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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 25, 2002
COMMISSION CLERK

FLORIDA POWER CORPORATION'S OBJECTIONS TO STAFF'S FIFTEENTH REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA POWER CORPORATION (NO. 89 - 99)

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") objects to the Staff of the Florida Public Service Commission's ("Staff") Fifteenth Request for Production (No. 89-99) and states as follows:

FPC notes for the record that Staff's Fifteenth Request for Production of Documents was served out-of-time as it relates to the discovery cut-off established by the Order Establishing Procedure in this matter. However, FPC has agreed as an accommodation to the Commission Staff to respond to these interrogatories on an expedited basis.

GENERAL OBJECTIONS

FPC objects to any request that calls for the production of documents protected by the

- AUS _____ attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret
- CAF _____
- CMP _____
- COM _____ privilege, or any other applicable privilege or protection afforded by law, whether such privilege or
- CTR _____
- ECR _____ protection appears at the time the response is first made to these requests or is later determined to
- GCL I
- OPC _____
- MMS _____ be applicable based on the discovery of documents, investigation or analysis. FPC in no way intends
- SEC I
- OTH _____ to waive any such privilege or protection.

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FPSC BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

In certain circumstances, FPC may determine upon investigation and analysis that documents that respond to certain requests 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 produce documents in response to this request, FPC is not waiving its right to insist upon appropriate protection of 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 further objects to these requests and any definitions or instructions that purport to expand FPC's obligations under applicable law.

FPC objects to any request that requires the production of "all" or "each" as it cannot give assurances, even after a good faith and reasonably diligent attempt, that "all" or "each" responsive document will be found. Indeed, it may well be impossible to assure compliance with the exercise of reasonable diligence.

FPC incorporates by reference all of the foregoing general objections into each of its specific objections set forth below as though pleaded therein.

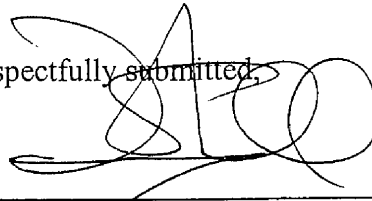
Moreover, to the extent documents responsive to the requests have been previously produced, FPC will not be reproducing these documents but will attempt to make appropriate cross-references between and amongst the various requests.

DOCUMENTS REQUESTED

89. Please provide all direct or rebuttal testimony filed by witness Wilson in the last five years relating to the same or similar topic on which he has filed testimony in this proceeding.

90. Please provide all workpapers, spreadsheets, electronic files, or other materials referred to or relied upon by witness Wilson in the course of preparing his testimony in this proceeding.
91. Please provide all databases used by witness Wilson in the course of preparing his testimony in this proceeding.
92. Please provide all articles published or submitted for publication by witness Wilson in the last five (5) years on the same topic or a topic similar to the one that he has filed testimony in this proceeding.
93. Please provide all texts, treatises, textbooks, or other materials referred to and/or relied upon by witness Wilson in the course of preparing his testimony in this proceeding.
94. Please provide all documents, spreadsheets, data, on disk if available, used by witness Wilson in the development of exhibits to his testimony, if any.
95. Please provide all source documents used to create the exhibits to witness Wilson's testimony.
96. Referring to page 11 of witness Wilson's testimony, lines 17 – 18, please provide a complete copy of the Standard & Poor's report referenced in those lines.
97. Referring to page 19 of witness Wilson's testimony, lines 7 – 8, please provide a copy of the source document he relied upon for the S&P range he cites.
98. Referring to page 21 of witness Wilson's testimony, lines 20 – 21, please provide a copy of the source document for the \$440 million off-balance sheet debt equivalent amount he cites.
99. Provide a copy of each state regulatory commission order identified in the response to Interrogatory No. 395.

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 25, 2002.

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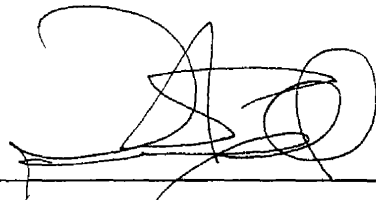
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