

ORIGINAL

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: March 12, 2002

RECEIVED-FPSC 02 MAR 12 PM 2:10 COMMISSION CLERK

FLORIDA POWER CORPORATION'S RESPONSE TO STAFF'S THIRTEENTH REQUEST FOR PRODUCTION OF DOCUMENTS TO FLORIDA POWER CORPORATION (NO. 71-72)

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") Thirteenth Request for Production (No. 71 - 72), subject to the previously filed general and specific objections and states as follows:

DOCUMENTS REQUESTED

71. Please provide copies of all invoices for this rate case that include costs charged to rate case expense for the period of January 1, 2002, through February 28, 2002, and estimated expenses to complete the case through the hearing process, not including any appeal expenses. (Revell & Moniz)

FPC will produce documents responsive to this request. Also, see FPC's response to OPC production request 151.

72. Please provide all documents used to derive and sustain FPC's current complaint resolution processes regarding the following:

- A. All complaints received directly from FPC consumers
B. All complaints received from the Florida Public Service Commission. (P. Lowery)

AUS
CAF
CMP
COM
CTR
ECR
GCL
OPC
MMS
SEC
OTH

RECEIVED & FILED RRM FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE 02859 MAR 12 2002

FPSC-COMMISSION CLERK

FPC will produce documents responsive to this request. Also, see FPC's response to question 372 of Staff's 17<sup>th</sup> set of interrogatories.

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 12<sup>th</sup> day of March, 2002.

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