## 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 22, 2002

## FLORIDA POWER CORPORATION'S RESPONSE TO STAFF'S ELEVENTH REQUEST FOR PRODUCTION OF DOCUMENTS TO **FLORIDA POWER CORPORATION (NO. 56)**

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") response to the Staff of the Florida Public Service Commission's ("Staff") Eleventh Request for Production (No. 56) and states as follows:

## **DOCUMENTS REQUESTED**

**56.** Please provide all workpapers and/or analyses FPC relied on to determine that an inverted rate design encourages energy efficiency and conservation.

The Company has no specific workpapers and/or analyses and agrees with the Commission's finding related to FP&L's inverted residential rate in its final rate order for FP&L in Docket No. 830465-EI, "that inverted rates are intuitively conservation oriented."

AUS	
CAF	
CMP	
COM	
CTR	
<b>ECR</b>	
GCL	
OPC	
MMS	
SEC	
OTH	

POLIMERT NO 02142-02 Feb 22, 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 on February 22, 2002.

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