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December 28, 2001

Blanca S. Bayo, Director
Division of 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 are the original and 15 copies of
Citizens' Preliminary List of Issues. A diskette in Word format is also submitted.

Please indicate the time and date of receipt on the enclosed duplicate of this letter
and return it to our office.

Sincerely,

Charles J. Beck
Deputy Public Counsel

APP _____
CAF _____
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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

16172 DEC 28 01

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' Preliminary List of Issues

The Citizens of Florida, by and through Jack Shreve, Public Counsel, submit the following list of preliminary issues. Citizens reserve the right to add to or change these preliminary issues as allowed by the Order on Prehearing Procedure.

Preliminary Issues

Is FPC's overall quality of service satisfactory?

 If not, should an adjustment be made to return on equity?

Is FPC's quality of service in Winter Park and the surrounding vicinity satisfactory?

 If not, should an adjustment be made to return on equity?

Does FPC request the recovery of goodwill from customers in its filing through either its proposed incentive plan or proposed acquisition adjustment?

 If so, does FPC's request to recover goodwill from customers violate the provisions of §366.06(1), Florida Statutes?

Are all of the "synergies" claimed by FPC due solely to the merger with CP&L?

May the Commission adopt the incentive regulation plan proposed by FPC?

Should the Commission adopt the incentive regulation plan propose by FPC?

What adjustments, if any, should be made on account of the merger with CP&L?

DOCUMENT NUMBER-DATE

16172 DEC 28 01

FPSC-COMMISSION CLERK

Should FPC's participation in GridFlorida (as an RTO or as an ISO) affect retail rates?

Should the PSC allow an adjustment to capital structure due to the extended nuclear power outage at Crystal River 3?

What is the appropriate capital structure to use for FPC?

What is the appropriate cost of common equity capital for FPC?

What is the appropriate weighted average cost of capital including the proper components (including the equity ratio), amounts and cost rates associated with the capital structure for the test year?

Should adjustments be made for the rate base effects of transactions with affiliated companies?

Should adjustments be made for the capital structure effects of transactions with affiliated companies?

Should adjustments be made for the net operating income effects of transactions with affiliated companies?

What is the appropriate level of Plant in Service to be included in rate base?

Should the Commission include an adjustment to the forecasted 2002 test year for the forecasted December, 2003, completion of the Hines 2 plant?

What is the appropriate level of Construction Work in Progress to be included in rate base?

What is the appropriate level of Property Held for Future Use to be included in rate base?

What is the appropriate level of Working Capital to be included in rate base?

What is the appropriate level of Accumulated Depreciation?

Is FPC's requested level of Total Operating Revenues appropriate?

Are the company's estimated revenues for sales of electricity based upon reasonable estimates of customers, KW, and KWH billing determinants by rate class?

Should any changes be made to the revised sales forecast filed on November 15, 2001?

Is FPC's requested level of Operation and Maintenance Expense appropriate?

Should an adjustment be made to account for the changing level of employees during the test year?

Is FPC's requested level of Other Post Employment Benefits Expense appropriate?

Should an adjustment be made to the changes to pension credit filed by FPC on November 15, 2001?

What is the appropriate amount of outside services expense to be allowed in operating expense?

Is FPC's requested level of Bad Debt Expense appropriate?

Is FPC's requested Rate Case Expense appropriate?

What amortization period should be used for rate case expense?

What adjustments, if any, should be made to O&M expenses for the test year?

Should the traditional benchmark test be used to determine which O&M expenses FPC must justify on the record?

Is FPC's requested level of Nuclear O&M appropriate?

Is FPC's requested level of Total Fossil O&M appropriate?

Is FPC's requested level of tree-trimming expense appropriate?

Is FPC's requested level of Customer Accounts Expense appropriate?

Is FPC's requested level of Customer Service Expense appropriate?

Is FPC's requested level of Sales Expense appropriate?

Is FPC's requested level of Administrative and General Expense appropriate?

Is FPC's requested Depreciation Expense appropriate?

Is FPC's requested level of Taxes Other Than Income Taxes appropriate?

Are FPC's requested Income Tax expenses appropriate?

Are consolidating tax adjustments appropriate, and if so, what are the appropriate amounts?

Is FPC's requested Net Operating Income for the test year appropriate?

Are FPC's proposed revenue expansion factors appropriate?

Are FPC's separation of amounts for the wholesale and retail jurisdictions appropriate?

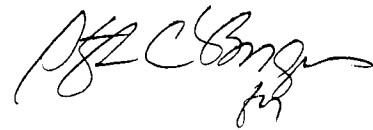
What is the appropriate cost of service methodology to be used in designing the rates of FPC?

If the Commission approves a rate change, how should it be allocated among the classes?

Did the PSC lawfully reduce the amount subject to refund by the additional amount FPC elects to amortize Tiger Bay?

How much money, if any, should be refunded to customers?

Respectfully submitted,



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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 of December, 2001.


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