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March 6, 2002

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

VIA FEDERAL EXPRESS

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

Dear Ms. Bayo:

Florida Power Corporation ("FPC" or the "Company") is filing the original and one (1) copy of the following document:

- 1. Florida Power Corporation's Notice of Filing (Affidavit of Mark A. Myers)..

We request you acknowledge receipt and filing of the above by stamping the additional copy of this letter and returning it to me in the self-addressed, stamped envelope provided.

If you or your Staff have any questions regarding this filing, please contact me at (727) 821-7000.

Very truly yours,

Julie H. Bowman
Julie H. Bowman

AUS _____
CAF _____enclosures
CMP _____
COM _____
CTR _____
ECR _____
GCL _____
OPC _____
MMS _____
SEC _____
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DOCUMENT NUMBER-DATE

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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

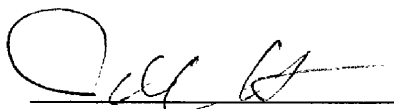
Submitted for Filing:
March 7, 2002

FLORIDA POWER CORPORATION'S NOTICE OF FILING

Florida Power Corporation ("Florida Power") hereby gives notice of filing the original Affidavit of Mark A. Myers, as Florida Power Corporation's Vice President, Finance in support of Florida Power Corporation's Sixth Request For Confidential Classification submitted for filing on March 4, 2002.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to all counsel listed on the attached service list via U.S. Mail this 6th day of March, 2002.

Respectfully submitted,



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DOCKET NO. 000824 -- SERVICE LIST

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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:
March 4, 2002

AFFIDAVIT OF MARK A. MYERS

**STATE OF FLORIDA
COUNTY OF PINELLAS**

I, Mark A. Myers, having first been duly sworn, do hereby state as follows:

1. My name is Mark A. Myers. I am employed by Florida Power Corporation ("Florida Power" or "the Company") as Vice President of Finance. The facts stated in this affidavit are based upon my personal knowledge.

2. I have reviewed the Sixth Request for Confidential Classification to which this affidavit is attached and the Justification Matrices identifying the confidential rebuttal testimony of Mark A. Myers, Charles J. Cicchetti and Robert A. Sipes ("the Testimony"). The confidential information identified in the matrices is intended to be confidential and is treated by Florida Power and its related companies as confidential. None of the confidential information has been publicly disclosed.

3. Public disclosure of the confidential information would harm the Company and its ratepayers and would impair the Company's competitive interests. The Sixth Request for Confidential Classification and the Justification Matrices accurately describe the harm to the Company and its ratepayers that would be caused by public disclosure of the confidential information.

4. The Testimony references internal projections of future financial performance prepared in connection with and in anticipation of the merger, including projected profit margins and projected synergies for Progress Energy's regulated and non-regulated industries. The projections were prepared solely for internal use by management (both CP&L and Florida Power) in analyzing the potential impacts of the merger and the potential performance of the consolidated company under various scenarios. The projections have been kept strictly confidential.

5. Because these projections have not been publicly disclosed, they likely would be closely scrutinized by financial analysts and could encourage market speculation about the Company's future financial performance. This could impact the Company's credit rating, which in turn would directly affect the Company's cost of capital, thus harming both the Company and its ratepayers.

6. Moreover, financial projections are necessarily based on a host of assumptions that change over time. If an assumption proves to be inaccurate in any material respect, the projection is likewise inaccurate. The projections at issue here were intended solely for internal use by Company management who understand the limitations of financial forecasting. The projections were never intended to be disseminated to the public, where the Company has no ability to explain the underlying assumptions and how they may have changed since the forecasts were prepared.

7. Disclosure of confidential internal financial information also raises questions about compliance with the SEC fair disclosure requirements imposed by "Regulation FD." *See* 17 CFR §243.100. The projections have been kept confidential, and if it is made public in this proceeding, the Company may have an obligation to take steps to ensure that there can be no

claim of selective disclosure. If the Company is required to affirmatively publicize the forecasts, it would give the incorrect impression that they were intended for public dissemination, when they in fact were never intended to be used by the public to evaluate the Company's future financial performance. The resulting potential for market confusion and speculation would be very damaging to the Company and its ratepayers.

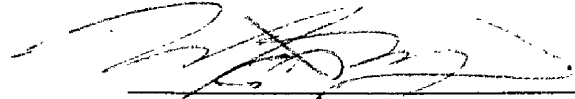
8. Florida Power also requests confidential classification for the Testimony outlined in the attached Justification Matrix that refers to information obtained from PA Consulting Group ("PA") and Edison Electric Institutes ("EEI"). EEI and PA are independent businesses that provide industry analyses to Florida Power. The information referenced in the Testimony is PA's and EEI's proprietary industry analyses obtained by Florida Power pursuant to an understanding that Florida Power shall keep the information confidential. This is proprietary information developed by EEI and PA, which it provides pursuant to an understanding that requires the information to be kept confidential. The information is not public and Florida Power has treated this information as confidential.

9. Disclosure of this information would also impair EEI's and PA's competitive interests, as the data would lose its proprietary value if it were to become public record.


10. Public disclosure of this information also would undermine Florida Power's ability to obtain the information in the future, as EEI and PA may refuse to provide proprietary data to Florida Power if that data could become public record and thus be available for free to anyone. Florida Power routinely uses industry analyses developed by EEI and PA in its business operations, and not having access to that information would harm the Company's business operations.

11. For all of these reasons, the Testimony should be kept confidential to avoid harm to the Company and its ratepayers.

This concludes my affidavit.


MARK A. MYERS

Sworn to and subscribed before me this 5th day of March, 2002, by Mark A. Myers, who is personally known to me or who has produced _____ as identification:


NOTARY PUBLIC

ANNE M. SHELOSKI
Type or Print Name

My Commission Expires: 4-12-02



Anne M. Sheloski
MY COMMISSION # CC725907 EXPIRES
April 12, 2002
BONDED THRU TROY FAIN INSURANCE, INC.