

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Determination)
of Need for Citrus County Combined) DOCKET NO. 140110-EI
Cycle Power Plant, by Duke Energy)
Florida, Inc.)

In re: Petition for Determination)
of Cost Effective Generation) DOCKET NO. 140111-EI
Alternative to Meet Need Prior to)
2018, by Duke Energy Florida, Inc.) SERVED: AUG. 20, 2014

**CALPINE CONSTRUCTION FINANCE COMPANY, L.P.'S
OBJECTIONS TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
TO CALPINE CONSTRUCTION FINANCE COMPANY, L.P. (NOS. 1-2)**

Pursuant to Rule 28-106.206, Florida Administrative Code, Rule 1.340, Florida Rules of Civil Procedure ("F.R.C.P."), and the Order Establishing Procedure (as amended) in this docket, Calpine Construction Finance Company, L.P. ("Calpine") hereby files its objections to Staff's First Request for Production of Documents (Nos. 1-2), which were propounded on Calpine on August 14, 2014.

GENERAL OBJECTIONS

Calpine generally objects to Staff's First Request for Production of Documents on the grounds set forth in paragraphs A-C below. Each of Calpine's specific objections, and each of Calpine's responses, will be subject to and qualified by these general objections.

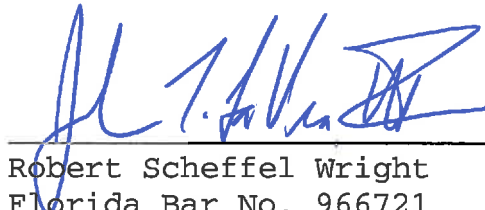
A. Calpine objects to any production request that requests information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time response is first made to these interrogatories or is later determined to be applicable for any reason. Calpine in no way intends to waive any such privilege or protection. Calpine will provide a privilege log consistent with Florida law within a reasonable time or as may be agreed to by the parties to the extent that an interrogatory calls for the production of privileged or protected documents or information.

B. Calpine objects to any production request that requests Calpine to divulge confidential proprietary business information and/or the compilation of information that is considered confidential proprietary business information. Calpine in no way intends to waive any applicable claim of confidentiality and will produce such information only under the terms of an appropriate confidentiality agreement and pursuant to the requirements of Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

C. Calpine objects to any definitions or instructions accompanying the production requests to the extent that they are inconsistent with and expand the scope of discovery specified in

the Florida Rules of Civil Procedure that are incorporated into the Model Rules of Procedure or the Commission's rules on discovery. If some question arises as to Calpine's discovery obligations, Calpine will comply with applicable rules and not with any of the definitions or instructions accompanying the discovery requests that are inconsistent with or exceed the requirements of those rules.

Respectfully submitted this 20th day of August, 2014.



Robert Scheffel Wright
Florida Bar No. 966721
schef@gbwlegal.com
John T. LaVia, III
Florida Bar No. 853666
jlavia@gbwlegal.com
Gardner, Bist, Wiener, Wadsworth,
Bowden, Bush, Dee, LaVia &
Wright, P.A.
1300 Thomaswood Drive
Tallahassee, Florida 32308
(850) 385-0070 Telephone
(850) 385-5416 Facsimile

Attorneys for Calpine Construction
Finance Company, L.P.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the following, by electronic delivery, on this 20th day of August, 2014.

Curt Kiser
Michael Lawson
Florida Public Service Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

John T. Burnett
Dianne M. Triplett
Duke Energy Florida, Inc.
P.O. Box 14042
St. Petersburg, Florida 33733-4042

James Michael Walls
Blaise N. Gamba
Carlton Fields Jordan Burt
P.O. Box 3239
Tampa, Florida 33601-3239

Matthew R. Bernier
Paul Lewis, Jr.
Duke Energy Florida, Inc.
106 East College Avenue, Suite 800
Tallahassee, Florida 32301

J.R. Kelly
Charles Rehwinkel
Erik L. Sayler
Office of the Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399-1400

Jon Moyle, Jr.
Karen Putnal
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, Florida 32301

James W. Brew
Brickfield, Burchette, Ritts
& Stone, P.C.
1025 Thomas Jefferson Street, NW,
Eighth Floor, West Tower
Washington, DC 20007-5201

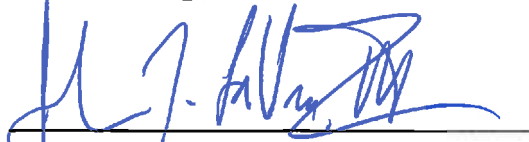
Marsha E. Rule
Rutledge Ecenia, P.A.
119 South Monroe Street
Suite 202
Tallahassee, Florida 32301

Richard A. Zambo
Richard A. Zambo, P.A.
2336 S.E. Ocean Boulevard, #309
Stuart, Florida 34966

Gordon D. Polozola
South Central Region
NRG Energy, Inc.
112 Telly Street
New Roads, Louisiana 70760

Linda Loomis Shelley
Buchanan Ingersoll & Rooney/
Fowler White Boggs PA
101 North Monroe St., Suite 1090
Tallahassee, FL 32301

Alan Seltzer
John Povilaitis
Buchanan Ingersoll & Rooney/
Fowler White Boggs PA
409 N. Second St, Ste. 500
Harrisburg, PA 17101-1357



Attorney