

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 22, 2002

RECEIVED FPSC 02 JAN 22 PM 4:50 COMMISSION CLERK

FLORIDA POWER CORPORATION'S RESPONSE TO THE FLORIDA INDUSTRIAL POWER USERS GROUP'S THIRD REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA POWER CORPORATION (NOS. 36-40)

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 The Florida Industrial Power Users Group's ("FIPUG") Third Request for Production of Documents, subject to the general and specific objections previously filed, and states as follows:

DOCUMENTS REQUESTED

36. For each FPC generating unit where either the commodity supplier or the transporter of fuel is an affiliate of FPC, please provide all documentation in FPC's possession which shows that the commodity price, or transportation charge, is priced at or below market. Include all analyses or summaries of requests for proposals undertaken to establish the commodity and transportation service market price.

FPC objects to this request as irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence in a proceeding concerning base rates as FPC does not recover the fuel costs in base rates.

37. For each affiliate expense included in the MFRs, please provide any documentation in FPC's possession which shows that the price of the service or commodity obtained from an affiliate is lower than the cost FPC incurred for this service prior to its merger with CP&L, and also that the price is at or below the market value of the service.

FPC will produce documents responsive to this request.

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38. Concerning the Crystal River nuclear unit, please provide, on electronic spreadsheets, the development of the nuclear decommissioning expense and the annual depreciation expense.

FPC objects to this request as irrelevant, immaterial and not reasonably calculated to lead to the discovery of admissible evidence in this proceeding, as the matter has already been determined by the Commission in Docket 001835.

39. Provide any analyses or studies conducted by the Company to examine the potential system benefits of introducing real-time pricing options for its customers.

Other than citing the potential for improving the Company's operating efficiencies and reducing system peak loads, the Company has not conducted any analyses or studies to examine the potential benefits of introducing real-time pricing options for its customers.

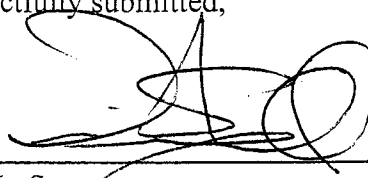
40. Provide all documents supporting your response to Interrogatory No. 36 regarding investigations to establish the market value of affiliate services.

Per response to Interrogatory 36, see response to Citizen's First Set of Production of Documents to FPC Question #13.

See response to Citizen's Second Set of Interrogatories to FPC Question #48.

See MFR C-60.

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 this 22nd day of January, 2002.

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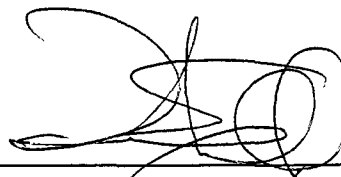
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