

#### 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: January 11, 2002



# FLORIDA POWER CORPORATION'S RESPONSE TO STAFF'S SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA POWER CORPORATION (NOS. 34-47)

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") responds to the Staff of the Florida Public Service Commission's ("Staff") Sixth Request for Production and states as follows:

## **DOCUMENTS REQUESTED**

- 34. Provide the Actual vs. Forecast Variance Analysis through Nov. 2001. (Hewitt)
  FPC will produce documents responsive to this request.
- 35. Provide statistical models by revenue class. (Hewitt)

  FPC will produce documents responsive to this request.
- Provide, in electronic format, 10 years of historical and 5 years forecast data used to calculate revenue class models for:
  - (a) June 2001 Forecast

CAF

CMP .

CTR

ECR LEG

RGO

OTH

(b) Sept. 2001 Forecast (Hewitt)

FPC will produce documents responsive to this request.

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

00433 JAN 118

FPSC-COMMISSION CLERK

37. Provide worksheet (including formulas) and all reference materials used to revise the June 2001 Forecast economic variables for the Sept. 2001 Forecast. (Hewitt)

FPC will produce documents responsive to this request.

38. Provide copy of DRI/WEFA documents used to derive economic assumptions used in June 2001 Forecast economic variables. (Hewitt)

FPC will produce documents responsive to this request.

39. Provide copy of DRI/WEFA documents supporting JBC-5 direct testimony. (Hewitt)

FPC will produce documents responsive to this request.

40. Provide copy of BEBR documents supporting population and customer growth assumptions. (Hewitt)

FPC will produce documents responsive to this request.

41. Provide copy of documents supporting forecasted sales to phosphate customers and coincident peak demands. (Hewitt)

FPC will produce documents responsive to this request.

42. Provide copy of documents supporting number of historical and forecasted customers participating in the Seasonal Service Rate. (Hewitt)

FPC will produce documents responsive to this request.

43. Provide copy of spreadsheets used to disaggregate revenue class forecast into rate class forecast. (Hewitt)

FPC will produce documents responsive to this request.

44. Provide, in electronic format, the analyses used to develop the Company's wholesale sales forecast. This should include:

FPC will produce documents responsive to this request.

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- (a) Identifying total number of wholesale customers;
- (b) Identifying those customers, and their respective loads, that are on full requirements contracts;
- (c) Identifying those customers, and their respective loads, that are on partial requirements contacts;
- (d) Identifying those customers, and their associated loads, that are taking "supplemental" contracts;
- (e) Providing the rates, for each wholesale customer, set for those contracts as used for forecasting purposes;
- (f) Providing the Company's forecasted wholesale market prices;
- (g) Providing the Company's forecast of its cost of providing service to wholesale customers. (Hewitt)
- 45. Please provide copies of the 2001 Operating Report for October and November, 2001. (Revell)

FPC produced documents responsive to this request in response to OPC's 6<sup>th</sup> Set of Requests to Produce and 11<sup>th</sup> Set of Requests to Produce.

46. Please provide copies of all of the source documents used to determine the short term debt interest rates used for the projected year ending December 31, 2002. (Vendetti)

FPC will produce documents responsive to this request. The methodology used to calculate the short term debt interest rate for the year ending December 31, 2002 is explained below.

The following method was used to come up with the 4.92 CP discount rate.

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Four 2002 Eurodollar futures contract prices were observed on June 22. From these prices the forward libor rates were determined. These rates were averaged to determine the average libor rate for 2002. A spread of 30 basis points was added for credit spread over libor for A2/P2 paper.

Eurodollar Futures Contracts			06/22/2001	
	Mar	EDH2	4.09	
	Jun	EDM2	4.455	
	Sep	EDU2	4.805	
	Dec	EDZ2	5.16	
		Average	4.6275	
		Spread	0.30	Estimated Libor Spread for A2/P2 Paper
			4.9275	

# 47. In reference to Schedule F-17, page 4 of 25, please provide copies of all of the source documents used to determine each inflation rate forecast. (Vendetti)

FPC will produce documents responsive to this request.

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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 this 11th day of January, 2002.

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