and use of the masculine shall be deemed to include the feminine as appropriate, and vice versa.

## **II. INTERROGATORIES**

1. Please identify each witness who will offer testimony on behalf of Citizens in this proceeding.
  
2. With respect to each witness identified in your response to interrogatory number one (1) state the following:
  - (a) The witness's and business address.
  - (b) The witness's qualifications.
  - (c) The scope of the witness's employment in the pending matter.
  - (d) The witness's general litigation experience, including the percentage of work performed for regulatory bodies or public counsel.
  - (e) Identify each proceeding, regulatory or other, in the last five years in which the witness has offered testimony on any topic.
  - (f) Identify each proceeding, regulatory or other, in the last five years in which the witness has offered testimony on the same topic or on a topic similar to the topic on which the witness is offering testimony in this proceeding.
  - (g) Identify all texts, treatises, textbooks, or other materials referred to and/or relied upon by the witness in the course of preparing his/her testimony in this proceeding.

(h) Identify all documents, electronic files, texts, books, treatises, or other materials or information reviewed by the witness, whether or not referred to or relied on, in the course of preparing his/her testimony in this proceedings, including but not limited to identifying by bates number all FPC documents reviewed by the witness.

These interrogatories were answered by:

\_\_\_\_\_

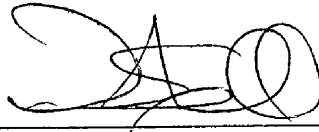
STATE OF \_\_\_\_\_

COUNTY OF \_\_\_\_\_

Sworn to and subscribed before me this \_\_\_\_ day of \_\_\_\_\_, 2002, by \_\_\_\_\_, who is personally known to me or who has produced \_\_\_\_\_ as identification.

\_\_\_\_\_  
NOTARY PUBLIC  
State of Florida at Large  
My Commission Expires:

Respectfully submitted,



\_\_\_\_\_  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of foregoing has been furnished via hand delivery (where indicated by \*), via facsimile transmission, and via U.S. Mail to the following this 18th day of December, 2001.

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