

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

Submitted for Filing: January 11, 2002



FPC'S SECOND NOTICE OF INTENT TO REQUEST CONFIDENTIAL **CLASSIFICATION**

Florida Power Corporation ("FPC" or the "Company"), pursuant to Section 366.093, Fla. Stats., and Rule 25-22.006, F.A.C., files this second notice of intent to request confidential classification for certain documents produced by FPC in response to the Staff of the Florida Public Service Commission's ("Staff") Sixth Set of Request for Production of Documents to FPC. A copy of the request for production is attached. FPC further states as follows:

1. Staff has requested copies of certain confidential documents in its sixth request for production of documents.

2. A complete set of the confidential documents requested by Staff is attached to this second Notice in a sealed envelope, with the confidential information highlighted by page or line, as appropriate. This information should be accorded confidential treatment pending the filing of FPC's Request for Confidential Classification and a decision on FPC's request by the Florida Public Service Commission.

3. Within 21 days of the date of this second Notice, FPC will file a Second Request for Confidential Classification pursuant to Rule 25-22.006(4)(a), with a Justification Matrix supporting Florida Power's request for confidential classification on a page-by-page, line-by-line basis, and a supporting affidavit confirming the basis for this request and the confidential nature

This docketed notice of intent was filed with Confidential Document No. 00437-02. The document has been placed in confidential storage ^{3UREAU OF RECORDS} pending timely receipt of a request for confidentiality.



DOCUMENT NUMBER - DATE

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FPSC-COMMISSION CLERK

of the highlighted information. Fifteen public copies of the Documents, with the confidential information redacted, will also be filed with the request.

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> > and

Robert A. Glenn Director, Regulatory Counsel Group Florida Power Corporation P.O. Box 14042 St. Petersburg, FL 33733 Telephone: (727) 820-5184 Facsimile: (727) 820-5519

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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 this (where indicated by *) and via U.S. Mail to the following this

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

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Attorney

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 DATED: December 12, 2001

STAFF'S SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA POWER CORPORATION (NOS. 34 - 47)

Pursuant to Rule 25-22.034, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, the Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby serves the following Request for Production of Documents upon Florida Power Corporation (FPC).

Please produce the following documents at the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Gerald L. Gunter Building, Tallahassee, Florida 32399-0850, no later than thirty days after service of this request for the purpose of inspection and copying:

DEFINITION

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or record, including but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intraoffice memorandum, memorandum reflecting an oral communication,

handwritten or other notes, working paper, draft, application, permit, chart, paper, graph, survey, index, tape, disc, data sheet or data processing card, computer printout, or any other written, recorded, transcribed, filed or graphic matter, however produced or reproduced.

34. Provide the Actual vs. Forecast Variance Analysis through Nov. 2001. (Hewitt)

35. Provide statistical models by revenue class. (Hewitt)

36. Provide, in electronic format, 10 years of historical and 5 years forecast data used to calculate revenue class models for:

(a) June 2001 Forecast

(b) Sept. 2001 Forecast (Hewitt)

37. Provide worksheet (including formulas) and all reference materials used to revise the June 2001 Forecast economic variables for the Sept. 2001 Forecast. (Hewitt)

38. Provide copy of DRI/WEFA documents used to derive economic assumptions used in June 2001 Forecast economic variables. (Hewitt)

Provide copy of DRI/WEFA documents supporting JBC-5 direct 39. testimony. (Hewitt)

40. Provide copy of BEBR documents supporting population and customer growth assumptions. (Hewitt)

41. Provide copy of documents supporting forecasted sales to phosphate customers and coincident peak demands. (Hewitt)

42. Provide copy of documents supporting number of historical and forecasted customers participating in the Seasonal Service Rate. (Hewitt)

43. Provide copy of spreadsheets used to disaggregate revenue class forecast into rate class forecast. (Hewitt)

- 44. Provide, in electronic format, the analyses used to develop the Company's wholesale sales forecast. This should include:
 - (a) Identifying total number of wholesale customers;
 - (b) Identifying those customers, and their respective loads, that are on full requirements contracts;

- (c) Identifying those customers, and their respective loads, that are on partial requirements contacts;
- (d) Identifying those customers, and their associated loads, that are taking "supplemental" contracts;
- (e) Providing the rates, for each wholesale customer, setfor those contracts as used for forecasting purposes;
- (f) Providing the Company's forecasted wholesale market prices;
- (g) Providing the Company's forecast of its cost of providing service to wholesale customers. (Hewitt)

45. Please provide copies of the 2001 Operating Report for October and November, 2001. (Revell)

46. Please provide copies of all of the source documents used to determine the short term debt interest rates used for the projected year ending December 31, 2002. (Vendetti)

47. In reference to Schedule F-17, page 4 of 25, please provide copies of all of the source documents used to determine each inflation rate forecast. (Vendetti)

MARY ANNE HELTÓN Senior Attorney ADRIENNE E. VINING Staff Attorney

FLORIDA PUBLIC SERVICE COMMISSION 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 Telephone No.: (850) 413-6199 Facsimile No.: (850) 413-6250

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Florida Power DOCKET Corporation's earnings, including effects of proposed DATED: acquisition of Florida Power Corporation by Carolina Power & Light.

DOCKET NO. 000824-EI DATED: December 12, 2001

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the Commission Staff's Statf's Sixth Request for Production of Documents to Florida Power Corporation, numbered 34 through 47, has been furnished to Gary L. Sasso, Esquire and James M. Walls, Esquire, Carlton, Fields Law Firm, P.O. Box 2861, Saint Petersburg, Florida 33731, and that a true and correct copy thereof has been furnished to the following, by U.S. Mail, this 12th day of December, 2001:

Jack Shreve, Public Counsel Ronald C. LaFace, Esq. Office of Public Counsel Seann M. Frazier, Esq. c/o The Florida Legislature Greenberg Traurig, P.A. 111 W. Madison St., Room 812 101 East College Avenue Tallahassee, FL 32399-1400 Tallahassee, FL 32301 Attorney for Citizens of the Attorneys for Florida Retail SLate of Florida Federalion John W. McWhirter, Jr., Esq. Joseph A. McGlothlin, Esq. McWhirter, Reeves, et al. Vicki Gordon Kaufman, Esq. 400 N. Tampa Street, Ste. 2450 McWhirter, Reeves, et al. Tampa, FL 33601-3350 117 S. Gadsden Attorney for FIPUG Tallahassee, FL 32301 Attorneys for FIPUG

CERTIFICATE OF SERVICE DOCKET NO. 000824-EI

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