# ORIGINAL

## **BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

)

In re: Petition for Determination of Need of Hines Unit 3 Power Plant.

Docket No.: 020953-EI



Submitted for Filing: November 25, 2002

## NOTICE OF CORRECTION TO FLORIDA POWER'S OBJECTIONS TO FLORIDA PARTNERSHIP FOR AFFORDABLE COMPETITIVE ENERGY'S FIRST <u>SET OF INTERROGATORIES TO FLORIDA POWER</u>

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" or "Florida Power") files this correction to its

previously-filed objections to Florida Partnership for Affordable Competitive Energy's

("PACE"), First Set of Interrogatories. FPC's objection to Interrogatory No. 54 was

inadvertently omitted from its original filing and is set forth below:

# **INTERROGATORIES**

Interrogatory No. 54:

Please identify all analyses performed by or for FPC of stranded benefits or stranded costs relating to FPC's proposed Hines 3 unit, including risk exposure (a) to FPC; and (b) to FPC's retail customers under any scenario considered. In identifying any such analyses, please state whether such analyses addressed the revenue requirements impact on FPC's customers of the various risks considered, who performed such analyses, when such analyses were performed, and who now has possession of all such analyses in any format. If FPC performed no such analyses, please so state.

**TFPC** objects to this interrogatory as irrelevant, immaterial, outside the scope of this need

proceeding and not reasonably calculated to lead to the discovery of admissible evidence.

RECEIN AU OF RECORDS

DOCUMENT NUMBER-DATE

12876 NOV 25 8

FPSC-COMMISSION CLERK

Respectfully submitted this 25th day of November 2002.

JAMES A. MCGEE Associate General Counsel PROGRESS ENERGY SERVICE COMPANY, LLC P.O. Box 14042 St. Petersburg, Florida 33733 Telephone: (727) 820-5184 Facsimile: (727) 820-5519 GARY L. SASSO Florida Bar No. 622575 JILL H. BOWMAN Florida Bar No. 057304 CARLTON FIELDS, P.A. Post Office Box 2861 St. Petersburg, FL 33731 Telephone: (727) 821-7000 Facsimile: (727) 822-3768

- and –

W. DOUGLAS HALL Florida Bar No. 347906 CARLTON FIELDS, P.A. Post Office Drawer 190 Tallahassee, FL 32302-0190 Telephone: (850) 222-1585 Facsimile: (850) 224-9191

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT a true and correct copy of the foregoing has been served by

Facsimile and U.S. Mail to the parties with an asterisk by their name; and by U.S. Mail to the

other interested parties of record as listed below on this 25th day of November 2002.

Attorney

### PARTIES OF RECORD:

\*Lawrence Harris and Marlene Stern Legal Division Florida Public Service Commission Gunter Building 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Buck Oven Siting Coordination Office Department of Environmental Protection 2600 Blairstone Road Tallahassee, FL 32301 Telephone: 850-487-0472

Greg Holder, Regional Director Fish & Wildlife Conservation Commission 3900 Drane Field Rd. Lakeland, Fl 33811-1299 Telephone: (863) 648-3203

James A. McGee Associate General Counsel Progress Energy Service Co., LLP P. O. Box 14042 St. Petersburg, FL 33733 Telephone: (727) 820-5184 Facsimile: 727-820-5519 Paul Darst Department of Community Affairs Division of Resource Planning/Mgmt. 2555 Shumard Oak Blvd. Tallahassee, FL 32399-2100 Telephone: 850-488-4925

Paul Lewis, Jr. Florida Power Corporation 106 East College Avenue, Suite 800 Tallahassee, FL 32301-7740 Telephone: 850-222-8738 Facsimile: 850-222-9768

Vincent Akhimie Polk County Board of Commissioners P. O. Box 2019 Bartow, FL 33831 Telephone: 863-534-6039 Facsimile: 863-534-6059

R. Douglas Leonard Regional Planning Council 07 555 E. Church Street Bartow, FL 33830-3931 Telephone: 863-534-7130 Facsimile: 863-534-7138 St. Johns River Water Management District P. O. Box 1429 Palatka, FL 32178-1429 Telephone: 386-329-4500 Facsimile: 386-329-4485

Patty DiOrio CPV Pierce, Ltd. 35 Braintree Hill Office Park Suite 107 Braintree, MA 02184

\*Jon Moyle, Jr. Moyle Law Firm The Perkins House 118 North Gadsden Street Tallahassee, FL 32301 Telephone: (850) 681-3828 Facsimile: (850) 681-8788 Myron Rollins Black & Veatch Post Office Box 8405 Kansas City, MO 64114 Telephone: (913) 458-2000 Facsimile: (913) 339-2934

Bruce May Holland & Knight Post Office Drawer 810 Tallahassee, FL 32302-0810 Telephone: (850) 224-7000 Facsimile: (850) 224-8832

Michael Green Florida Partnership for Affordable Competitive Energy 1049 Edminston Place Longwood, FL 32779 Telephone: (407) 389-0994 Facsimile: (407) 865-5639