

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 18, 2002

RECEIVED FPSC COMMISSION CLERK 02 FEB 18 PM 4:32

FLORIDA POWER CORPORATION'S RESPONSE TO CITIZENS' THIRTEENTH REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA POWER CORPORATION (NOS. 151-153)

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 Florida's Citizens ("Citizens") Thirteenth Request for Production of Documents (Nos. 151-153) subject to the general and specific objections previously filed and states as follows:

DOCUMENTS REQUESTED

151. Please provide all invoices and statements, including all billing detail, you have received from attorneys, consultants, contractors and others related to expenses you intend to include in rate case expense. Your response should include all documents showing hours worked and hourly rates for services.

FPC will produce documents responsive to this request.

152. Please provide all documents in your possession, custody or control discussing or containing "lessons learned" from tropical storm Gabrielle. (see deposition of Robert A. Sipes, P.E.).

FPC will produce documents responsive to this request.

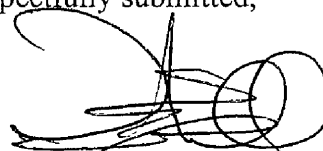
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153. Please provide all monthly power quality and reliability reports for 2000 and 2001, and the annual reports for 2000 and 2001. (see deposition of Robert A. Sipes, P.E.).

FPC will produce documents responsive to this request.

RECEIVED FILED RLM DOCUMENT NUMBER-DATE 01887 FEB 18 08 FPSC-BUREAU OF RECORDS FPSC-COMMISSION CLERK

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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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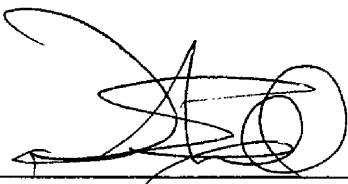
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