

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**In re: Progress Energy Florida, Inc.'s)
petition for approval of storm cost) Docket No.: 041272
recovery clause for extraordinary)
expenditures related to Hurricanes)
Charley, Frances, Jeanne, and Ivan.) Submitted for Filing: November 29, 2004
)**

**PROGRESS ENERGY FLORIDA INC.'S CLARIFICATIONS REGARDING
STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-10)
AND STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-16)**

Pursuant to Fla. Admin. Code R. 28-106.206, Rules 1.340 and 1.350 of the Florida Rules of Civil Procedure, and the Order Establishing Procedure issued November 18, 2004, Progress Energy Florida, Inc. ("PEF") hereby serves its clarifications to the Staff of the Florida Public Service Commission's ("Staff") First Request for Production (Nos. 1-10) and First Set of Interrogatories (Nos. 1-16) and states as follows:

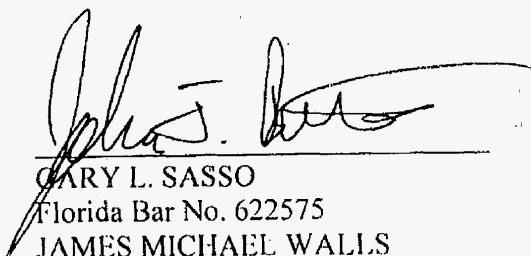
GENERAL CLARIFICATIONS

With respect to the "Time and Place of Production" requirement in Staff's First Request for Production of Documents, PEF will make all responsive documents available for inspection and copying at the offices of Carlton Fields, P.A., 215 S. Monroe Street, Suite 500, Tallahassee, Florida, 32301 at a mutually-convenient time or, upon request from Staff, will provide copies of responsive documents and materials by U.S. Mail, overnight mail, or will produce the documents in some other manner or at some other place that is mutually convenient to both PEF and Staff for purposes of inspection, copying, or handling of the responsive documents.

To the extent that Staff asks PEF to have each interrogatory answer signed by the person providing the answer, there is no such requirement under Rule 1.340 of the Florida Rules of Civil Procedure or the Order Establishing Procedure. PEF will answer the interrogatories in

with the intent of the Order Establishing Procedure to reduce the delay in identifying and resolving any potential discovery disputes.

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Progress Energy Florida

Docket No. 041272-E1

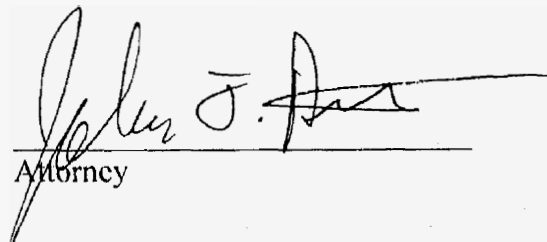
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished to the following individuals by electronic mail and regular U.S. Mail the 29th day of November, 2004.

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