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Subject: Docket 060658-EI; PEF Objections to Staff's 3rd Set of Interrogatories (Nos. 61-77)
Attachments: Objections - Staff 3rd Interrogs..pdf

ORIGINAL

This electronic filing is made by:

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Docket: 060658-EI

In re: Petition on behalf of Citizens of the State of Florida to require Progress Energy Florida, Inc. to refund to customers \$143 million

On behalf of Progress Energy Florida

Consisting of 4 pages.

The attached document for filing is Progress Energy Florida's Objections to Staff's Third Set of Interrogatories (Nos. 61-77) (a PDF document) <<Objections - Staff 3rd Interrogs..pdf>>

DOCUMENT NUMBER-DATE

02208 MAR 12 07

3/12/2007

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of Citizens of the
State of Florida to require Progress Energy
Florida, Inc. to refund to customers \$143 million

Docket No. 060658-EI

Submitted for Filing: March 12, 2007

**PEF'S OBJECTIONS TO STAFF'S THIRD SET OF
INTERROGATORIES (Nos. 61-77)**

Pursuant to Fla. Admin. Code R. 28-106.206, Rule 1.340 of the Fla. R. Civ. P., Progress Energy Florida, Inc. ("PEF") hereby serves its objections to the Office of General Counsel's ("Staff's") Third Set of Interrogatories (Nos. 61-77).

GENERAL OBJECTIONS

PEF generally objects to Staff'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.

PEF also objects to any Interrogatory or Request for Production that purports to require PEF or its experts to prepare studies, analyses, or to do work for Staff that has not been done for PEF, presumably at PEF's cost.

Finally, PEF reserves the right to supplement any of its responses to Staff's Interrogatories if PEF cannot locate the answers immediately due to their magnitude and the work required to aggregate them, or if PEF later discovers additional responsive information in the course of this proceeding.

By making these general objections at this time, PEF does not waive or relinquish its right to assert additional general and specific objections to Staff's discovery at the time PEF's response is due.

DOCUMENT NUMBER-DATE

02208 MAR 12 8

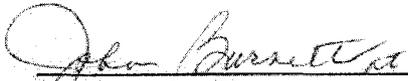
FPSC-COMMISSION CLERK

SPECIFIC OBJECTIONS

Interrogatory 61: PEF objects to this interrogatory to the extent it asks PEF to do work or perform analyses for staff, presumably at PEF's expense, where such work or analyses have not been previously done for PEF.

Interrogatory 75: PEF objects to this interrogatory, because these terms are not defined by Staff in its interrogatories. Subject to and without waiving same, PEF will apply its interpretation of their meaning in answering this question.

Respectfully submitted,

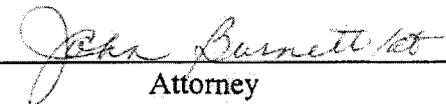


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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Progress Energy Florida, Inc.'s Objections to Staff's Third Set of Interrogatories (61-77), in Docket No. 060658-EI have been furnished by regular U.S. mail to the following this 12th day of March, 2007.



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