

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 11, 2002

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FLORIDA POWER CORPORATION'S RESPONSE TO CITIZENS' ELEVENTH 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") response to Florida's Citizens ("Citizens") Eleventh Request for Production (Nos. 134-141) subject to the previously filed general and specific objections and states as follows:

DOCUMENTS REQUESTED

- 134. Please provide the Florida Power Operating Report prepared by the finance department for November, 2001, and the Florida Power Corporation Financial Analysis report for October and November, 2001.

FPC will produce documents responsive to this request.

- 135. Please provide each 2-year business plan created during calendar year 2001 for each business unit of Florida Power Corporation, Florida Progress Corporation, Progress Energy, Inc., and Progress Energy Service Company, LLC., including but not limited to the most recent business plan, even if in draft, non-final, or unapproved form.

Florida Power has produced documents responsive to this request in response to Citizens' Sixth Set of Requests for Production of Documents to FPC Question #101 and Citizens' Eighth Set of Requests for Production of Documents to FPC Question #112.

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136. **For purposes of this request please refer to the response to OPC's POD 12 bates page 005165.**

(a) Please provide the report dated December 16, 1999 concerning Progress Telecommunication Corporation's Transfer Pricing Model Review.

FPC will produce documents responsive to this request.

(b) Please provide the transfer pricing model in electronic form.

The use of the term "model" in connection with this calculation is somewhat of a misnomer as there is no "model" per se.

(c) Please provide documentation explaining how the model works.

See response to b.

137. **Please provide contracts or agreements between the Company and any affiliates that provide services to the Company.**

See response to Citizen's 3rd Set of Production of Documents to FPC Question #49

FPC will also produce documents responsive to this request.

138. **For purposes of this request please refer to the response to OPC's POD 49 bates page 000824. From December 2000 to date, please provide the "month report to Client Company" referred to in Section 2.3 of the agreement between Florida Power Corporation and Progress Energy Service Company.**

FPC will produce documents responsive to this request. There were no billings from

Florida Progress to Progress Energy Service Company for December 2000.

139. **For purposes of this request please refer to the response to OPC's POD 49 bates page 000853-000855.**

(a) From January 2001 to date, please provide the "monthly report to Client Company" referred to in Section 2.3 of the agreement between Florida Power Corporation and Progress Energy Service Company. (Bates page 000853)

See response to Citizen's 10th Set of Production of Documents to FPC Questions #127.

(b) Provide all the documents referred to in Article 1 of the agreement that allows FPC to identify costs to charge to Progress Energy Company. (Bates page 000855)

See attached document titled *Billings to Service Company*. The “Activity” charged identifies the type of cost charged to Progress Energy Service Company

(c) Please provide any documents or manuals which explain how these costs are allocated/charged to Progress Energy Service Company.

FPC refers Citizens to OPC3-000857.

(d) Provide all workpapers, calculations and source documents which shown how these costs were charged from FPC to Progress Energy Service Company for the year 2001.

Responsive documents were provided in response to OPC's 10th set of production request, question #127.

(e) Provide all workpapers, calculations and source documents which shown how these costs were charged from FPC to Progress Energy Service Company for the budgeted test year.

At the time of the rate case submission, the detailed budget for 2002 had not yet been prepared. The amount included in the test year for charges to Progress Energy Service Company were based on the amounts included in the 2001 budget in FERC 186.14. See the attached schedule of the amounts included in FERC 186.14.

140. Produce all documents identified in response to OPC's 8th set of Interrogatories.

FPC will produce documents, if any, responsive to this request.

141. For purposes of this request please refer to the response to OPC's POD 49 bates page 009012. From January 2001 to date, please provide the “month report to Client Company” referred to in Section 2.3 of the agreement between Capital Holdings, Inc. and Progress Energy Service Company.

Progress Energy Service Company did not provide any services to Progress Capital Holdings, Inc. in 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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of foregoing has been furnished via ******(hand delivery) and via U.S. Mail to the following this 11th day of January, 2002.

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

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
Fax: (850) 488-4491
Attorneys for the Citizens of the State of
Florida

Daniel E. Frank
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2415
Telephone: (202) 383-0838
Fax: (202) 637-3593
Counsel for Walt Disney World Co.

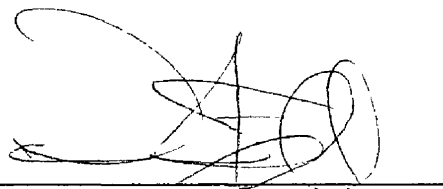
Russell S. Kent, Esq.
Sutherland Asbill & Brennan LLP
2282 Killearn Center Blvd.
Tallahassee, FL 32308-3561
Telephone: (850) 894-0015
Fax: (850) 894-0030
Counsel for Walt Disney World Co.

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.

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

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: (850) 222-5606
Counsel for Florida Industrial Power Users
Group and Reliant Energy Power Generation,
Inc.

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



Attorney