

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination
of Need for Citrus County Combined Cycle
Power Plant, by Duke Energy Florida, Inc.

Docket No. 140110-EU

In re: Petition for Determination
of Cost Effective Generation Alternative
to Meet Need Prior to 2018, by Duke
Energy Florida, Inc.

Docket No. 140111-EI

Submitted: August 4, 2014

**NRG FLORIDA LP'S
OBJECTIONS TO STAFF'S
FIRST SET OF INTERROGATORIES (NOS. 1-3)**

Pursuant to Rule 28-106.206, Florida Administrative Code, Rule 1.340, Florida Rules of Civil Procedure ("F.R.C.P."), and the Orders Establishing Procedure in this docket, NRG Florida LP ("NRG") hereby objects to the above-referenced interrogatories, which were served on NRG by the Staff of the Florida Public Service Commission by email on July 23, 2014.

GENERAL OBJECTIONS

NRG objects to Staff's First Set of Interrogatories as follows:

1. NRG objects to any interrogatory that seeks 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, whether such privilege or protection appears at the time response is first made or is later determined to be applicable.
2. NRG objects to any interrogatory that seeks confidential proprietary business information.

3. NRG objects to any definition or instruction to the extent that it is inconsistent with or beyond the scope of discovery specified in the Florida Rules of Civil Procedure, the Model Rules of Procedure or the Commission ' s rules on discovery.

4. NRG objects to the interrogatories to the extent that they ask NRG to identify "all" documents or information of any nature. It is possible that not every relevant document may have been reviewed or considered in developing NRG's responses to the discovery requests. NRG will provide all information that NRG obtained after a good faith, reasonable and diligent search in response to these interrogatories.

5. NRG objects to each interrogatory to the extent that it seeks information that is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

6. NRG objects to each interrogatory to the extent it is vague, ambiguous, overly broad, burdensome, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such interrogatories. NRG reserves and does not waive any objections it may have to the admissibility, authenticity or relevancy of the information provided in its responses to these interrogatories.

7. NRG objects to providing information already in the public record, that is as easily accessible to Staff, or that is already in Staff's possession.

Respectfully submitted this 4th day of August, 2014.

/s/ Marsha E. Rule

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the following by electronic mail this 4th day of August, 2014:

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