

**Marguerite McLean**

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**Sent:** Tuesday, April 28, 2009 4:49 PM  
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**Subject:** Electronic Filing Docket No. 090079-EI  
**Attachments:** PEF Object to OPC 2nd Interrogatories.pdf



PEF  
OPC 2ND

- \* **Matthew R. Bernier, Carlton Fields, P.A., 215 South Monroe Street, Ste. 500, Tallahassee, FL 32301, mbernier@carltonfields.com is the person responsible for this electronic filing;**
- \* **The filing is to be made in Docket 090079-EI, In re: Petition for rate increase in rates by Progress Energy Florida, Inc.;**
- \* **The total number of pages is 16;**
- \* **The attached document is Progress Energy Florida, Inc.'s Objections to OPC's Second Set of Interrogatories (Nos. 53-108).**

Thank you.

**BARBARA O'NEAL**  
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DOCUMENT NUMBER-DATE

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Petition for Increase in Rates  
by Progress Energy Florida, Inc.

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Docket No. 090079-EI  
Submitted for filing: April, 28, 2009

**PEF'S OBJECTIONS TO OPC'S SECOND SET OF  
INTERROGATORIES (NOS. 53-108)**

Pursuant to Fla. Admin. Code R. 28-106.206, Rule 1.350 of the Florida Rules of Civil Procedure, and the Order Establishing Procedure in this matter, Progress Energy Florida, Inc. ("PEF") hereby serves its objections to Office of Public Counsel's ("OPC") Second Set of Interrogatories (Nos.53-108) and states as follows:

**GENERAL OBJECTIONS**

PEF will make all responsive documents available for inspection and copying at the offices of PEF, 106 E. College Ave., Suite 800, Tallahassee, Florida, 32301 at a mutually-convenient time, or will produce the documents in some other manner or at some other place that is mutually convenient to both PEF and OPC for purposes of inspection, copying, or handling of the responsive documents.

With respect to any "Definitions" and "Instructions" in OPC's 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 OPC's definitions or instructions that are inconsistent with those rules. PEF also objects to any request that calls for documents to be produced from the files of PEF's outside or in-house counsel in this matter because such documents are privileged and are otherwise not within the scope of discovery under the applicable rules and

law. Furthermore, PEF objects to any definition or request that seeks to encompass persons or entities other than PEF who are not parties to this action and thus are not subject to discovery. No responses to the interrogatories will be made on behalf of persons or entities other than PEF. PEF also objects to OPC's request that PEF provide documents in a specific electronic format. Furthermore, PEF objects to any request that calls for PEF to create documents that it otherwise does not have because there is no such requirement under the applicable rules and law.

Additionally, PEF generally objects to OPC's interrogatories to the extent that they call for documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law. PEF will provide a privilege log in accordance with the applicable law or as may be agreed to by the parties to the extent, if at all, that any document request calls for the production of privileged or protected documents.

Further, in certain circumstances, PEF may determine upon investigation and analysis that documents responsive to certain requests to which objections are not otherwise asserted are confidential and proprietary and should be produced only under an appropriate confidentiality agreement and protective order, if at all. By agreeing to provide such information in response to such a request, PEF is not waiving its right to insist upon appropriate protection of confidentiality by means of a confidentiality agreement, protective order, or the procedures otherwise provided by law or in the Order Establishing Procedure. PEF hereby asserts its right to require such protection of any and all information that may qualify for protection under the Florida Rules of Civil Procedure, the Order Establishing Procedure, and all other applicable statutes, rules and legal principles.

PEF generally objects to OPC's Interrogatories to the extent that they call for the production of "all" documents of any nature, including, every copy of every document responsive to the requests. PEF will make a good faith, reasonably diligent attempt to identify and obtain responsive documents when no objection has been asserted to the production of such documents, but it is not practicable or even possible to identify, obtain, and produce "all" documents. In addition, PEF reserves the right to supplement any of its responses if PEF cannot produce requested documents immediately due to their magnitude and the work required to aggregate them, or if PEF later discovers additional responsive documents in the course of this proceeding.

PEF also objects to any request that calls for projected data or information beyond the year 2010 because such data or information is wholly irrelevant to this case and has no bearing on this proceeding, nor is such data or information likely to lead to the discovery of admissible evidence. Furthermore, if a request does not specify a timeframe for which data or information is sought, PEF will interpret such request as calling only for data and information relevant to the years 2006-2010.

