

## Ruth Nettles

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**Sent:** Wednesday, April 09, 2008 3:10 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** jbrew@bbrslaw.com; burgess.steve@leg.state.fl.us; john.burnett@pgnmail.com; Katherine Fleming; charles.gauthier@dca.state.fl.us; alex.glenn@pgnmail.com; Mike.Halpin@dep.state.fl.us; MInimushomines@aol.com; paul.lewisjr@pgnmail.com; KSTorain@potashcorp.com; Walls, J. Michael; Triplett, Dianne  
**Subject:** Filing Docket No. 080148  
**Attachments:** PEF Objections to Staff 2nd Request for Production (Nos. 4-15).pdf

Docket 080148; In re: Petition for determination of need for Levy Units 1 and 2 nuclear power plants, by Progress Energy Florida, Inc.

Filing: Progress Energy Florida's Objections to Staff's Second Request for Production of Documents (Nos. 4-15) [3 pages]

On behalf of Progress Energy Florida, Inc.

Person making this filing:

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DOCUMENT NUMBER-DATE

02748 APR-9 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition for determination of need  
for Levy Units 1 and 2 nuclear power plants,  
by Progress Energy Florida, Inc.

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Docket No. 080148-EI

Submitted for Filing: April 9, 2008

**PROGRESS ENERGY FLORIDA'S OBJECTIONS TO  
STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 4-15)**

Pursuant to Fla. Admin. Code R. 28-106.206 and Rule 1.350 of the Florida Rules of Civil Procedure, Progress Energy Florida, Inc. ("PEF") hereby serves its objections to Staff's Second Request for Production of Documents to PEF (Nos. 4-15), as follows:

**GENERAL OBJECTIONS**

PEF objects to any definitions or instructions that are inconsistent with PEF's discovery obligations under applicable rules.

**SPECIFIC OBJECTIONS**

Request 7: PEF objects to this request as overbroad, irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence. Subject to and without waiving this objection or PEF's general objections, PEF will provide portions of responsive documents, if any, that specifically and individually address Levy Units 1 and 2.

Request 9: PEF objects to this request as overbroad, irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence. Subject to and without waiving this objection or PEF's general objections, PEF will provide portions of responsive documents, if any, that specifically and individually address Levy Units 1 and 2.

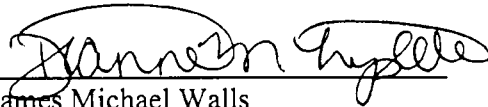
DOCUMENT NUMBER - DATE

02748 APR -9 8

FPSC - COMMISSION CLERK

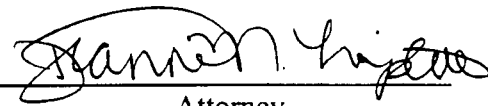
Request 11: PEF objects to this request as overbroad, irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence. Subject to and without waiving this objection or PEF's general objections, PEF will provide portions of responsive documents, if any, that specifically and individually address Levy Units 1 and 2.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished to counsel and parties of record as indicated below via electronic and U.S. Mail this 9<sup>th</sup> day of April, 2008.

  
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