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Subject: Electronic Filing - Docket No. 110009-EI
Attachments: SACE's Responses to PEF's 1st Discovery.pdf

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

- a. The name, address, telephone number and email for the person responsible for the filing is:

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- b. This filing is made in Docket No. 11009-EI.
 c. The document is filed on behalf of SACE.
 d. The total Pages in the document are 12 pages.
 e. The attached document is SACE's Objections and Responses to PEF's First Discovery.

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DOCUMENT NUMBER-DATE

04741 JUL 11 =

FPSC-COMMISSION CLERK

7/11/2011

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost
Recovery Clause

Docket No. 110009-EI

Served: July 11, 2011

**SOUTHERN ALLIANCE FOR CLEAN ENERGY'S OBJECTIONS AND RESPONSES
TO PROGRESS ENERGY FLORIDA, INC.'S FIRST SET OF INTERROGATORIES**
(Nos. 1a-g)

The Southern Alliance for Clean Energy ("SACE"), by and through its undersigned counsel, pursuant to the Florida Rules of Civil Procedure, Rule 28-106.206, F.A.C., and the Order Establishing Procedure in this docket, hereby serves its objections and responses to Progress Energy Florida, Inc.'s ("PEF") First Set of Interrogatories (Nos. 1a-g).

GENERAL OBJECTIONS

1. SACE object to the "Definitions and Instructions" contained in PEF's First Set of Interrogatories to the extent that such "Definitions and Instructions" contradict, expand, or are otherwise inconsistent with the requirements of the Florida Rules of Civil Procedure or any other applicable rules.
2. SACE objects to PEF's First Set of Interrogatories to the extent they seek information that is protected by the attorney-client privilege, the work product doctrine, or any other privilege and immunity from discovery.
3. SACE reserves the right to supplement any of its responses to PEF's 1st Set of Interrogatories if SACE cannot locate the answers immediately due to their magnitude and the work required to aggregate them, or if SACE later discovers additional responsive information

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during the course of this proceeding and such information is required to be supplemented by the Florida Rules of Civil Procedure.

The foregoing General Objections are incorporated by reference into each of the following response set forth below, regardless of whether or not additional objections are set forth. Subject to and without waiving said General Objections, SACE responds as follows:

INTERROGATORIES

1. With respect to any and all person(s) you intend or expect to call as an expert witness at the trial of this cause, please state the following:

(a) Identify each such witness and his or her employer or the organization he or she is associated with in any professional capacity;

RESPONSE: SACE has not identified nor retained, nor does it intend to call, any expert witness during the trial of this matter.

(b) Identify the field in which each such witness is to be offered as an expert;

RESPONSE: Not applicable.

(c) Provide a summary of each such witness' qualifications within the field in which he or she is expected to testify;

RESPONSE: Not applicable.

(d) Provide the substance of the facts and opinions to which each such witness is expected to testify;

RESPONSE: Not applicable.

(e) Provide a summary of the grounds for each opinion for each such witness; and

RESPONSE: Not applicable.

(f) Identify all reports rendered by any such witness which summarize his or her opinions and conclusions, and which will be relied upon or offered into evidence in connection with his or her testimony.

RESPONSE: Not applicable.

(g) Identify the scope of employment of each such witness in this matter and the compensation for such services.

RESPONSE: Not applicable.

This the 11th day of July, 2011.

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CERTIFICATE OF SERVICE
Docket No. 110009-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing **SACE'S OBJECTIONS AND RESPONSES TO PEF'S FIRST SET OF INTERROGATORIES** has been furnished by electronic mail (e-mail) and/or U.S. Mail this the 11th day of July, 2011.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Power Plant Cost
Recovery Clause

Docket No. 110009-EI

Served: July 11, 2011

**SOUTHERN ALLIANCE FOR CLEAN ENERGY'S OBJECTIONS AND RESPONSES
TO PROGRESS ENERGY FLORIDA, INC.'S FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS (NOS. 1-9)**

The Southern Alliance for Clean Energy ("SACE"), by and through its undersigned counsel, pursuant to the Florida Rules of Civil Procedure, Rule 28-106.206, F.A.C., and the Order Establishing Procedure in this docket, hereby serves its objections and responses to Progress Energy Florida, Inc.'s ("PEF") First Request for Production of Documents (Nos. 1-9).

GENERAL OBJECTIONS

1. SACE object to the "Definitions and Instructions" contained in PEF's First Request for Production of Documents to the extent that such "Definitions and Instructions" contradict, expand, or are otherwise inconsistent with the requirements of the Florida Rules of Civil Procedure or any other applicable rules.

2. SACE objects to PEF's First Request for Production of Documents to the extent they seek information that is protected by the attorney-client privilege, the work product doctrine, or any other privilege and immunity from discovery.

3. SACE reserves the right to supplement any of its responses to PEF's 1st Request for Production of Documents if SACE cannot locate all responsive documents immediately due to their magnitude and the work required to aggregate them, or if SACE later discovers

additional responsive information during the course of this proceeding and such information is required to be supplemented by the Florida Rules of Civil Procedure.

The foregoing General Objections are incorporated by reference into each of the following response set forth below, regardless of whether or not additional objections are set forth. Subject to and without waiving said General Objections, SACE responds as follows:

RESPONSES TO REQUEST TO PRODUCE DOCUMENTS

In reference to each witness identified in response to Interrogatory No. 1 of PEF'S First Set of Interrogatories to SACE, served simultaneously with this request, please provide:

1. The witness's most current curriculum vitae.

RESPONSE: Not applicable.

2. All direct, rebuttal, and surrebuttal testimony filed by the witness in the last five (5) years relating to the same and/or similar topic on which the witness is filing testimony in this proceeding.

RESPONSE: Not applicable.

3. All work papers, spreadsheets, electronic files, or other materials referred to and/or relied upon by the witness in the course of preparing his/her testimony in this proceeding, or that the witness will rely on in the course of preparing his/her testimony in this proceeding.

RESPONSE: Not applicable.

4. All articles published or submitted for publication by the witness in the last five (5) years on the same topic and/or a topic similar to the one that the witness is filing testimony on in this proceeding.

RESPONSE: Not applicable.

5. All texts, treatises, textbooks, or other materials referred to and/or relied upon by the witness in the course of preparing his/her testimony in this proceeding, or that the witness will rely on in the course of preparing his/her testimony in this proceeding.

RESPONSE: Not applicable.

6. All documents, spreadsheets, data, on disk if available, used by the witness in the development of exhibits to his/her testimony, if any, or that the witness will rely on in the course of preparing exhibits to his/her testimony in this proceeding.

RESPONSE: Not applicable.

7. All source documents used to create the exhibits to the witness' testimony, or that the witness will rely on in the course of preparing the exhibits to his/her testimony in this proceeding.

RESPONSE: Not applicable.

8. All reports or documents identified in response to PEF's First Set of Interrogatories to SACE.

RESPONSE: Not applicable.

9. All documents or other materials reviewed for any purpose, even if not relied on, by the witness in the course of preparing his/her testimony in this proceeding, or that the witness intends to review in the course of preparing his/her testimony in this proceeding.

RESPONSE: Not applicable.

This the 11th day of July, 2011.

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CERTIFICATE OF SERVICE
Docket No. 110009-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing SACE'S **OBJECTIONS AND RESPONSES TO PEF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS** has been furnished by electronic mail (e-mail) and/or U.S. Mail this the 11th day of July, 2011.

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