

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 RESPONSE TO STAFF'S TWELFTH SET OF INTERROGATORIES TO FLORIDA POWER CORPORATION (NOS. 290-295)

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") responds to The Staff of the Florida Public Service Commission's Twelfth Set of Interrogatories (Nos. 290-295) subject to the general and specific objections previously filed and states as follows:

INTERROGATORIES

290. Provide the annual expenses incurred for anti-terrorism security measures at the company's power plants for calendar years 1997, 1998, 1999, 2000, and 2001 year to date. Include in your response both the annual amount included in rate base and the annual amount included in O&M.(McNulty)

Prior to 9/11/01 Florida Power did not classify any security measures specifically as anti-terrorism. For the remainder of 2001, FPC projected to incur an additional O&M expense of \$300,000 for increased security at its power plants.

291. Provide the annual expenses incurred for anti-terrorism security measures at the company's transmission facilities for calendar years 1997, 1998, 1999, 2000, and 2001 year to date. Include in your response both the annual amount included in rate base and the annual amount included in O&M. (McNulty)

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Prior to 9/11/01 Florida Power did not classify any security measures specifically as anti-terrorism. For the remainder of 2001, FPC projected to incur an additional O&M expense of \$250,000 and an additional \$130,000 included in rate base for increased security at its transmission facilities.

- 292. Provide the annual system and jurisdictional expenses incurred for anti-terrorism security measures for calendar years 1997, 1998, 1999, 2000, and 2001 year to date. Include in your response both the annual amount included in rate base and the annual amount included in O&M. (McNulty)**

Prior to 9/11/01 Florida Power did not classify any security measures specifically as anti-terrorism. For the remainder of 2001, FPC is projecting to incur system O&M and rate base anti-terrorism expenses of \$550,000 and \$130,000 respectively. Jurisdictional expenses would be \$500,000 for O&M and \$120,000 for rate base.

- 293. What is the projected test year system and jurisdictional amounts for anti-terrorism security that is included in the MFRs? (McNulty)**

There are no anti-terrorism security dollars included in the MFR's. Refer to Mark Myer's November 15th testimony, Exhibit 5 for the O&M and rate base amounts sought in the test year.

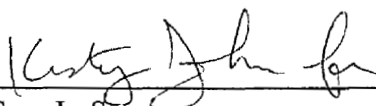
- 294. If the company has completed its review of potential increased anti-terrorism expenses due to recent events, then provide an annualized amount of the short term expense level and an annualized amount of the long term expenses for increased anti-terrorism security measure due to recent events. Include in your response a listing of the reports, studies, and consultants used in determining the projected amounts. (McNulty)**

See response to Question #295

295. If the company has not completed its review of potential increased anti-terrorism expenses due to recent events, please provide the date when the review will be completed. (McNulty)

The final review of potential increased anti-terrorism expenses is expected to be complete by June 1, 2002.

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 4th day of February, 2002.

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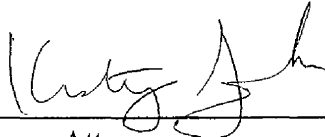
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