

Eric Fryson

From: Cope, Sandra C [Sandra.Cope@pgnmail.com]
Sent: Tuesday, September 18, 2012 2:00 PM
To: Filings@psc.state.fl.us
Cc: Lee Eng Tan; 'jbeasley@ausley.com'; 'Jwahlen@ausley.com'; 'jas@beggslane.com'; 'rab@beggslane.com'; 'srg@beggslane.com'; 'James Brew (jbrew@bbrslaw.com)'; 'ataylor@bbrslaw.com'; 'vkaufman@moylslaw.com'; 'jmoyle@moylslaw.com'; 'cmartin@fpucs.com'; 'sdriteno@southernco.com'; 'B.keating@gunster.com'; 'rehwinkel.charles@leg.state.fl.us'; 'regdept@tecoenergy.com'; 'RMiller@pcsposphate.com'; 'Rubin, Ken'; 'Ken.Hoffman@fpl.com'; Lewis Jr, Paul; 'suzannebrownless@comcast.net'; 'Samuel.miller@tyndall.af.mil'; 'bruce@flaseia.org'; 'george@cavros-law.com'
Subject: Docket 120002-EI - Filing PEF's Objections to SACE's 2nd Set of Interrogatories (No. 17)
Attachments: PEF'S OBJECTIONS TO SACE'S 2ND SET OF INTERROGATORIES.PDF



PEF'S
OBJECTIONS TO SACE'S

This electronic filing is made by:

Dianne Triplett
P. O. Box 14042
St. Petersburg, FL 33733
727-820-4692
Dianne.Triplett@pgnmail.com

Docket 120002-EI

In re: Energy Conservation Cost Recovery Clause

On behalf of Progress Energy Florida

Consisting of 4 pages

The attached document for filing is PEF's Objections to SACE's Second Set of Interrogatories (No. 17)

DOCUMENT NUMBER-DATE

06258 SEP 18 2012

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE
COMMISSION

In re: Energy Conservation Cost
Recovery Clause.

Docket No. 120002-EI

Submitted for Filing: Sept. 18,
2012

PEF'S OBJECTIONS TO SACE'S SECOND
SET OF INTERROGATORIES (No. 17)

Pursuant to Fla. Admin. Code R. 28-106.206, Rule 1.340 of the Florida Rules of Civil Procedure, and the Order Establishing Procedure, Progress Energy Florida, Inc. ("PEF") hereby serves its objections to the Southern Alliance for Clean Energy's ("SACE") Second Set of Interrogatories (Nos. 17) and states as follows:

GENERAL OBJECTIONS

With respect to the "Definitions" in SACE's Second Set of 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 any of SACE's definitions or instructions that are inconsistent with those rules. Furthermore, PEF objects to any interrogatory that calls for PEF to create data or information that it otherwise does not have because there is no such requirement under the applicable rules and law.

PEF objects to any definition or interrogatory that seeks to encompass persons or entities who are not parties to this action or that are not subject to discovery under applicable rules.

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FPSC-COMMISSION CLERK

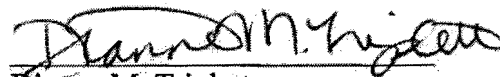
PEF also objects to any Interrogatory or Request for Production that purports to require PEF or its experts to prepare studies, analyses, or to do work for SACE that has not been done for PEF, presumably at PEF's cost.

Additionally, PEF generally objects to SACE's Second Set of Interrogatories to the extent that they call for data or information 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 also objects to any attempt by SACE to evade the numerical limitations set on interrogatories in the Order Establishing Procedure by asking multiple independent questions within single individual questions and subparts.

Finally, PEF reserves the right to supplement any of its responses to SACE's Second Set of Interrogatories if PEF cannot locate the answers immediately due to their magnitude and the work required to aggregate them, or if PEF later discovers additional responsive information in the course of this proceeding.

By making these general objections at this time, PEF does not waive or relinquish its right to assert additional general and specific objections to SACE's discovery at the time PEF's response is due.



Dianne M. Triplett
Associate General Counsel
PROGRESS ENERGY SERVICE COMPANY, LLC
299 First Avenue North
St. Petersburg, FL 33701
Telephone: (727) 820-4692
Facsimile: (727) 820-5519

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic and U.S. Mail this 18 day of September, 2012, to all parties of record as indicated below.


Dianne M. Triplett

Theresa Tan
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
Ltan@psc.state.fl.us

Cheryl Martin/Aleida Socarras
Florida Public Utilities Company
1641 Worthington Rd., Suite 220
West Palm Beach, FL 33409-6703
cmartin@fpucs.com

James D. Beasley/J. Jeffrey Wahlen
Ausley Law Firm
P.O. Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
jwahlen@ausley.com

Ms. Susan D. Ritenour
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0780
sdriteno@southernco.com

Jeffrey A. Stone/Russell A. Badders/
Steven R. Griffin
Beggs & Lane Law Firm
P.O. Box 12950
Pensacola, FL 32591
jas@beggslane.com
rab@beggslane.com
srg@beggslane.com

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 S. Monroe St., Suite 601
Tallahassee, FL 32301
B.keating@gunster.com

James W. Brew/F. Alvin Taylor
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson St., NW
Eighth Floor, West Tower
Washington, D.C. 20007
jbrew@bbrslaw.com
ataylor@bbrslaw.com

J.R. Kelly/P. Christensen/C. Rehwinkel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, #812
Tallahassee, FL 32399
rehwinkel.charles@leg.state.fl.us

Vicki G. Kaufman/Jon C. Moyle, Jr.
Moyle Law Firm
118 North Gadsden Street
Tallahassee, FL 32301
vkaufman@moylelaw.com
jmoyle@moylelaw.com

Ms. Paula K. Brown
Tampa Electric Company
P.O. Box 111
Tampa, FL 33601
regdept@tecoenergy.com

Randy B. Miller
White Springs Agricultural Chemicals, Inc.
P.O. Box 300
15843 Southeast 78th Street
White Springs, FL 32096
RMiller@pcsphosphate.com

Kenneth M. Rubin / John T. Butler
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, FL 33408-0420
Ken.rubin@fpl.com

Kenneth Hoffman
Florida Power & Light Company
215 S. Monroe Street, Suite 810
Tallahassee, FL 32301-1858
Ken.Hoffman@fpl.com

Paul Lewis, Jr.
106 East College Avenue, Suite 800
Tallahassee, FL 32301
Paul.LewisJr@pgnmail.com

Suzanne Brownless, Esq.
1301 Miccosukee Road
Tallahassee, FL 32308
suzannebrownless@comcast.net

Captain Samuel Miller
USAF/AFLOA/JACL-ULFSC
139 Barnes Drive, Suite 1
Tyndall AFB FL 32403-5319
Ph: 850-283-6663
Fax: 850-283-6219
Samuel.miller@tyndall.af.mil

Bruce Kershner
Florida Solar Energy Industries Association
231 West Bay Avenue
Longwood, FL 32750-4125
bruce@flaseia.org

George Cavros, Esq.
Southern Alliance for Clean Energy
120 East Oakland Park Blvd., Suite 105
Fort Lauderdale, FL 33334
george@cavros-law.com