

ORIGINAL

**Florida
Power**
CORPORATION

JAMES A. MCGEE
SENIOR COUNSEL

October 1, 1997

**Ms. Blanca S. Bayó, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850**

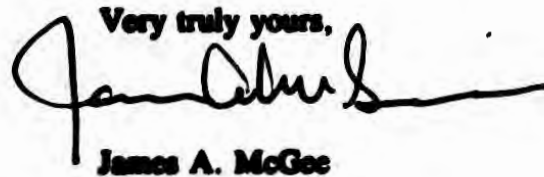
Re: Docket No. 961184-BQ

Dear Ms. Bayó:

Enclosed for filing in the subject docket is an original and one copy of the Notice of Service of Florida Power Corporation's Second Set of Interrogatories to Staff (No. 10).

Please acknowledge your receipt of the above filing on the enclosed copy of this letter and return to the undersigned. Also enclosed is a 3.5 inch diskette containing the above-referenced document in WordPerfect format. Thank you for your assistance in this matter.

- ACK
- AFA _____
- APP _____
- CAF _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
- OPC _____
- RCI _____
- SEI _____
- WAS _____
- OTH _____

Very truly yours,

James A. McGee

**JAM/kp
Enclosures
cc: Parties of Record**

RECEIVED & FILED

FPC RECORDS & REPORTING

DOCUMENT NUMBER-DATE
10114 OCT-25
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Petition for approval of early termination amendment to negotiated qualifying facility contract with Orlando Cogen Limited, Ltd. by Florida Power Corporation

Docket No. 961184-EQ

Submitted for filing:
October 2, 1997

FLORIDA POWER CORPORATION'S SECOND SET OF INTERROGATORIES PROPOUNDED TO STAFF (NO. 10)

Pursuant to Rule 1.340, Florida Rules of Civil Procedure, **FLORIDA POWER CORPORATION ("FPC")**, hereby propounds the following Interrogatories to the Staff of the Florida Public Service Commission ("Staff") which are to be answered separately and fully in writing and under oath by you or your agent within the time frame required by the Florida Rules of Civil Procedure.

Provide the name, department and job title of each person providing answers to the following inquiries and identify which question(s) each person answered.

INSTRUCTIONS

A. These interrogatories are continuing in nature as provided by Rule 1.340 of the Florida Rules of Civil Procedure so as to require you in the circumstances therein specified to file supplementary responses.

DOCUMENT NUMBER-DATE
10114 OCT-25
FPSC-RECORDS/REPORTING

B. If any document(s) otherwise required to be produced by this request are withheld, please identify each document by stating its date, author, recipients and all reasons for withholding the document.

C. If any request is objected to, set forth all reasons for the objections.

D. If you consider any communication or document or information requested herein to be confidential, then you are directed to include in your answers to these Interrogatories a list of communications and documents which have been withheld from discovery or production on that account, identifying each communication by date, time, place, participants, persons present, and subject matter, and each document by type of document, date, addressee, author, title, and give a general description of the subject matter of the document. In addition, you are directed to state with specificity the ground(s) upon each such document is considered confidential and to identify those persons who have seen said documents or received copies thereof.

E. If any request is objected to, set forth all reasons for the objections.

F. As used herein, the term "analysis", "analyses", "recommendation", and "statements" when used in reference to: (a) a document, shall require you to state the number of pages and the nature of the document, (e.g., analysis of inter-generational fairness), its title, its date, the name or names of its authors and recipients, and its present location and custodian; (b) a communication, shall require you, if any part of the communication was written, to identify the document or documents which refer to or evidence the communication and to the

extent that the communication was non-written, to identify the persons participating in the communication and to state the date, manner, place and substance of the communication.

G. To the extent an Interrogatory calls for information which cannot now be precisely and completely furnished, such information as can be furnished should be included in the answer, together with a statement that further information cannot be furnished, and a statement as the reasons therefor. If you expect to obtain further information between the time answers are served and the time of hearing, you are requested to state this fact in each answer. If the information which cannot now be furnished is believed to be available to another person, identify such other person and the reasons for believing such person has the described information.

H. If the answer to any Interrogatory is that you lack knowledge of the requested information, describe all efforts made by you to obtain the information necessary to answer the interrogatory.

DEFINITIONS

Unless specifically indicated, or otherwise required by the context in which the terms, names, and instructions are used, the following definitions shall be applicable herein.

