

**Ruth Nettles**

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**Sent:** Friday, March 21, 2008 4:52 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** mwalls@carltonfields.com; Lisa Bennett; paul.lewisjr@pgnmail.com; wade\_litchfield@fpl.com; john.burnett@pgnmail.com; BURGESS.STEVE  
**Subject:** Docket No. 080119-EI  
**Attachments:** 080119 - Citizens' 1st Set of INTs 3-21-08 (2).pdf; 080119-EI Citizen's 1st PODs. 3-21-08.pdf

Electronic Filing

a. Person responsible for this electronic filing:

Stephen C. Burgess, Associate Public Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
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- CMP \_\_\_\_\_
- COM \_\_\_\_\_
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- OPC \_\_\_\_\_
- RCA \_\_\_\_\_
- SCR \_\_\_\_\_
- SGA \_\_\_\_\_
- SEC \_\_\_\_\_
- OTH \_\_\_\_\_

b. Docket No. 080119-EI

In re: Nuclear power plant cost recovery clause.

c. Document being filed on behalf of the Office of Public Counsel.

d. There are a total of 20 pages.

e. The documents attached for electronic filing are **Citizens' First Request for Production of Documents to Progress Energy Inc. (Nos. 1-11) and Citizens' First Set of Interrogatories to Progress Energy Florida, Inc. (Nos. 1-21).**

Thank you for your attention and cooperation to this request.

Kimberly D. Kirby  
Assistant to Stephen C. Burgess  
Associate Public Counsel  
Office of Public Counsel  
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DOCUMENT NUMBER - DATE  
02153 MAR 21 08  
FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Nuclear Power Plant Cost Recovery  
Clause.

DOCKET NO. 080119-EI

March 21, 2008

**CITIZENS' FIRST SET OF INTERROGATORIES  
TO PROGRESS ENERGY FLORIDA, INC. (Nos. 1-21)**

Pursuant to § 350.0611(1), Florida Statutes, Rule 28-106.206, Florida Administrative Code and Rule 1.340, Florida Rules of Civil Procedure, the Citizens of the State of Florida ("Citizens") by and through their undersigned attorney with the Office of Public Council ("OPC") hereby propound the following interrogatories to Progress Energy Florida, Inc. ("PEF," "Utility" or "Company"), to be answered on or before 30 days from the date of service, or at such other time and place as may be mutually agreed upon by counsel. Each interrogatory should be answered under oath by the most qualified and informed person to provide the most complete and accurate answer to each question, who is also included within the definition of Progress Energy Florida, Inc.

**DEFINITIONS**

As used herein, the following words shall have the meanings indicated:

- (i) "Progress Energy Florida, Inc." shall mean the company, including but not limited to any of its directors, employees, consultants, agents, representatives, attorneys (concerning nonprivileged matters, which privilege must be expressly identified and justified) and any other person or entity acting or purporting to act on behalf of the Company.

DOCUMENT NUMBER-DATE

02153 MAR 21 08

FPSC-COMMISSION CLERK

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 080119-EI**

I HEREBY CERTIFY that a true and correct copy of the foregoing Citizens' First Set of Interrogatories (Nos. 1-21) to Progress Energy Florida, Inc., has been furnished by E-mail and by U. S. Mail to the following parties this 21<sup>st</sup> day of March, 2008:

J. Michael Walls/Diane M. Tripplett  
Carlton Fields Law Firm  
Post Office Box 3239  
Tampa, Florida 33601-3239

John T. Burnett/R. Alexander Glenn  
Progress Energy Service Company, LLC  
Post Office Box 14042  
St. Petersburg, Florida 33733-4042

R. Wade Litchfield/John Butler/  
Bryan Anderson  
Florida Power & Light Company  
700 Universe Boulevard2540  
Juno Beach, Florida 33408-0420

Lisa Bennett/Keino Young/Jennifer  
Brubaker  
Office of the General Counsel  
Shumard Oak Boulevard  
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Mr. Paul Lewis, Jr.  
Progress Energy Florida, Inc.  
106 East College Avenue, Suite 800  
Tallahassee, Florida 32301-7740

s/Steve Burgess  
Steve Burgess  
Associate Public Counsel