

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 14, 2002

RECEIVED-FPSC 02 JAN 14 PM 4: 59 COMMISSION CLERK

FLORIDA POWER CORPORATION'S RESPONSE TO CITIZENS' TWELFTH 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") Twelfth Request for Production of Documents (Nos. 142-150) subject to the previously filed general and specific objections and states as follows:

DOCUMENTS REQUESTED

142. Provide copies of all employee newsletters issued during 2001 to date.

See attached CD

143. Provide workpapers showing, in detail, how each of the amounts in the adjustments columns on Exhibit MAM-5 were determined.

FPC will produce documents responsive to this request.

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RECEIVED & FILED RLM FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00512 JAN 14 8

FPSC-COMMISSION CLERK

- 144 **Pay Stations / Business Offices.** Provide a copy of any cost/benefit analysis conducted by or for the Company relating to the opening of the 150 new payment locations and the closing of 33 businesses offices discussed on page 12 of Mr. Meyer's testimony and in the response to OPC Interrogatory No. 28.

FPC will produce documents responsive to this request.

- 145 **Property Insurance Expense.** Refer to the response to OPC Interrogatory 81. Provide all information received from the Company's insurers that the Company relied on in estimating that its non-nuclear property insurance costs would double from 2000 to 2001 and continue to rise in 2002.

FPC will produce documents responsive to this request.

146. **Medical Costs.** Refer to the response to OPC Interrogatory 82. Provide any information received from the Company's medical insurance providers regarding increases in rates/premiums between 2000, 2001 and 2002.

Florida Power is in the process of collecting documents from these outside vendors and will produce copies as soon as they become available.

147. **Medical Benefits – Retirees.** Provide a copy of the information received from Buck Consultants regarding the estimate of the cost of incorporating the plan changes into the Progress Energy Plan referred to in response to OPC Interrogatory 83. Also, if the actuarial study referred to for 2001 and 2002 is now available, provide a copy of the study.

The information received from Buck Consultants regarding the estimate of the cost of incorporating the plan changes was provided as an attachment to the response to OPC Interrogatory #83. The 2001 actuarial study will not be available until the next one to two weeks. The 2002 actuarial study is not performed until late in 2002.

- 148. Medical Benefits – Retirees. The response to OPC 83 includes a 3-page attachment. The 3<sup>rd</sup> page is a page for an actuarial study by Hewitt Associates. Provide a copy of the complete actuarial study conducted by Hewitt Associates for which the page is from.**

Enclosed is the complete 2000 actuarial study.

- 149. Miscellaneous Benefits. Refer to the response to OPC Interrogatory 84. Provide a copy of the new Restricted Stock Grant program.**

See the attached excerpt from the proxy statement dated April 2, 2001.

- 150. Provide all supporting workpapers for the MFR schedules identified in interrogatory 135.**

See MFR C-55, C-3, response to Citizen's First Set of Production of Documents to FPC Question #2 (2002 Budget) and response to Citizen's Third Set of Production of Documents to FPC Question #73 (a).

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 this 14<sup>th</sup> day of January, 2002.

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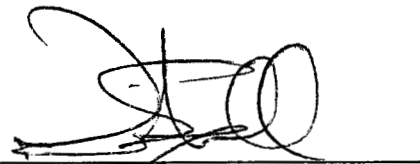
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