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Cc: Schef Wright
Subject: Electronic Filing - Docket No. 120001-EI
Attachments: 120001.FRF.Obj2Staff1stINT.4-20-12.pdf

a. Person responsible for this electronic filing:

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b. 120001-EI

In Re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor.

c. Document being filed on behalf of the Florida Retail Federation.

d. There are a total of 4 pages.

e. The document attached for electronic filing is The Florida Retail Federation's Notice of Objections to Staff's First Set of Interrogatories.
 (see attached file: 120001.FRF.Obj2Staff1stINT.4-20-12.pdf)

Thank you for your attention and assistance in this matter.

Rhonda Dulgar

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GBW Gardner, Blst, Wiener, Wadsworth, Bowden,
Bush, Dee, LaVia & Wright, P.A. ATTORNEYS AT LAW

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Fuel and Purchased Power Cost)
Recovery Clause with Generating)
Performance Incentive Factor)
_____)

Docket No. 120001-EI
Submitted for Filing: April 20, 2012

**THE FLORIDA RETAIL FEDERATION'S NOTICE OF OBJECTIONS
TO STAFF'S FIRST SET OF INTERROGATORIES**

The Florida Retail Federation ("FRF"), pursuant to Rule 28-106.206, Florida Administrative Code, Fla. R. Civ. Proc. 1.340, and Order No. PSC-12-0061-PCO-EI, and by and through the Company's undersigned attorneys, hereby serves its objections to the First Set of Interrogatories propounded to the FRF by the Florida Public Service Commission Staff ("Staff") in the above-styled docket.

GENERAL OBJECTIONS

The Florida Retail Federation objects to any definitions or instructions that are inconsistent with the FRF's discovery obligations under applicable rules. If questions arise regarding the FRF's discovery obligations, the FRF will comply with applicable rules.

The FRF general objects to Staff's discovery requests to the extent that they call for data or information protected by the attorney-client privilege, the work product doctrine, the accountant-client, the trade secret privilege, or any other applicable privileges or protections that may be applicable to the FRF's information.

The FRF reserves the right to supplement its responses to the Staff's discovery requests if, and to the extent that, the FRF cannot locate responsive information or answers immediately due to either the volume or magnitude of the information involved in compiling or aggregating such information or answers, or if the FRF later discovers

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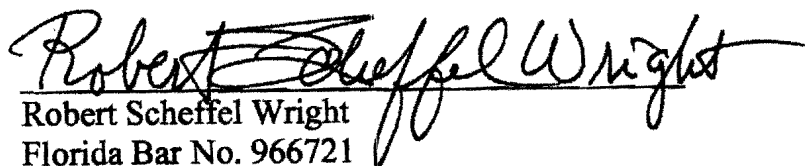
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additional responsive information that was not identified through diligent efforts in immediate response to the Staff's discovery requests.

In making these general objections, the FRF does not waive or otherwise relinquish its rights to assert any general or specific objections to the Staff's discovery requests, as appropriate.

Respectfully submitted this 20th day of April, 2012.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail this 20th day of April, 2012, to the following:

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