Finally, PEF objects to any attempt to evade the numerical limitations set on interrogatories in the Order Establishing Procedure by asking multiple questions within single individual questions and subparts.

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 under the Florida Rules of Civil Procedure and the Order Establishing Procedure. PEF provides these general objections at this time to comply with the intent of the Order Establishing Procedure to reduce the delay in identifying and resolving any potential discovery

disputes.

### **SPECIFIC OBJECTIONS**

**Request 53:** PEF objects to OPC's interrogatory number 53 to the extent that it seeks various information "for the past 10 years," specifically interrogatory 53(c), (d), (e), (h), (i), (k) and (l), because that information is wholly irrelevant to these proceedings. PEF must further object to interrogatory 53(i) because it calls for a "detailed narrative" and the rules require an answer not a "narrative" and not some subjective characterization of the answer. PEF also objects to interrogatory 53(j) because it seeks information pertaining to "anticipated significant or major capital improvements during the next 10 years" because information projected out beyond 2010 is irrelevant to these proceedings and is not reasonably calculated to lead to the discovery of admissible evidence. PEF objects to any request that seeks information for any time period other than 2006-2010 as irrelevant to these proceedings. PEF will respond to this request with the requested information from 2006-2010.

**Request 54:** PEF objects to OPC's interrogatory number 54 because it is seeking information that is irrelevant to these proceedings and is not calculated to lead to the discovery of admissible evidence. To the extent that the information sought could be considered relevant to these proceedings, PEF objects to the request because it seeks information "during the past 10 years" because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, PEF does not maintain or track information in the specific manner that OPC has requested, therefore, an extensive effort is required to collect, assimilate, and analyze data to create the information that OPC requests. PEF is not required by the rules or Order to perform studies in order to respond to a discovery request.

**Request 55:** PEF objects to OPC's interrogatory number 55 to the extent that it seeks information "for the past 10 years" because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible evidence. PEF further objects to the request to the extent that it seeks to have the requested information produced in multiple formats, including specific electronic formats. PEF will provide any responsive information, for the relevant period 2006-2010, in the format in which it is currently maintained.

**Request 59:** PEF objects to OPC's interrogatory number 59 to the extent that it is duplicative of Interrogatory 58.

**Request 62:** PEF objects to OPC's interrogatory number 62 because it seeks to have the requested information produced in multiple formats, including specific electronic formats. PEF will provide any responsive information in the format in which it is currently maintained.

**Request 63:** PEF objects to interrogatory 63(d) and (f) because it calls for a "detailed" "explanation" or "narrative" and the rules require an answer not a "narrative" and not some subjective characterization of the answer. PEF also objects to interrogatory 63 to the extent that it requires PEF to collect, assimilate, and analyze data to create the information that OPC requests. PEF is not required by the rules or Order to perform studies in order to respond to a discovery request. PEF further objects to OPC's interrogatory number 63 because it seeks to have the requested information produced in multiple formats, including specific electronic formats. PEF will provide any responsive information in the format in which it is currently maintained.

**Request 64:** PEF objects to OPC's interrogatory number 64 to the extent that it calls for a "detailed" or "specific" "explanation" or "narrative" because the rules require an answer

not a “narrative” and not some subjective characterization of the answer. PEF will answer the interrogatory in accordance with the applicable discovery rules.

**Request 65:** PEF objects to OPC’s interrogatory number 65 because it seeks to have the requested information produced in multiple formats, including specific electronic formats. PEF will provide any responsive information in the format in which it is currently maintained. PEF must further object to interrogatory number 65 to the extent that it requires PEF to perform studies for OPC that have not been prepared or done by PEF, presumably at PEF’s cost, to provide the information requested. PEF does not maintain or track information in the specific manner that OPC has requested, therefore, an extensive effort is required to collect, assimilate, and analyze data to create the information OPC has requested. PEF is not required by the rules or Order to perform studies in order to respond to a discovery request.

**Request 67:** PEF objects to OPC’s interrogatory number 67 to the extent that it seeks information “for the past 10 years” because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible evidence. PEF further objects to interrogatory number 67 to the extent that it requires PEF to perform studies for OPC that have not been prepared or done by PEF, presumably at PEF’s cost, to provide the information requested. PEF is not required by the rules or Order to perform studies in order to respond to a discovery request.

**Request 68:** PEF objects to OPC’s interrogatory number 68 to the extent that it seeks information “for the past 10 years” because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible evidence. PEF further objects to interrogatory number 68 to the extent that it requires PEF to perform studies for OPC that have not been prepared or done by PEF, presumably at PEF’s cost, to provide the information



requested. PEF is not required by the rules or Order to perform studies in order to respond to a discovery request.

**Request 69:** PEF objects to OPC's interrogatory number 69 to the extent that it seeks information "for the past 10 years" because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible evidence.

**Request 70:** PEF objects to OPC's interrogatory number 70 to the extent that it seeks information "for the past 10 years" because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible evidence. PEF further objects to OPC's interrogatory number 70 because it seeks to have the requested information produced in multiple formats, including specific electronic formats. PEF will provide any responsive information in the format in which it is currently maintained.

**Request 71:** PEF objects to OPC's interrogatory number 71 to the extent that it seeks information "for the past 10 years" because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible evidence. PEF further objects to OPC's interrogatory number 71 because it seeks to have the requested information produced in multiple formats, including specific electronic formats. PEF also objects to interrogatory 71 to the extent that it requires PEF to perform studies for OPC that has not been prepared or done by PEF, presumably at PEF's cost, to provide the information requested. PEF is not required by the rules or Order to perform studies in order to respond to a discovery request. PEF will provide any responsive information that exists in the format in which it is currently maintained.

**Request 72:** PEF objects to OPC's interrogatory number 72 to the extent that it seeks information "for the past 10 years" because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible evidence.

**Request 73:** PEF objects to OPC's interrogatory number 73 to the extent that it seeks information "for the past 10 years" because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible evidence. PEF also objects to interrogatory 73 to the extent that it requires PEF to perform studies for OPC that have not been prepared or done by PEF, presumably at PEF's cost, to provide the information requested. PEF does not maintain or track information in the specific manner that OPC has requested, therefore, an extensive effort is required to collect, assimilate, and analyze data to create the information OPC has requested. PEF is not required by the rules or Order to perform studies in order to respond to a discovery request.

**Request 77:** PEF objects to OPC's interrogatory number 77 to the extent that it seeks information "for the past 10 years" because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible evidence. PEF further objects to interrogatory number 77 to the extent that it requires PEF to perform studies for OPC that have not been prepared or done by PEF, presumably at PEF's cost, to provide the information requested. PEF is not required by the rules or Order to perform studies in order to respond to a discovery request.

**Request 78:** PEF objects to OPC's interrogatory number 78 because it seeks to have the requested information produced in multiple formats, including specific electronic formats. PEF will provide any responsive information in the format in which it is currently maintained.

**Request 79:** PEF objects to OPC's interrogatory number 79 to the extent that it seeks information "for the past 10 years" because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible evidence. PEF further objects to the request to the extent that it seeks to have the requested information produced in multiple

formats, including specific electronic formats. PEF will provide any responsive information, for the relevant period 2006-2010, in the format in which it is currently maintained.

**Request 83:** PEF objects to OPC's interrogatory number 83 because it seeks information that is irrelevant to these proceedings and not reasonably calculated to lead to the discovery of admissible evidence. PEF further objects to the interrogatory to the extent that it requires PEF to perform legal research for OPC. PEF is not required by the rules or Order to perform legal research in order to respond to a discovery request. Finally, PEF objects to interrogatory number 83 to the extent that it seeks information protected by the attorney/client privilege, the work product doctrine, or both.

**Request 84:** PEF further objects to interrogatory number 83 because it because it calls for a "detailed" "narrative" and the rules require an answer not a "narrative" and not some subjective characterization of the answer. Further PEF objects to this interrogatory because it seeks a description of "the practice or procedure that was in effect before the change" and PEF does not know what OPC means by "the change" since it is not defined in the interrogatory. Therefore, this part of the interrogatory is too vague and ambiguous to answer.

