

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 21, 2002

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FLORIDA POWER CORPORATION'S RESPONSES TO PUBLIX SUPER MARKETS, INC.'s THIRD REQUEST TO PRODUCE TO FLORIDA POWER CORPORATION

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 Publix Super Market, Inc. ("Publix") Third Set of Requests for Production of Documents (Nos. 18-26) subject to the previously filed general and specific objections and provides the following responses based upon the only additional witnesses identified by Florida Power Corporation – Scott Wilson – and states as follows:

DOCUMENTS REQUESTED

18. All direct, rebuttal, or sir-rebuttal testimony filed by the expert in the last five (5) years relating to the same and/or similar topic on which the expert is filing testimony in this proceeding.

See FPC's response to Publix's Third Set of Interrogatories number 50(f)..

19. All workpapers, spreadsheets, electronic files, or other materials referred to and/or relied upon by the expert in the course of preparing his/her testimony in this proceeding.

FPC will produce documents responsive to this request.

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MMS
SEC
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20. All databases (in electronic format) used by the expert in the course of preparing his/her testimony in this proceeding.

None.

21. All articles published or submitted for publication by the expert in the last five (5) years on the same topic and/or a topic similar to the one that the expert is filing testimony on in this proceeding.

None.

22. All texts, treatises, textbooks, or other materials referred to and/or relied upon by the witness in the course of preparing his/her testimony in this proceeding.

See workpapers.

23. All documents, spreadsheets, data, on disk if available, used by the witness in the development of exhibits to his/her testimony, if any.

See rebuttal testimony and workpapers.

24. All source documents used to create the exhibits to the witness' testimony.

See workpapers.

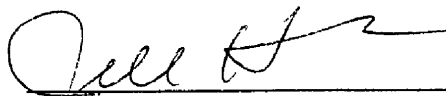
25. All orders in your possession, custody or control issued by state regulatory commissions on merger related issues.

See workpapers.

26. All documents or other materials reviewed for any purpose, even if not relied on, by the witness in the course of preparing his/her testimony in this proceeding.

See workpapers.

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 on February 21, 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
Phone: (202) 383-0838
Fax: (202) 637-3593
Counsel for Walt Disney World Co.

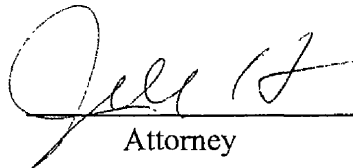
Russell S. Kent, Esq.
Sutherland Asbill & Brennan LLP
2282 Killearn Center Blvd.
Tallahassee, FL 32308-3561
Phone: (850) 894-0015
Fax: (850) 894-0030
Counsel for Walt Disney World Co.

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
Phone: (850) 222-2525
Fax: (850) 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
Phone: (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