

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: February 8, 2002

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FLORIDA POWER CORPORATION'S OBJECTIONS TO STAFF'S FIFTEENTH SET OF INTERROGATORIES TO FLORIDA POWER CORPORATION (NOS. 329-340)

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 Fifteenth Set of Interrogatories (Nos. 329-340) 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

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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

329. Did FPC take the merger with Carolina Power & Light into account in budgeting its O&M expenses? (Colson)

330. If the answer to Interrogatory No. 329 is no, what dollar amount of savings will be realized as a result of the merger with respect to Distribution and Transmission O&M costs, and what assumptions has FPC made to come up with that amount of savings?

331. Refer to MFR Schedule C-34. What will be the revenues associated with Hines II in 2002, since it will not be on line until 2003? (Colson)

332. What effect will Hines II have on revenues for the year 2002 and 2003? (Colson)

333. **Other Power Generation - Operations.** Refer to MFR Schedule C-12, page 6. Explain in detail, what factors cause the Misc. Other Power Generation expenses to increase from 3,444,000 to 7,527,000 since 1997. (Colson)

334. **Other Power Generation - Operations.** Refer to Schedule C-12, page 6. Explain in detail, what factors cause the Operation Supervisor and Engineer expenses to increase from \$2,732,000 to \$11,249,000 since 1997. (Colson)

335. **Other Power Supply Expenses - Operations.** Refer to MFR Schedule C-12, page 6. Explain in detail, what factors cause the System Control & Load Dispatch to decrease from \$1,908,000 to \$15,000 since 1997. (Colson)

336. **Transmission - Operations.** Refer to Schedule C-12, page 6. Explain in detail, what factors cause the expenses associated with transmission of electricity by other to disappear. (Colson)

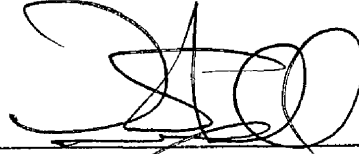
337. **Transmission - Maintenance.** Refer to Schedule C-12, page 12. Explain in detail, what factors cause the Maintenance Overhead Lines - 69KV expenses to increase from \$1,185,000 to \$6,292,000 since 1997. (Colson)

338. **Transmission - Maintenance.** Refer to Schedule C-12, page 12. Explain in detail, what factors cause the Maintenance - Other Substation expenses to increase from \$3,517,000 to \$8,345,000 since 1997. (Colson)

339. **Distribution - Maintenance.** Refer to Schedule C-12, page 12. Explain in detail, what factors cause the Maintenance - Other Substation expenses to increase from \$2,928,000 to \$7,968,000 since 1997. (Colson)

340. Distribution - Maintenance. Refer to Schedule C-12, page 12. Explain in detail, what factors cause the Maintenance Supervisor & Engineering expenses to increase from \$995,000 to \$3,082,000 since 1997. (Colson)

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 8th day of February, 2002.

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