**Request 87:** PEF objects to OPC's interrogatory number 87 because it calls for a "detailed" "narrative" and the rules require an answer not a "narrative" and not some subjective characterization of the answer. PEF will provide an answer in accordance with the applicable discovery rules.

**Request 90:** PEF objects to OPC's interrogatory number 90 to the extent that it seeks information "for the past 10 years" because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible evidence.

**Request 91:** PEF objects to OPC's interrogatory number 91 to the extent that it seeks information that is irrelevant to these proceedings and not reasonably calculated to lead to the discovery of admissible evidence. Specifically, 91(d) and (e) seek information related to the types of preservatives applied to wood poles and the time frames of each preservatives used, and 91(f) seeks the dollar investment in wood poles segregated by type of preservative used. PEF must further object to 91(f) to the extent that it requires PEF to perform studies and do work for OPC that have not been prepared or done by PEF, presumably at PEF's cost, to provide the information requested. PEF does not maintain or track information in the specific manner that OPC has requested, therefore, an extensive effort is required to collect, assimilate, and analyze data to create the information OPC has requested. PEF is not required by the rules or Order to perform studies in order to respond to a discovery request. Finally, PEF objects to 91(g) to the extent that it seeks information "for the past 10 years" because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible evidence. Further to the extent it is directed at information from work orders more than five years old, the information cannot be provided as it is no longer in PEF's possession. As stated in 18 CFR section 125.3, the retention policy for work order sheets that are necessary to respond to interrogatory 92(e) is five years after clearance to plant account, provided continuing plant inventory records are maintained. Otherwise the policy is to retain the records for five years after the plant is retired

**Request 92:** PEF objects to OPC's interrogatory number 92 to the extent that it seeks information "for the past 10 years" (i.e., 92(b), (d) and (e)) because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible evidence. Further to the extent it is directed at information from work orders more than five years old, the

information cannot be provided as it is no longer in PEF's possession. As stated in 18 CFR section 125.3, the retention policy for work order sheets that are necessary to respond to interrogatory 92(e) is five years after clearance to plant account, provided continuing plant inventory records are maintained. Otherwise the policy is to retain the records for five years after the plant is retired. PEF must further object interrogatory 92 to the extent that it requires PEF to perform studies for OPC that have not been prepared or done by PEF, presumably at PEF's cost, to provide the information requested. PEF is not required by the rules or Order to perform studies in order to respond to a discovery request.

**Request 93:** PEF objects to OPC's interrogatory number 93 to the extent that it seeks information "for the past 10 years" (i.e., 93(c), (d), (e) and (f)) because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible evidence. PEF further objects to 93(c) and (d) because they seek to have the requested information produced in multiple formats, including specific electronic formats. PEF will provide any responsive information in the format in which it is currently maintained. PEF must further object to interrogatory 93 to the extent that it requires PEF to perform studies for OPC that have not been prepared or done by PEF, presumably at PEF's cost, to provide the information requested. PEF is not required by the rules or Order to perform studies in order to respond to a discovery request.

**Request 94:** PEF objects to OPC's interrogatory number 94 to the extent that it seeks information "for the past 10 years" (i.e., 94(c) and (d)) because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible. Further to the extent it is directed at information from work orders more than five years old, the information cannot be provided as it is no longer in PEF's possession. As stated in 18 CFR section 125.3, the

retention policy for work order sheets that are necessary to respond to interrogatory 92(e) is five years after clearance to plant account, provided continuing plant inventory records are maintained. Otherwise the policy is to retain the records for five years after the plant is retired. PEF must also object to interrogatory 94 to the extent that it requires PEF to perform studies for OPC that have not been prepared or done by PEF, presumably at PEF's cost, to provide the information requested. PEF is not required by the rules or Order to perform studies in order to respond to a discovery request.

**Request 95:** PEF objects to OPC's interrogatory number 95 to the extent that it seeks information "for the past 10 years" (i.e., 95(b), (e) and (g)) because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible. Further to the extent it is directed at information from work orders more than five years old, the information cannot be provided as it is no longer in PEF's possession. As stated in 18 CFR section 125.3, the retention policy for work order sheets that are necessary to respond to interrogatory 92(e) is five years after clearance to plant account, provided continuing plant inventory records are maintained. Otherwise the policy is to retain the records for five years after the plant is retired. PEF must further object to interrogatory 95 to the extent that it requires PEF to perform studies for OPC that have not been prepared or done by PEF, presumably at PEF's cost, to provide the information requested. PEF is not required by the rules or Order to perform studies in order to respond to a discovery request.

