

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 28, 2002

**FLORIDA POWER CORPORATION'S SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS TO CITIZENS**

Pursuant to Rule 1.350, Fla. R. Civ. P. and Rule 28-106.206, F.A.C., Florida Power Corporation ("FPC") requests that the Citizens of the State of Florida ("Citizens") produce documents at the Offices of Carlton Fields, P.A., One Progress Plaza, 200 Central Avenue, Suite 2300, St. Petersburg, FL 33701, on or before February 26, or at such other time and place as the parties may agree on prior to this date.

I. DEFINITIONS

For the purposes of this Request, the following terms shall have the following definitions:

A. The words "you," "your" and "yourself" mean Citizens and all other persons acting or purporting to act on behalf of Citizens during the time period referred to hereafter, including all persons offering testimony on Citizens' behalf in this proceeding.

B. The words "person" or "persons" mean all natural persons and entities, including but not limited to: corporations, companies, partnerships, limited partnerships, joint ventures, trusts, estates, associations, public agencies, departments, bureaus or boards.

C. The terms "document" or "documents" mean the original (or, if the original is not available, then a copy) of each copy or draft of all written, printed, typed, recorded or graphic

matter and all photographic matter, however produced or reproduced, now or formerly within your actual or constructive possession, custody or control or of which you or any of your personal representatives have knowledge. "Document" or "documents" shall include, but are not limited to, all records, correspondence, telegrams, computer records, printouts or analyses, memoranda, memoranda of telephone conversations or meetings, reports, studies, filings, notes, charges, lists, analyses, graphs, diagrams, cost or bid estimates, books, expense reports, invoices, receipts, payment vouchers, reports pertaining to conferences or telephone calls, notebooks, diaries, calendars, books of account, ledgers, journals and other financial records and personal records kept or maintained by you, all handbills or written advertisements, bid documents, and all contracts or agreements entered into by you.

D. The terms "identify" or "identity of" shall mean: (1) when used with respect to a person, to state the person's full name, present or last known business and residential addresses, and present or last known employer and position; (2) when used with respect to a document, to describe the document by character (e.g., letter, report, memorandum, etc.), author, date, and to state its present location and custodian; (3) when used with respect to an oral communication, to identify the persons making and receiving the communication, the approximate date and time of the communication, and a summary of its content or substance.

E. The words "relating to" or "pertaining to" shall mean concerning, respecting, referring to, summarizing, digesting, embodying, reflecting, establishing, tending to establish, tending not to establish, evidencing, comprising, connected with, commenting on, responding to, disagreeing with, showing, describing, analyzing, representing, constituting, or including.

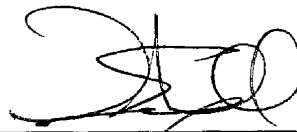
F. The use of the singular shall be deemed to include the plural and use of the masculine shall be deemed to include the feminine as appropriate, and vice versa.

G. Please indicate which documents or groups of documents are produced in response to each particular request.

II. DOCUMENTS TO PRODUCE

10. Please provide all invoices and statements, including all billing detail, agreements, documents identifying hourly rates, or other documents pertaining to expenditures made by the Office of Public Counsel in connection with this Rate Case, including those received from attorneys, consultants, contractors, and any other individuals or businesses regarding expenditures in this case.

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 *), via facsimile transmission and via U.S. Mail to the following this 28 day of January, 2002.

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DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK