

Response: The following table represents natural gas that is currently under contract.

	A	B	C	D	E	F
Source of PEF's Natural Gas by Zone (Bcf)						
	FGT Zone 1	FGT Zone 2	FGT Zone 3	Other (Gulfstream)		
2004	7.2	6.2	9.6	37.7		
2005	7.2	6.2	12.0	43.6		
2006	5.0	4.5	5.2	34.9		

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77. Please describe the extent of the manufacturer's liability when a piece of equipment breaks for a reason identified and traced back to the manufacturer.

Response: PEF must object to this interrogatory because it is overly broad, not reasonably calculated to lead to the discovery of admissible evidence and seeks information that is not relevant to the issues in the proceeding. PEF has multiple generating units, each with innumerable pieces of equipments manufactured by different companies. It is not practicable or even possible to compile the requested information within the required time-frame. Furthermore, such information is not relevant to the issues in the proceeding.

78. For the years 2000 through 2004, please provide the following information in the table below for those unplanned outages caused by equipment failure due to manufacturer's defect:

PEF's 2000-2004 Unplanned Outages due to Manufacturer's Defect(s)				
Unit	Outage Dates	Cause	Replacement MWHs	Replacement Fuel Costs

Response: PEF must object to this interrogatory because it is overly broad, not reasonably calculated to lead to the discovery of admissible evidence and seeks information that is not relevant to the issues in the proceeding. PEF has multiple generating units, each with innumerable pieces of equipments manufactured by different companies. It is not practicable or even possible to compile the requested information within the required time-frame. Furthermore, such information is not relevant to the issues in the proceeding.

79. For the years 2000 through 2004, please provide the following information in the table below for those unplanned outages at Progress Energy Ventures' generating units caused by equipment failure due to manufacturer's defect:

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