

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

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FLORIDA POWER CORPORATION'S OBJECTIONS TO STAFF'S FOURTEENTH SET OF INTERROGATORIES TO FLORIDA POWER CORPORATION (NOS. 318-328)

Pursuant to § 350.0611(1), Fla. Stat. (2000), Fla. Admin. Code R. 28-106.206, and Fla. R. Civ. P. 1.340, Florida Power Corporation ("FPC") objects to The Staff of the Florida Public Service Commission's Fourteenth Set of Interrogatories (Nos. 318-328) and states as follows:

GENERAL OBJECTIONS

FPC objects to any interrogatory that calls for information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time the response is first made to these interrogatories or is later determined to be applicable based on the discovery of documents, investigation or analysis. FPC in no way intends to waive any such privilege or protection.

In certain circumstances, FPC may determine upon investigation and analysis that information responsive to certain interrogatories to which objections are not otherwise asserted are confidential and proprietary and should be produced only under an appropriate confidentiality agreement and protective order, if at all. By agreeing to provide such information in response to such interrogatory, FPC is not waiving its right to insist upon appropriate protection of

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confidentiality by means of a confidentiality agreement and protective order. FPC hereby asserts its right to require such protection of any and all documents that may qualify for protection under the Florida Rules of Civil Procedure and other applicable statutes, rules and legal principles.

FPC objects to these interrogatories and any definitions and instructions that purport to expand FPC's obligations under applicable law.

FPC also objects to these interrogatories to the extent they purport to require FPC to prepare information in a particular format or perform calculations not previously prepared or performed as an attempt to expand FPC's obligations under applicable law. Further, FPC objects to these interrogatories to the extent they purport to require FPC to conduct an analysis or create information not prepared by FPC in the normal course of business. FPC will comply with its obligations under the applicable rules of procedure.

FPC incorporates by reference all of the foregoing general objections into each of its specific objections set forth below as though pleaded therein.

In addition, FPC reserves its right to count interrogatories and their sub-parts (as permitted under the applicable rules of procedure) in determining whether it is obligated to respond to additional interrogatories served by any party.

### **INTERROGATORIES**

- 318. Please refer to Schedule C-12, page 8 of 13 through page 13 and provide an explanation and justification for each increase or decrease from the historical test year December 31, 2000, to the projected test year December 31, 2002, for the accounts listed below. (Moniz, Revell, & Kyle)**

**Customer Acct Exp**  
90715 (Eng Asst Supv)  
90808 (Eng Asst)  
90810 (Cust Asst)  
91015(Cust Asst Misc)  
91211 (Dem Sell-Ind)  
91215 (Mkt Prog)  
91217 (Comm Rel)  
91270 (Pwr Mkt Serv)

**Salaries & Gen Exp**  
92020 (Gen Off Sal)  
92120 (E/A Gen Off)  
92130 (Off Exp)  
92200 (Adm Exp Trans)  
92300 (Outside Serv Emp)

**Prop Ins.**

92430(PropIns N/Nuc)  
92431 (Prop Ins Nuc)

**Inj & Damage**  
92520 (Wkr Comp)  
92525 (Security)  
92640(Med Benf Co)  
92641 (Med Benf Pos)  
92660 (Recr & Educ)

**319. Please give specific examples of expenses included in Account No. 92525 (Security Expenses) on Schedule C-12 page 9 of 13. Does the Company expect the projected amount for 2002 to be effected by the events of September 11, 2001? (Moniz, Revell, & Kyle)**

FPC objects to this question as compound and reserves its right to count this interrogatory as two (2) separate interrogatories for purposes of determining its obligation to continue to provide responses under the order governing procedure in this case.

320. Please describe the expenses that are charged to Account No. 92660 (Recreation and Education Expenses) on C-12 page 10 of 13. (Moniz, Revell, & Kyle)
321. Please explain why the company amortized its rate case expense, for this case, over 2 years. (Moniz, Revell, & Kyle)
322. Please provide copies of all invoices for this rate case that include costs charged to rate case expense through December 31, 2001 (when available). (Moniz, Revell, & Kyle)

FPC objects to this interrogatory to the extent that it requires the production of documents to answer this interrogatory.

323. With respect to Administrative and General expenses (A&G), please provide a revised Schedule C-33 that includes the corresponding jurisdictional amounts and the allocation factor used to determine the jurisdictional amount for each line item for the years ended December 31, 2000, through December 31, 2002. (Moniz, Revell, & Kyle)
324. Please refer to line 27 of Schedule C-33 page 1 of 2 and provide an explanation of the 6.57%, per employee, increase for Payroll and Fringe Benefits from December 31, 2001, to December 31, 2002. (Moniz, Revell, & Kyle)
325. Please refer to C-33, page 1 of 2, Column (A), line 5, explain the type of costs included in the December 31, 2002, amount for Restricted Stock Grant Amortization. (Moniz, Revell, & Kyle)
326. With respect to Pension expense, for the historical year ended 12/31/00, the prior year ending 12/31/01, and the projected test year ending 12/31/02, please state the amount of pension expense recorded on a total company basis and on a jurisdictional basis. (Moniz, Revell, & Kyle)
327. With respect to Other Post Retirement Benefits (OPEB) expense, for the historical year ended 12/31/00, the prior year ending 12/31/01, and the projected test year ending 12/31/02, please state the amount of OPEB expense recorded on a total company basis and on a jurisdictional basis. Also, please state the account and sub-account in which these expenses are recorded.

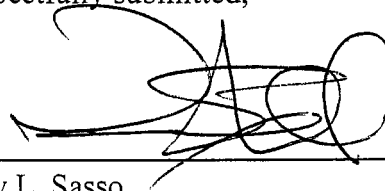
(Moniz, Revell, & Kyle)

FPC objects to this question as compound and reserves its right to count this interrogatory as two (2) separate interrogatories for purposes of determining its obligation to continue to provide responses under the order governing procedure in this case.

**328. For the historical year ended 12/31/00, the prior year ending 12/31/01, and the projected test year ending 12/31/02, does the company have an accumulated unfunded OPEB liability which would require an adjustment to rate base pursuant to Rule 25-14.012(3), Florida Administrative Code? If so, please provide the amount (company and jurisdictional) for each year, the account/sub-account(s) in which the liability is recorded, and describe how the required adjustment has been included in the MFRs.**  
(Moniz, Revell, & Kyle)

FPC objects to this question as compound and reserves its right to count this interrogatory as two (2) separate interrogatories for purposes of determining its obligation to continue to provide responses under the order governing procedure in this case.

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 22<sup>nd</sup> day of January, 2002.

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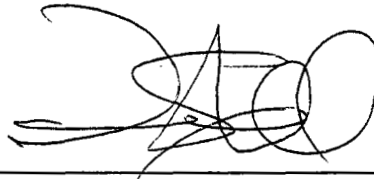
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A handwritten signature in black ink, appearing to read 'Michael B. Twomey', written over a horizontal line.

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