

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 14, 2002

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FLORIDA POWER CORPORATION'S MOTION FOR EXTENSIONS OF TIME TO RESPOND

Florida Power Corporation ("FPC"), by and through undersigned counsel, hereby moves pursuant to Rule 25-106.204(5), Florida Administrative Code, for extensions of time up to and through January 17, 2002 to respond to certain of Citizens' Ninth Set of Interrogatories and Twelfth Request for Production of Documents: Interrogatories 133 and 143 and Production Request 146:

As grounds for its motion, FPC states as follows:

1. On or about December 13, 2001, Office of Public Counsel ("OPC"), representing the interests of Florida's Citizens ("Citizens"), served Citizens' Ninth Set of Interrogatories on FPC and Twelfth Request for Production of Documents.

2. FPC has been diligently working to prepare responses to Citizens' interrogatories and production requests and to respond to the interrogatories and production requests of other parties, including Florida Industrial Power Users Group, Publix Supermarkets, and Staff.

Indeed, served simultaneous with this motion, are Florida Power's responses to FIPUG's Second Set of Interrogatories, FIPUG's Second Request for Production of Documents (33-35), Publix's First Request to Production of Documents (1-15), Publix's First Set of Interrogatories (1-43), and the remainder of Citizens Ninth Set of Interrogatories (131-152) and Twelfth Set of Requests to

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Produce (142-150). In addition, since the beginning of this year alone, Florida Power has responded to FIPUG's First Set of Interrogatories (1-23), FIPUG's First Request for Production of Documents (1-32), Staff's 8th Set of Interrogatories (204-210), Citizens' 8th Set of Interrogatories (125-130), Citizens 11th Set of Request for Production (134-141) and Staff's Sixth Request for Production of Documents (34-47). Given the volume of discovery and with the intervention of the holidays and resulting employee vacations, Florida Power has been unable to complete and ensure the accuracy of its responses to Citizens interrogatories numbers 133 and 143 or collect all documents responsive to production request 146. FPC needs additional time to complete its corrections to these schedules and provide responses based upon these corrected schedules.

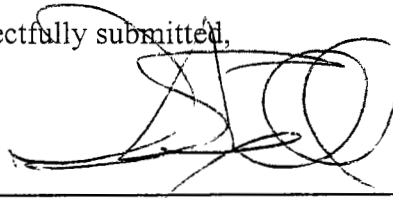
4. As such, FPC needs a brief extension of time to respond to answers to interrogatories 133 and 143 and production request 146.

5. FPC's counsel has consulted with Citizens' counsel who objects to the above-requested extensions of time.

WHEREFORE, Florida Power Corporation avers that it has shown good cause and requests that the Commission enter an Order granting its Motion for Extensions of Time through

and including January 17, 2002 to respond to the above identified interrogatories and production request.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of foregoing has been furnished via U.S. Mail to counsel of record as listed below on this 14th day of January, 2002.

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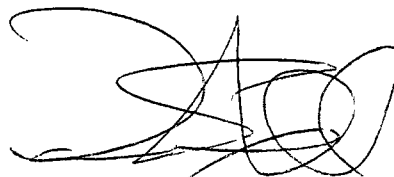
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