

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

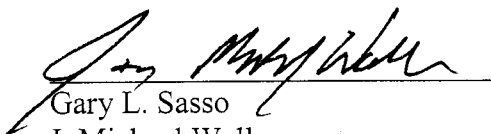
**In re: Petition for Determination
of Need of Hines Unit 2 Power Plant.**)
)
)
_____)

Docket No.: 001064-EI

Submitted for Filing: September 15, 2000

**FLORIDA POWER CORPORATION'S
NOTICE OF SERVICE**

Florida Power Corporation, through its undersigned attorneys, hereby gives notice of service of Florida Power Corporation's First Set of Interrogatories to Staff via Federal Express to Deborah Hart, as counsel for Florida Pulic Service Commission and via U.S. Mail to all other parties of record this 14th day of September, 2000.



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APP _____
CAF _____
CMP _____
COM _____
CTR _____
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OPC _____
PAI _____
RGO _____
SEC _____
SER _____
OTH _____

PARTIES OF RECORD:

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**FLORIDA POWER CORPORATION'S
FIRST SET OF INTERROGATORIES TO STAFF**

Pursuant to Rule 1.340, Florida Rules of Civil Procedure, and Rule 28-106.206, Florida Administrative Code, Florida Power Corporation ("FPC") hereby serves its First Set of Interrogatories on the Staff of the Florida Public Service Commission ("PSC Staff").

DEFINITIONS

For purposes of these interrogatories, the following definitions apply:

A. "And" and "or" shall be construed in the disjunctive or conjunctive as necessary in order to bring within the scope of each request all documents which might otherwise be construed to be outside its scope.

B. "Communication" shall mean any oral or written utterance, notation or statement of any nature whatsoever, by and to whomever made, including, but not limited to, correspondence, conversations, dialogues, discussions, interviews, meetings, consultations, agreements, and other understandings between or among two or more people.

C. "You" or "your" means the Staff of the Florida Public Service Commission and any of its agents, employees, representatives, or other person acting or purporting to act on behalf of the Staff of the Florida Public Service Commission.

D. "Project" means the FPC Hines 2 power plant at the Hines Energy Complex in Polk County, Florida on which FPC based its petition for a determination of need to the Florida Public Service Commission in this Docket.

E. "PSC" means the Florida Public Service Commission.

F. "PSC Staff" means the Staff of the Florida Public Service Commission.

INSTRUCTIONS

A. If any interrogatory calls for a document or non-written communication which you claim to be privileged, state the grounds upon which the claim of privilege is made and identify each document or non-written communication. In identifying such document or communication, you may substitute for a summary of its contents, principal terms or provisions, a statement of the subject matter to which it relates. The fact that an interrogatory calls in part for documents or non-written communications which you claim to be privileged is not a basis for you to fail to identify fully all documents or non-written communications called for by such interrogatory as to which no privilege is claimed.

B. If you cannot answer any interrogatory fully and completely after exercising due diligence to make inquiry and secure the information to do so, please so state and answer the interrogatory to the extent you deem possible. Specify the portion of such interrogatory you claim you are unable to fully and completely answer, and further specify the facts on which you rely to support your contention that you are unable to answer the interrogatory fully and completely.

C. Please use the space provided for your answer, if adequate; if not, attach additional sheets with the required information.

INTERROGATORIES

1. To the extent that the testimony filed by or on behalf of the PSC Staff in this docket contains any opinions, please provide the factual and legal bases considered and accepted in formulating those opinions.

2. To the extent that the testimony filed by or on behalf of the PSC Staff in this docket contains any opinions, please provide the factual and legal bases considered and rejected in formulating those opinions.

FPC'S FIRST SET OF INTERROGATORIES TO STAFF
(NOS. 1 – 6)
DOCKET NO. 001064-EI

3. To the extent that the testimony filed by or on behalf of the PSC Staff in this docket contains any opinions, please describe what compensation was provided, if any, to the witness providing those opinions.

4. To the extent that the testimony filed by or on behalf of the PSC Staff in this docket contains any opinions, please describe the qualifications, if any, of the witness providing those opinions, including but not limited to all education and experience, a list of the publications authored by the witness within the preceding five (5) years, and a list of any other cases and proceedings in which the witness has testified as an expert at trial, by deposition, or by affidavit in the preceding five (5) years.

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5. To the extent that any computer models were relied on in any way in the preparation of the testimony filed by or on behalf of the PSC Staff in this docket, please (a) describe the computer model(s) used; (b) identify by whom the model(s) was used; (c) identify all inputs and assumptions used in the model(s); (d) describe the results or output of all runs using the computer model(s); (e) describe in detail any sensitivity analyses that were conducted by the PSC Staff; and (f) describe or list all backup or source material.

6. To the extent that either (i) the testimony does not explicitly contain the answer or (ii) the answer has not been provided in response to any of the preceding interrogatories, please identify the factual and legal bases for the testimony filed by or on behalf of the PSC Staff in this docket.

FPC'S FIRST SET OF INTERROGATORIES TO STAFF
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I HEREBY CERTIFY that I am authorized to answer these interrogatories on behalf of the Staff of the Florida Public Service Commission, and that the answers to these interrogatories are true and correct.

By: _____
As Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME THE UNDERSIGNED AUTHORITY, personally appeared _____, who, being first duly sworn, deposes and says that he/she has read the foregoing answers and that they are true.

SWORN AND SUBSCRIBED BEFORE ME THIS _____ day of _____, 2000.

(Affix Seal)

Notary Public

Printed Name

Commission Expiration Date

Serial Number