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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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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 COMMISSION CLERK

Submitted for Filing: December 18, 2001

FLORIDA POWER CORPORATION'S FIRST 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 January 18, 2002, or at such other time and place as the parties may agree on prior to this date.

The following requests are aimed at discovering information about those proposed experts, consultants and/or witnesses who intend to offer testimony on behalf of Citizens on the date Citizens are required to serve intervenor testimony as established by the Commission in this case on or about January 18, 2002. If the date for filing intervenor testimony is altered

or any reason, Citizens should still be able to respond to this discovery on or before the filing deadline for such testimony.

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I. DEFINITIONS

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

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DOCUMENT NUMBER-DATE

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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

In reference to each witness identified in response to Interrogatory No. 1 of FPC's First Set of Interrogatories to Citizens, please provide:

1. All direct, rebuttal, sir-rebuttal testimony filed by the witness in the last five (5) years relating to the same and/or similar topic on which the witness is filing testimony in this proceeding.
2. All workpapers, spreadsheets, electronic files, or other materials referred to and/or relied upon by the witness in the course of preparing his/her testimony in this proceeding.
3. All databases (in electronic format) used by the witness in the course of preparing his/her testimony in this proceeding.

4. All articles published or submitted for publication by the witness in the last five (5) years on the same topic and/or a topic similar to the one that the witness is filing testimony on in this proceeding.

5. All texts, treatises, textbooks, or other materials referred to and/or relied upon by the witness in the course of preparing his/her testimony in this proceeding.

6. All documents, spreadsheets, data, on disk if available, used by the witness in the development of exhibits to his/her testimony, if any.

7. All source documents used to create the exhibits to the witness' testimony.

8. All orders in your possession, custody or control issued by state regulatory commissions on merger related issues.

9. All documents or other materials reviewed for any purpose, even if not relied on, by the witness in the course of preparing his/her testimony in this proceeding.

Respectfully submitted,



James A. McGee
FLORIDA POWER CORPORATION
Post Office Box 14042
St. Petersburg, FL 33733-4042
Telephone: (727) 820-5184
Facsimile: (727) 820-5519

Gary L. Sasso
James Michael Walls
Jill H. Bowman
W. Douglas Hall
CARLTON FIELDS, P. A.
Post Office Box 2861
St. Petersburg, FL 33731
Telephone: (727) 821-7000
Facsimile: (727) 822-3768
Attorneys for Florida Power Corporation

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 18th day of December, 2001.

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

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
Attorneys for the Citizens of the State of Florida

Daniel E. Frank
Sutherland Asbill & Brennan LLP
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2415
Telephone: (202) 383-0838
Counsel for Walt Disney World Co.

Russell S. Kent, Esq.
Sutherland Asbill & Brennan LLP
2282 Killearn Center Blvd.
Tallahassee, FL 32308-3561
Telephone: (850) 894-0015
Counsel for Walt Disney World Co.

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.

John W. McWhirter, Jr., Esquire
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
400 North Tampa Street, Suite 2450
Tampa, FL 33601-3350
Telephone: (813) 224-0866
Fax: (813) 221-1854
Counsel for Florida Industrial Power Users Group

Joseph A. McGlothlin, Esquire
Vicki Gordon Kaufman, Esquire
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
117 South Gadsden
Tallahassee, FL 32301
Telephone: (850) 222-2525
Fax: (85) 222-5606
Counsel for Florida Industrial Power Users Group
and Reliant Energy Power Generation, Inc.

Michael B. Twomey, Esq.
8903 Crawfordville Road (32305)
P.O. Box 5256
Tallahassee, FL 32314-5256
Phone: (850) 421-9530
Fax: (850) 421-8543
Counsel for Sugarmill Woods Civic
Association, Inc. and Buddy L. Hansen



Attorney