

ORIGINAL

RECEIVED-FPSC

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

02 JAN 28 PM 4: 58

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

COMMISSION CLERK

Submitted for Filing: January 28, 2002

FLORIDA POWER CORPORATION'S RESPONSE TO STAFF'S EIGHTH REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA POWER CORPORATION (NO. 49-52)

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 Staff of the Florida Public Service Commission's ("Staff") Eighth Request for Production subject to the general and specific objections previously filed and states as follows:

DOCUMENTS REQUESTED

- 49. Please provide the workpapers that detail the methodology used to develop the On-Peak Non-Fuel Energy Charges in the RST-1, GST-1, and GSDT-1 rate schedules. (Wheeler)

Information is attached on Table Staff8POD-49.

- 50. Please provide FPC's average per-customer residential kWh consumption by month for the latest available three-year period. (Wheeler)

Information is provided below:

- AUS
CAF
CMP
COM
CTR
ECR
GCL
OPC
MMS
SEC
OTH

DOCUMENT NUMBER-DATE

01075 JAN 28 08

FPSC-COMMISSION CLERK

**Residential Average Monthly Customer
Usage in KWH**

	<u>1999</u>	<u>2000</u>	<u>2001</u>
Jan.	1,080	1,010	1,518
Feb.	848	1,205	1,080
Mar	904	854	878
Apr	921	883	909
May	999	1,014	947
Jun	1,230	1,417	1,319
Jul	1,354	1,489	1,381
Aug	1,588	1,421	1,367
Sep	1,482	1,497	1,481
Oct	1,218	1,178	1,082
Nov	901	859	960
Dec	888	1,044	924

51. In regards to the Tiger Bay settlement approved by Order No. PSC-97-0652-S-EQ, issued June 9, 1997, in Docket No. 970096-EQ, please provide all workpapers for the proposed \$9 million adjustment shown on Schedule C-3c to accelerate the recovery of the Tiger Bay regulatory asset for the projected test year.
(Gardner & P.Lee)

None.

52. Please provide all supporting workpapers for the adjustments to the test year rate base and NOI to reflect the Commission's decision in each of the following dockets: Docket No. 001835-EI and Docket No. 991931-EI. (Gardner & P.Lee)

FPC will produce documents responsive to this request.

Respectfully submitted,



James A. McGee
FLORIDA POWER CORPORATION
Post Office Box 14042
St. Petersburg, FL 33733-4042
Telephone: (727) 820-5184
Facsimile: (727) 820-5519

Gary L. Sasso
James Michael Walls
Jill H. Bowman
W. Douglas Hall
CARLTON FIELDS, P. A.
Post Office Box 2861
St. Petersburg, FL 33731
Telephone: (727) 821-7000
Facsimile: (727) 822-3768
Attorneys for Florida Power Corporation

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 28th day of January, 2002.

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

Jack Shreve, Esquire
Public Counsel
John Roger Howe, Esquire
Charles J. Beck, Esquire
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison St., Room 812
Tallahassee, FL 32399-1400
Phone: (850) 488-9330
Fax: (850) 488-4491
Attorneys for the Citizens of the State of
Florida

Daniel E. Frank
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2415
Telephone: (202) 383-0838
Fax: (202) 637-3593
Counsel for Walt Disney World Co.

Russell S. Kent, Esq.
Sutherland Asbill & Brennan LLP
2282 Killlearn Center Blvd.
Tallahassee, FL 32308-3561
Telephone: (850) 894-0015
Fax: (850) 894-0030
Counsel for Walt Disney World Co.

Thomas A. Cloud, Esq.
Gray, Harris & Robinson, P.A.
301 East Pine Street, Ste. 1400
P.O. Box 3068
Orlando, FL 32801
Phone: (407) 244-5624
Fax: (407) 244-5690
Attorneys for Publix Super Markets, Inc.

Joseph A. McGlothlin, Esquire
Vicki Gordon Kaufman, Esquire
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
117 South Gadsden
Tallahassee, FL 32301
Telephone: (850) 222-2525
Fax: (85) 222-5606
Counsel for Florida Industrial Power Users
Group and Reliant Energy Power Generation,
Inc.

John W. McWhirter, Jr., Esquire
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
400 North Tampa Street, Suite 2450
Tampa, FL 33601-3350
Telephone: (813) 224-0866
Fax: (813) 221-1854
Counsel for Florida Industrial Power Users
Group

Michael B. Twomey, Esq.
8903 Crawfordville Road (32305)
P.O. Box 5256
Tallahassee, FL 32314-5256
Phone: (850) 421-9530
Fax: (850) 421-8543
Counsel for Sugarmill Woods Civic
Association, Inc. and Buddy L. Hansen



Attorney