**Request 96:** PEF objects to OPC's interrogatory number 95 to the extent that it seeks information "for the past 10 years" (i.e., 96(b)) because information predating 2006 is irrelevant to these proceedings and is not reasonably calculated to lead to admissible. PEF must further object to interrogatory 96 to the extent that it requires PEF to perform studies for OPC that have

not been prepared or done by PEF, presumably at PEF's cost, to provide the information requested. PEF is not required by the rules or Order to perform studies in order to respond to a discovery request.

**Request 97:** PEF objects to OPC's interrogatory number 97 because it seeks to have the requested information produced in multiple formats, including specific electronic formats. PEF will provide any responsive information in the format in which it is currently maintained.

**Request 98:** PEF objects to OPC's interrogatory number 98 because it seeks to have the requested information produced in multiple formats, including specific electronic formats. PEF will provide any responsive information in the format in which it is currently maintained.

**Request 99:** PEF objects to OPC's interrogatory number 99 because it is vague, ambiguous, and seeks irrelevant information that is not reasonably calculated to lead to the discovery of admissible evidence. Specifically, interrogatory 99(a) seeks a list of reasons for retirement by plant account in order of "most significant to least significant." PEF will assume that OPC seeks information related to what has been retired and why it was retired by plant account and will provide that information, but will not characterize its reasoning or responses as the "most" or "least" significant or provide any other qualification, nor will PEF necessarily agree with OPC's classifications of any such responses. Interrogatory 99(b) and (d) are likewise vague and confusing, and appear to request PEF to provide information as to how future actions have effected past decisions. As PEF is not aware of what OPC is seeking to be provided in response to such interrogatories, it must object.

**Request 103:** PEF objects to OPC's interrogatory number 103 because it calls for a "detailed" "narrative" and the rules require an answer not a "narrative" and not some subjective

characterization of the answer. PEF will provide an answer in accordance with the applicable discovery rules.

**Request 104:** PEF objects to OPC's interrogatory number 104 because it seeks to have the requested information produced in multiple formats, including specific electronic formats. PEF will provide any responsive information in the format in which it is currently maintained.

**Request 105:** PEF objects to OPC's interrogatory number 105 to the extent that it seeks to require PEF to provide "all" Commission orders authorizing specific amortizations. Neither the rules nor the Order require PEF to provide OPC with legal research, and this interrogatory seeks to require PEF to do work for OPC that may or may not have been done, presumably at PEF's cost.

**Request 106:** PEF objects to OPC's interrogatory number 106 because it improperly seeks to have PEF or its experts prepare a study or do work for OPC that has not been done for PEF, presumably at PEF's cost, and further, the information requested is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

**Request 107:** PEF objects to OPC's interrogatory number 107 because it improperly seeks to have PEF or its experts prepare a study or do work for OPC that has not been done for PEF, presumably at PEF's cost, and further, the information requested is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

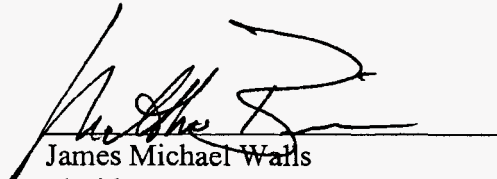
**Request 108:** PEF objects to OPC's interrogatory number 108 because it improperly seeks to have PEF or its experts prepare a study or do work for OPC that has not been done for PEF, presumably at PEF's cost, and further, the information requested is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. PEF further objects to interrogatory number 108 because it seeks to have the requested information produced in



multiple formats, including specific electronic formats. PEF will provide any responsive, relevant information in the format in which it is currently maintained.

Respectfully submitted this 26<sup>th</sup> day of April, 2009.

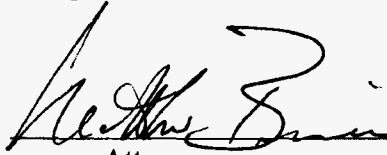
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished electronically and via U.S. Mail this 28<sup>th</sup> day of April, 2009 to all counsel of record as indicated below.

  
\_\_\_\_\_  
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