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COMMISSION
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition on behalf of Citizens of the
State of Florida to require Progress Energy
Florida, Inc. to refund to customers \$143 million

Docket No. 060658-EI

Submitted for Filing: December 4, 2006

**PEF'S OBJECTIONS TO OPC'S SECOND SET OF
INTERROGATORIES (Nos. 19-20)**

Pursuant to Fla. Admin. Code R. 28-106.206, Rule 1.340 of the Fla. R. Civ. P., Progress Energy Florida, Inc. ("PEF") hereby serves its objections to the Office of Public Counsel's ("OPC's") Second Set of Interrogatories (Nos. 19-20)

GENERAL OBJECTIONS

With respect to the "Definitions" and "Instructions" in OPC's First Set of Interrogatories, PEF objects to any definitions or instructions that are inconsistent with PEF's discovery obligations under applicable rules. If some question arises as to PEF's discovery obligations, PEF will comply with applicable rules and not with any of OPC's definitions or instructions that are inconsistent with those rules. Furthermore, PEF objects to any interrogatory that calls for PEF to create data or information that it otherwise does not have because there is no such requirement under the applicable rules and law.

CMP _____ PEF objects to OPC's definition "(i)" given that it includes "affiliates" in the definitions of "PEF"
COM _____ and "Progress Fuels." PEF objects to any definition or interrogatory that seeks to encompass persons or
CTR _____
ECR _____ entities who are not parties to this action or that are not subject to discovery under applicable rules.

GCL _____ Additionally, PEF generally objects to OPC's interrogatories to the extent that they call for data
OPC _____ or information protected by the attorney-client privilege, the work product doctrine, the accountant-client
RCA _____
SCR _____ privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law.

SGA _____ Finally, PEF reserves the right to supplement any of its responses to OPC's Interrogatories if PEF
SEC 1 cannot locate the answers immediately due to their magnitude and the work required to aggregate them,
OTH _____ or if PEF later discovers additional responsive information in the course of this proceeding.

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M. Bockland
FPSC BUREAU OF RECORDS

STP#627689.1

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By making these general objections at this time, PEF does not waive or relinquish its right to assert additional general and specific objections to OPC's discovery at the time PEF's response is due.

SPECIFIC OBJECTIONS

Interrogatory No. 19: PEF objects to this interrogatory as irrelevant and not likely to lead to the discovery of admissible evidence. Additionally, PEF objects to the information requested from 2003 through 2004 since such information has no relevance to or bearing on this proceeding.

Respectfully submitted,

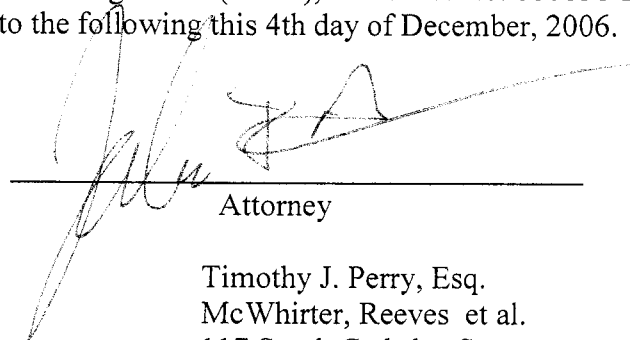
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Progress Energy Florida, Inc.'s Objections to Citizens' Second Set of Interrogatories (19-20), in Docket No. 060658-EI have been furnished by regular U.S. mail to the following this 4th day of December, 2006.



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