

Diamond Williams

From: George Cavros [george@cavros-law.com]
Sent: Friday, October 08, 2010 4:01 PM
To: Filings@psc.state.fl.us
Subject: SACE's 2nd Set of Interrogatories (Nos. 2-6) to PEF - Docket No. 100160
Attachments: SACE-2nd rog to PEF-Docket No. 100160.pdf

Dear Commission Clerk,

In accordance with the electronic filing procedures of the Florida Public Service Commission, the following filing is made:

A.

George Cavros, Esq.
120 E. Oakland Park Blvd, Ste. 105
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Telephone: 954.563.0074
Facsimile: 866.924.2824
Email: george@cavros-law.com

B. This filing is made in Docket No. 100160-EG - Petition for Approval of Demand-side Management Plan of Progress Energy Florida, Inc.

C. This document is filed on behalf of Southern Alliance for Clean Energy (SACE).

D. The document is 6 total pages.

E. The attached document is SACE's Second Set of Interrogatories (Nos. 2- 6) to Progress Energy Florida, Inc.

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** Interrogatories detached
and forwarded to RAD.
- DM*

10/8/2010

DOCUMENT NUMBER-DATE

08433 OCT-8 2

FPSC-COMMISSION CLERK

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition for Approval of Demand-side Management Plan of Progress Energy Florida, Inc.

DOCKET NO. 100160-EG

Dated October 8, 2010

**SACE'S SECOND SET OF INTERROGATORIES TO
PROGRESS ENERGY FLORIDA (NOS. 2 - 6)**

Southern Alliance for Clean Energy (SACE), pursuant to Rule 28-106.206, Florida Administrative Code (FAC), and Rule 1.340, Florida Rules of Civil Procedure, propounds the following interrogatories on Progress Energy Florida, Inc. (PEF). These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served as provided by the Rules of Civil Procedure, and within 30 days of the date of service. Each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it. Give the name, address and relationship to PEF of those persons providing the answers to each of the following interrogatories.

DEFINITIONS

Unless otherwise specified in each individual interrogatory, "Company," "you," "your" or "Participants" refers collectively to PEF, their employees and authorized agents.

"Document" refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software.

"Identify" means:

- (a) With respect to a person, to state the person's name, address and business relationship (e.g., "employee") to the Participants;
- (b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

DOCUMENT NUMBER-DATE
08433 OCT-8 2010
FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail and US Mail on this 8th day of October 2010, to the following:

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s/ George Cavros

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