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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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IN RE: Fuel and Purchase Power)
Cost Recovery Clause and Generating)
Performance Incentive Factor)

Docket No. 060001-EI

Filed: July __, 2006

COMMISSION
CLERK

PEF'S OBJECTIONS TO OPC'S SIXTH SET OF INTERROGATORIES (NOS. 33-43)

Pursuant to Fla. Admin. Code R. 28-106.206 and Rule 1.340 of the Florida Rules of Civil Procedure, Progress Energy Florida, Inc. ("PEF") hereby serves its objections to the Office of Public Counsel's ("OPC") Sixth Set of Interrogatories to PEF, Nos. 33-43, and states as follows:

GENERAL OBJECTIONS

With respect to the "Definitions" and "Instructions" in OPC's Sixth Set of Interrogatories, PEF objects to any definitions or instructions that are inconsistent with PEF's discovery obligations under applicable rules. If some question arises as to PEF's

CMP _____ discovery obligations, PEF will comply with applicable rules and not with any of OPC's
COM _____ definitions or instructions that are inconsistent with those rules. Furthermore, PEF
CTR _____
ECR _____ objects to any interrogatory that calls for PEF to create data or information that it
GCL _____ otherwise does not have because there is no such requirement under the applicable rules
OPC _____ and law.

RCA _____
SCR _____ PEF objects to OPC's definition "(i)" given that it includes "affiliates" in the
SGA _____ definitions of "PEF" and "Progress Fuels." PEF objects to any definition or interrogatory

SEC 1
OTH _____

DOCUMENT NUMBER-DATE

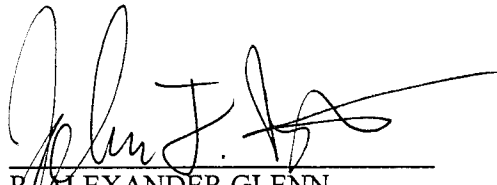
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FPSC-COMMISSION CLERK

that seeks to encompass persons or entities who are not parties to this action or that are not subject to discovery under applicable rules.

Additionally, PEF generally objects to OPC's interrogatories to the extent that they call for data or information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law.

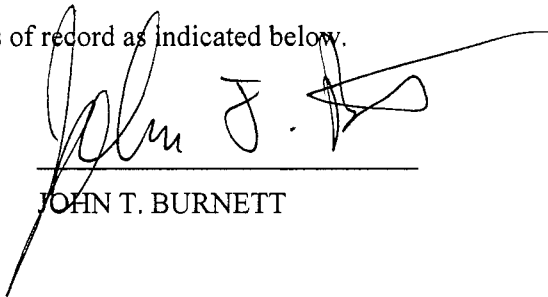
Finally, PEF objects to any attempt by OPC to evade any numerical limitations set on interrogatories by asking multiple independent questions within single individual questions and subparts. By making these general objections at this time, PEF does not waive or relinquish its right to assert additional general and specific objections to OPC's discovery at the time PEF's response is due.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S. Mail this 11th day of July, 2006 to all parties of record as indicated below.



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