

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No.: 001064-EI

)  
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Submitted for Filing: October 10, 2000

**FLORIDA POWER CORPORATION'S  
RESPONSE TO STAFF'S FIRST REQUEST  
FOR PRODUCTION OF DOCUMENTS (NOS. 1 – 10)**

Florida Power Corporation, through its undersigned attorneys responds to Staff's First Request for Production of Documents to Florida Power Corporation (Nos. 1 – 10), subject to its general and specific objections filed with the Commission on September 18, 2000, as set forth below.

**PRODUCTION REQUESTS**

1. Referring to page 12 of the testimony of John Crisp, please provide the work papers and documentation used as a basis for the answer to the question in lines 18 and 19. (The answer continues to page 15.)

FPC will produce the non-privileged documents responsive to this request.

2. Referring to page 21 of the Need Study, please provide all workpapers and documentation used to develop the financial assumptions.

FPC will produce the non-privileged documents responsive to this request.

3. Please provide copies of all reports or reviews for Florida Power Corporation or Florida Progress Corporation that refer to the Hines 2 Power Plant and that were prepared by or for investment banking firms.

Florida Power or Florida Progress did not prepare any reports or reviews for investment banking firms that refer to the Hines 2 power plant.

DOCUMENT NUMBER-DATE

12902 OCT 10 08

FPSC-RECORDS/REPORTING

**4. Please provide the most recent credit report for Florida Power Corporation prepared by Standard and Poor's.**

The most recent credit report for Florida Power prepared by Standard and Poor's is attached.

**5. Please provide the most recent credit report for Florida Power Corporation prepared by Moody's Investor Services.**

The most recent credit report for Florida Power prepared by Moody's Investor Services is attached.

**6. For the 12 months ending August 31, 2000, please provide all reports, analyses, reviews, and information prepared by or for Florida Power Corporation and provided or sent to Standard and Poor's.**

Florida Power did not prepare or have prepared any reports, analyses, reviews, or information for Standard and Poor's during the 12 months ending August 31, 2000.

**7. For the 12 months ending August 31, 2000, please provide all reports, analyses, reviews, and information prepared by or for Florida Power Corporation and provided or sent to Moody's Investor Services.**

Florida Power did not prepare or have prepared any reports, analyses, reviews, or information for Moody's Investor Services during the 12 months ending August 31, 2000.

**8. Refer to page 40 of Exhibit JBC-1, the Need Study. Provide all documents supporting the statement "These conclusions were initially tested using specific targeted financial assessments. . .".**

FPC will produce the non-privileged documents responsive to this request.

**9. Refer to page 47 of Exhibit JBC-1, the Need Study. Provide all documents supporting the statement "These contract benefits represent somewhere between a \$20 to**

**\$40 million advantage to FPC's ratepayers over current market prices for the exact same combined cycle technology."**

Without waiving its objections filed separately on September 18, 2000, FPC states that the \$20 to \$40 million advantage to FPC's ratepayers over current combined cycle market prices were based on a 1998/99 Black & Veatch (B&V) Technology Review Report. The attached section 6.4 and Tables 28, 29, and 41 from this B&V report include Hines #2 "overnight" cost estimates as well as "overnight" market price estimates for similar combined cycle generation. (West. 501FC 2x1 CC).

**10. Refer to the direct testimony of John Crisp, page 9, lines 14-19. Provide all documents supporting the statement that FPC "will achieve fuel savings in the range of \$40 million per year from the Hines 2 plant."**

FPC will produce the non-privileged documents responsive to this request.

RESPECTFULLY SUBMITTED



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT a true and correct copy of the foregoing has been furnished by Federal Express to Deborah Hart, as counsel for Florida Public Service Commission, and via U. S. Mail to all other interested parties of record as listed below on this 10<sup>th</sup> day of October, 2000.

  
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Attorney

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