## **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

ORIGINAL

RECEIVED-FPSC

Submitted for Filing: January 25, 2002

#### FLORIDA POWER CORPORATION'S **RESPONSE TO PUBLIX SUPER MARKETS, INC.'s SECOND SET OF INTERROGATORIES TO FLORIDA POWER CORPORATION**

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") responds to Publix Super Market, Inc.'s

("Publix") Second Set of Interrogatories (Nos. 44-46) subject to the general and specific

objections previously filed and states as follows:

## **INTERROGATORIES**

**44**. Please provide a breakdown of the FPC advertising budget for the MFR Test Year included in Accounts 907 through 913 pursuant to topic (i.e. safety, conservation, public service, etc.) and also Account 930, General Advertising Expense.

Florida Power has not budgeted for the Test year 2002 any advertising dollars in FERC

accounts 907 through 913 for recovery through base rates. A total of \$1.85 million was

budgeted in FERC account 908 for Energy Conservation programs. These dollars have

been excluded from the Company's base rate cost of service.

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Regarding advertising expenses budgeted to FERC account 930, please see responses to:

Citizens' Fourth Set of Interrogatories to FPC, question #85

Citizens' Eight Set of Requests for Production of Documents to FPC, question #115

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# 45. Please provide a detailed listing of the FPC Capital Improvements Program for the next five years.

See response to Citizens' Third Set of Requests for Production of Documents to FPC

Question #51.

46. Please provide itemized staffing reports for 1999, 2000, 2001 and projected for the Test Year showing employee staffing levels for administration, customer accounting, customer service, sales, production, transmission, and distribution, by regional service areas.

See response to Publix First Set of Interrogatories to FPC Question #29.

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 on January 25, 2002.

Mary Anne Helton, Esquire **\*\*** Adrienne Vining, Esquire Bureau Chief, Electric and Gas Division of Legal Services Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 Phone: (850) 413-6096 Fax: (850) 413-6250 Email: mhelton@psc.state.fl.us

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Thomas A. Cloud, Esq. Gray, Harris & Robinson, P.A. 301 East Pine Street, Ste. 1400 P.O. Box 3068 Orlando, FL 32801 Phone: (407) 244-5624 Fax: (407) 244-5690 Attorneys for Publix Super Markets, Inc. Jack Shreve, Esquire Public Counsel John Roger Howe, Esquire Charles J. Beck, Esquire Deputy Public Counsel Office of Public Counsel c/o The Florida Legislature 111 West Madison St., Room 812 Tallahassee, FL 32399-1400 Phone: (850) 488-9330 Fax: (850) 488-4491 Attorneys for the Citizens of the State of Florida

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04:49am

Signature

STATE OF FLORIDA

COUNTY OF SEMINOLE

BEFORE ME, the undersigned authority, duly authorized to administer oaths, personally appeared <u>Mark A. Mars</u> (to me well known) (who has produced \_\_\_\_\_\_\_\_\_ as identification), on behalf of Florida Power Corporation, as its <u>Vice President</u>, <u>Finance</u> and who, after first being duly sworn, deposes and says that he/she executed the above and foregoing. SWORN TO and subscribed before me this <u>Aff</u> day of <u>Janue</u>, 2002.

and the second sec
BONJA S. MCCREARY My Gottma, Exp. 3/5/05 No, CC 883584
My Comm, Exp. 8/6/05
No. CC 883584
Personally Known ( ) Other I.D.

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