A. "FPC" refers to Florida Power Corporation.

B. "OCL" refers to Orlando Cogea, Inc. and Orlando Power Generation, Inc., as general partners of, and on behalf of Orlando CoGen Limited, L.P.

C. "FPSC" refers to the Florida Public Service Commission.

D. "Staff" refers to the persons at the Florida Public Service Commission to whom these Interrogatories are directed or assigned, all their predecessors, and their past and present departments and Commissions; and all of the parties, agents, servants, employees, and, unless privileged, counsel for that party.

E. "Analysis" and "Analyses" means all written or graphic matter or other means of preserving thought or expression and all tangible things from which information can be processed or transcribed, including the originals and all non-identical copies whether by reason of any notation made on such copy or otherwise, whether produced internally or by received from some other source within the possession, custody of the FPSC or its Staff, including, but not limited to, papers, books, financial, budget or other plans or planning information, feasibility or other studies or evaluations, agreements, computer printouts and other computer materials (including, but not limited to "e-mail" or similar correspondence using computer terminals or other computer generated graphics or stored information), transcripts, proposals, suggestions, legal documents and pleadings, working papers or drafts, statistical records, notebooks, estimates, notations, notes, minutes and notes of department directors or committees,

working or planning groups or other meetings, notices, instructions, work assignments or other articles, correspondence, memoranda, notes, messages, letters, or other communications, chronological data, worksheets, statistics, any and all drafts, alterations and modifications, changes, and amendments of any of the foregoing, graphic or aural records of representations of any kind, including without limitation, charts, graphs, electronic recordings including without limitation, disks, tapes and cassettes, including all attachments and enclosures associated with any of the foregoing.

F. "Conclusion" means constituting, containing, evidencing, embodying, reflecting, identifying, stating, referring to, dealing with, or in any way pertaining to a reasoned judgment or an end reached through logically necessary reasoning or inferred on the basis of evidence.

INTERROGATORIES

10. With reference to Mr. Stallcup's Exhibit PWS-1, please explain the derivation of the individual utility natural gas forecasts for the years 2007 through 2023.

FLORIDA PUBLIC SERVICE COMMISSION

By: _____

Title: _____

STATE OF FLORIDA)
) SS
COUNTY OF LEON)

BEFORE ME, the undersigned authority, personally appeared, _____, who after being first duly sworn, deposes and says that he/she signed the foregoing Interrogatories and that the foregoing Answers are true to the best of his/her knowledge and belief.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 1997, by _____ who is personally known to me, or who has produced _____ as identification.

Name: _____
NOTARY PUBLIC, State of Florida at Large

My Commission Expires:

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**In re: Petition for approval of
early termination amendment to
negotiated qualifying facility
contract with Orlando Cogen
Limited, Ltd. by Florida Power
Corporation**

Docket No.961184-EQ

**Submitted for filing:
October 2, 1997**

**NOTICE OF SERVICE OF FLORIDA POWER
CORPORATION'S SECOND SET OF
INTERROGATORIES PROPOUNDED TO STAFF (NO. 10)**

**NOTICE is hereby given that on October 1, 1997, Florida Power
Corporation served its Second Set of Interrogatories Propounded to Staff (No. 10)
upon the following individuals by U.S. Mail.**

**Roger Yott, P.E.
Thomas Donchez
Air Products & Chemicals, Inc.
2 Windsor Plaza
2 Windsor Drive
Allentown, PA 18195**

**Wm. Cochran Keating IV, Esquire
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Gunter Building, Room 370
Tallahassee, FL 32399-0850**

**Matthew M. Childs, Esquire
Steel, Hector & Davis
215 South Monroe Avenue
First Florida Bank Building
Suite 601
Tallahassee, FL 32301-1804**

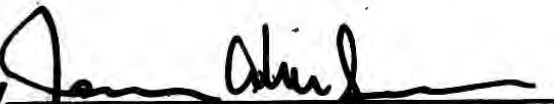
**J. Roger Howe
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, FL 32399-1400**

**Debra Swim, Esquire
Legal Environmental Assistance
Foundation, Inc.
1115 N. Gadsden Street
Tallahassee, FL 32303**

**Orlando Cogen Limited
8275 Exchange Place
Orlando, FL 32809**

Respectfully submitted,

**OFFICE OF THE GENERAL COUNSEL
FLORIDA POWER CORPORATION**

By 

**James A. McGee
Post Office Box 14042
St. Petersburg, FL 33733-4042
Telephone: (813) 866-5184
Facsimile: (813) 866-4931**