

ORIGINAL

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: January 9, 2002

COMMISSION CLERK

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FLORIDA POWER CORPORATION'S RESPONSE TO CITIZENS' TENTH REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA POWER CORPORATION

Pursuant to § 350.0611(1), Fla. Stat. (2000), Fla. Admin. Code R. 28-106.206, and Fla. R. Civ. P.1.350, Florida Power Corporation ("FPC") responds to Florida's Citizens ("Citizens") Tenth Request for Production of Documents (Nos. 124-133) subject to the forgoing general and specific objections and states as follows:

DOCUMENTS REQUESTED

124. For purposes of this request please refer to the Company's response to OPC POD 79.

(a) Please provide the workpapers supporting page 1 of the documents produced in response to this POD.

FPC will produce documents responsive to this request.

(b) Please provide the workpapers showing how the amounts shown on pages 2 through 7 were developed.

FPC will produce documents responsive to this request.

(c) Please provide all invoices from Progress Telecom to FPC from January 2000 to November 2001.

See response to production request # 126.

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125. For purposes of this request please refer to Myers Testimony, p. 28, where he states: “In fact, based on our projection of net synergies, we are prepared to guarantee that Florida Power’s customers will receive an annual rate credit of \$5 million for a period of 15 years, totaling \$75 million, representing 50 percent of expected net synergies.” Please provide all documents in your possession, custody or control which show how these amounts were calculated. Include in this response all electronic files, all source documents, and all workpapers.

See response to Citizen’s Seventh Set of Interrogatories to FPC Question #118.

Documents supporting Exhibit MAM-1 of the Direct Testimony of Mark A. Myers dated September 14, 2001 were previously provided in response to Citizen’s Third Set of Requests for Production of Documents Question #73.

126. Please provide invoices from all affiliates of FPC that provide it services or products from January 2000 through 2001.

FPC will produce documents responsive to this request.

127. Please provide invoices from FPC to all affiliates that FPC provides services or products to from January 2000 through 2001.

FPC will produce documents responsive to this request.

128. For purposes of this request please refer to the Company’s response to OPC POD 73.

- (a) Provide the workpapers that show how the allocation rate appearing on the second half of the page shown on page 001747 was calculated.

FPC will produce documents responsive to this request

- (b) Please explain any differences between the itemized allocation rates appearing on 001747.

No differences between the itemized allocation rates should have occurred. FPC will produce documents explaining the impact of the correction to any itemized allocation that differed from the norm.

- 129. Please provide an income statement and balance sheet for each Tier 1 subsidiary of the Progress Energy for each of the years 2000, and the third quarter ending 2001, a budgeted income statement and balance sheet for the year ending 2001 and 2002.**

FPC previously provided documents responsive to this request in response to interrogatory number 56.

- 130. Please provide the log of corporate aircraft use for the year ending 2000.**

FPC objects to this request as irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence. No expenses for corporate aircraft are included in the 2002 test year.

- 131. For purposes of this request, please refer to Bazemore's Appendix C and E.**

- (a) Please provide document(s) similar to the ones contained in Appendix C and E, but that are consistent with the amount of charges from Progress Energy Services included in the 2001 and 2002 test years.**

The documents provided in Appendix C and E are consistent with the amount of charges from Progress Energy Services to FPC included in the 2001 budget. The sum of the charges to FPC included on Appendix C is \$127.1M. Of the \$127.1M, \$98.9M was included in FPC's regulated O&M budget and \$28.2M was included in FPC's Capital budget. Refer to the response provided to the Citizen's Second Set of Interrogatories question #48 for a breakdown by FERC account of the O&M charges. The information provided in Appendix C and E is not available for the 2002 test year. Refer to the

response provided to the Citizen's Second Set of Interrogatories question #48 for an explanation of the allocation process for the 2002 test year.

(b) Provide workpapers that support the allocation factors produced in response to (a).

Refer to the response provided in the Citizen's Second Set of Interrogatories question #48 for the workpapers that support the allocation factors for 2001.

(c) Please provide the source documents used to develop the allocation factors.

Refer to the response provided in the Citizen's Second Set of Interrogatories question #48 for the source documents used to develop the allocation factors.

133. For purposes of this request, please refer to Bazemore's Appendix E. Please provide the source documents used to develop the allocation factors.

FPC directs OPC to the response to Citizens Tenth Set of Production of Documents question 131(c).

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 *) and via U.S. Mail to the following on January 9, 2002.

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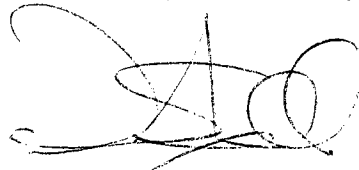
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