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President



Harold McLean
Public Counsel

STATE OF FLORIDA
OFFICE OF PUBLIC COUNSEL

C/O THE FLORIDA LEGISLATURE
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ALLAN BENSE
Speaker



Patricia A. Christensen
Associate Public Counsel

February 21, 2005

Ms. Blanca S. Bayó, Director
Division of the Commission Clerk
and Administrative Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0870

RE: Docket No. 041414-EI, In Re: Progress Energy Florida, Inc.'s petition for approval of long-term fuel supply and transportation contracts for Hines Unit 4 and additional system supply and transportation.

Dear Ms. Bayó:

Enclosed for filing in the above-referenced docket are the original and fifteen (15) copies of the Office of Public Counsel's Second Request for Production of Documents to Progress Energy Florida, Inc. (No. 2) for filing in the above referenced docket.

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

Sincerely,

A handwritten signature in black ink, appearing to read "Patricia A. Christensen".

Patricia A. Christensen
Public Counsel

PC/pd
Enclosures

DOCUMENT NUMBER-DATE
01777 FEB 21 03
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Progress Energy Florida, Inc.'s
petition for approval of long-term fuel
supply and transportation contracts for
Hines Unit 4 and additional system
supply and transportation.

Docket No. 041414-EI

Filed: February 21, 2005

**NOTICE OF SERVICE OF CITIZENS' SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS (NO. 2) TO PROGRESS ENERGY FLORIDA**

The Office of Public Counsel files notice that it has served its Second Request for Production of Documents to Progress Energy Florida, Inc. by U.S. Mail and electronic mail to: R. Alexander Glenn, Progress Energy Florida, Inc., 100 Central Avenue, Suite 1D, St. Petersburg, FL 33701, and James Michael Walls, Carlton Fields Law Firm, Post Office Box 3239, Tampa, FL 33601-3239, on this 21st day of February 2005.

Harold McLean
Public Counsel



Patricia A. Christensen
Florida Bar No. 0989789
Associate Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
(850) 488-9330

Attorneys for the Citizens
of the State of Florida

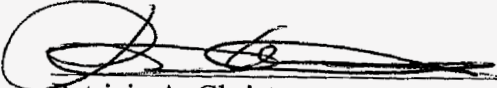
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Service of the Office of Public Counsel's Second Request for Production of Documents (No. 2) to Progress Energy Florida, Inc. has been furnished by electronic mail and U.S. Mail on this 21st day of February, 2005, to the following:

R. Alexander Glenn
Progress Energy Service Company
100 Central Avenue
St. Petersburg, Florida 33701

Adrienne Vining
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

Carlton Fields Law Firm
Gary Sasso/John Burnett/James Michael Walls
P.O. Box 3239
Tampa, FL 33607-5736


Patricia A. Christensen
Associate Public Counsel

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Progress Energy Florida, Inc.'s
petition for approval of long-term fuel
supply and transportation contracts for
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Docket No. 041414-EI

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**CITIZENS' SECOND REQUEST FOR PRODUCTION OF
DOCUMENTS (NO. 2) TO PROGRESS ENERGY FLORIDA**

Pursuant to § 350.0611(1), Fla. Stat. (2002), Fla. Admin. Code R. 28-106.206, and Fla. R. Civ. P.1.350, Florida's Citizens ("Citizens") request Progress Energy Florida ("Progress") to produce the following documents for inspection and copying at the Office of Public Counsel, Claude Pepper Building, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400, on or before March 18, 2005, or at such other time and place as may be mutually agreed upon by counsel.

DEFINITIONS

1. The terms "document" or "documents" are meant to have the broadest possible meaning under applicable law and includes, but is not necessarily limited to, any written, recorded, filmed or graphic matter, whether produced, reproduced, or on paper, e-mail, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, memoranda, notes, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial

statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, and notes, any of which are in your possession, custody, or control.

2. The term "referring or relating to" means any oral, graphic, demonstrative, telephonic, verbal, electronic (including e-mail), written or other conveyance of information, including but not limited to conversations, telecommunications, and documents.

3. The terms "Progress" and "company" encompass Progress Energy Florida, together with the officers, employees, consultants, agents, representatives, attorneys, and any other person or entity acting on behalf of Progress Energy Florida.

4. As used herein the terms "you," "your," and "company" refer to Progress Energy Florida, as defined in the previous paragraph, together with the officers, employees, consultants, agents, representatives, and attorneys of Progress Energy Florida, as well as any other person or entity acting on behalf of Progress Energy Florida.

5. Words in the past tense include the present, and words in the present tense include the past. Use of the singular includes the plural, and use of the masculine includes the feminine where appropriate, and vice versa.

INSTRUCTIONS

1. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

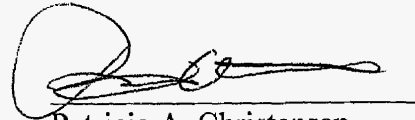
2. These discovery requests are to be answered with reference to all information in your possession, custody or control, or reasonably available to you.

3. If Progress Energy Florida has possession, custody, or control of the originals of the documents requested, please produce the originals or a complete copy of the originals and all copies which are different in any way from the original, whether by interlineation, receipt stamp or notation. If Progress Energy Florida does not have possession, custody, or control of the originals of the documents requested, please produce any copies in the possession, custody, or control, however made, of Progress Energy Florida.

4 Please construe "and" as well as "or" either disjunctively or conjunctively as necessary to bring within the scope of this production of documents any document which might otherwise be construed to be outside the scope.

DOCUMENTS REQUESTED

1. Please provide copies of all responses to Staff's Discovery propounded on Progress Energy Florida, Inc. by Commission Staff to date including Staff's Second Set of Interrogatories (Nos. 52-58) and Staff's Second Request for Production of Documents (Nos. 5-6).



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