

ORIGINAL



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December 28, 2001

Blanca S. Bayo, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Re: Docket No. 000824-EI

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket is the original and 15 copies of Citizens' Objections to FPC's First Set of Interrogatories and First Set of Requests for Production of Documents to Citizens.

Please indicate the time and date of receipt on the enclosed duplicate of this letter.

Sincerely,

Charles J. Beck
Deputy Public Counsel

APP _____ CJB:bsr
CAF _____
CMP _____
COM _____ Enclosure
CTR _____
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LEG _____
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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

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

Filed December 28, 2001

**CITIZENS' OBJECTIONS TO FPC'S FIRST SET OF INTERROGATORIES
AND FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS
TO CITIZENS**

The Citizens of Florida, by and through Jack Shreve, Public Counsel, file the following objections to the first set of interrogatories and first set of requests for production of documents to Citizens served by Florida Power Corporation on December 18, 2001.

Citizens object to the time and place designated by Florida Power Corporation for production of documents. This action is pending before the Florida Public Service Commission located in Tallahassee. Citizens' office is located in Tallahassee, and both Florida Power Corporation and its law firm have offices in Tallahassee. Citizens will produce responsive documents and responses to interrogatories on January 18, 2002, at a mutually agreeable place in Tallahassee.

Citizens object to Florida Power Corporation's discovery requests to the extent they request documents or information that did not exist on the date the discovery requests were served.

Citizens object to Florida Power Corporation's discovery requests to the extent it requests proprietary or confidential information belonging to entities other than Florida Power Corporation or its affiliates.

Citizens object to Florida Power Corporation's requests for production of documents to the extent that it requests production of copyrighted information or documents readily available to Florida Power Corporation.

Citizens object to interrogatory 2(h) and request for documents 9 to the extent they requests documents or information about documents not relied upon or not referred to by a witness. These discovery requests are burdensome and irrelevant.

Respectfully submitted,



Charles J. Beck
Deputy Public Counsel
Fla. Bar No. 217281

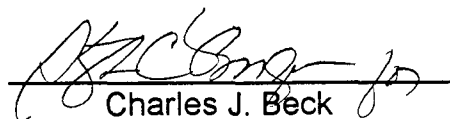
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Room 812
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(850) 488-9330

Attorney for Florida's Citizens

**CERTIFICATE OF SERVICE
DOCKET NO. 000824-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail or hand-delivery to the following parties on this 28th day of December, 2001.


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