

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 18, 2002

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FLORIDA POWER CORPORATION'S OBJECTIONS TO STAFF'S SEVENTEENTH SET OF INTERROGATORIES TO FLORIDA POWER CORPORATION (NOS. 372-390)

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 Seventeenth Set of Interrogatories (Nos. 372-390) 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.

Pursuant to subsequent correspondence with Staff, they have advised FPC that no response is necessary to interrogatory numbers 381-390 contained in the request. FPC does not waive the right to object to these interrogatories, in the event that a response is necessary in the future.

INTERROGATORIES

372. Please describe FPC's current complaint resolution processes regarding the following:

- A. All complaints received directly from FPC consumers.**

- B. All complaints received from the Florida Public Service Commission.
(P. Lowery)**

373. Please provide the amount of revenues and expenses recoverable through the capacity cost recovery clause in the 2002 test year budget and reconcile any difference, if any, with the amount filed in Docket No. 010001-EI, part D. (D.Lee)

374. Please provide the annual amount related to Tiger Bay agreements recoverable through the capacity cost recovery clause in 2002 through 2005, and its regulatory treatment pursuant to Order No. PSC-97-0652-S-EQ, in Docket No. 970096-EQ. (D.Lee)

375. Please indicate for the test year the number of customers taking service under the following rate schedules (assuming that the IS-1, IST-1, CS-1 and CST-1 rate schedules are not closed):

- A. IS-1**
- B. IST-1**
- C. CS-1**
- D. CST-1**
- E. IS-2**
- F. IST-2**
- G. CS-2**
- H. CST-2 (Wheeler)**

376. Please provide the number of customers FPC has proposed to transfer from rate schedule IS-1 to IS-2 who would not qualify for service based on the proposed revised applicability provision for IS-2 that requires customers to have a minimum monthly billing demand of 500 kw. (Wheeler)


377. Please provide the number of customers FPC has proposed to transfer from rate schedule IST-1 to IST-2 who would not qualify for service based on the proposed revised applicability provision for IST-2 that requires customers to have a minimum monthly billing demand of 500 kw. (Wheeler)

378. Please provide the number of customers FPC has proposed to transfer from rate schedule CS-1 to CS-2 who would not qualify for service based on the proposed revised applicability provision for CS-2 that requires customers to have a minimum monthly billing demand of 500 kw. (Wheeler)

379. Please provide the number of customers FPC has proposed to transfer from rate schedule CST-1 to CST-2 who would not qualify for service based on the proposed revised applicability provision for CST-2 that requires customers to have a minimum monthly billing demand of 500 kw. (Wheeler)

380. For each IS-1, IST-1, CS-1, and CST-1 customer that FPC is proposing to transfer to IS-2, IST-2, CS-2 and CST-2, respectively, please provide the percentage increase in their total bill that will result from the reduction in the interruptible or curtailable credits to the level proposed by FPC, based on the latest available 12 months of billing data. Also indicate the increase to each rate class overall. (Wheeler)

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 18th day of February, 2002.

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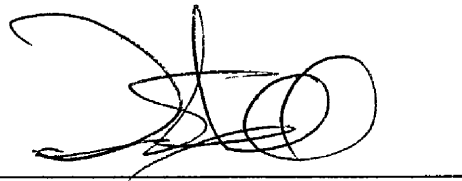
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A handwritten signature in black ink, appearing to read "Michael B. Twomey", is written over a horizontal line.

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