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July 1, 2014

Ms. Carlotta Stauffer, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee FL 32399-0850

Dear Ms. Stauffer:

RE: Docket No. 130202-EI

Attached herein are Gulf Power Company's Objections to Southern Alliance for Clean Energy's Third Set of Interrogatories (Nos. 43-68).

Sincerely,

Robert L. McGee, Jr.

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Attachments

cc: Beggs & Lane
Jeffrey A. Stone

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric
conservation goals (Gulf Power Company).

Docket No.: 130202-EI
Filed: July 1, 2014

**GULF POWER COMPANY'S OBJECTIONS
TO THE SOUTHERN ALLIANCE FOR CLEAN
ENERGY'S THIRD SET OF INTERROGATORIES (43-68)**

Pursuant to Fla. Admin. Code R. 28-106.206, Rule 1.340 of the Florida Rules of Civil Procedure, and the Order Establishing Procedure in this matter, Gulf Power Company ("Gulf") hereby serves its objections to the Southern Alliance for Clean Energy's ("SACE") Third Interrogatories to Gulf Power Company (Nos. 43-68, and respectively, and together "(the Requests)") and states as follows:

GENERAL OBJECTIONS

With respect to any "Definitions" and "Instructions" in SACE's Interrogatories, Gulf objects to any definitions or instructions that are inconsistent with Gulf's discovery obligations under applicable rules. If some question arises as to Gulf's discovery obligations, Gulf will comply with applicable rules and not with any of SACE's definitions or instructions that are inconsistent with those rules. Gulf also objects to any request that calls for information that is not within the scope of discovery under the applicable rules and law. Furthermore, Gulf objects to any definition or request that seeks to encompass persons or entities other than Gulf, including Gulf's parent company or affiliates, who are not parties to this action and thus are not subject to discovery. No responses to the requests will be made on behalf of persons or entities other than Gulf. Gulf objects to any request that calls for Gulf to perform analyses that it has not otherwise performed in support of its case and would not normally perform in the ordinary course of its business because there is no such requirement under the applicable rules and law.

Additionally, Gulf generally objects to SACE's requests to the extent that they call for 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. Gulf 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 request calls for the production of privileged or protected information.

Further, in certain circumstances, Gulf may determine upon investigation and analysis that information responsive to certain requests to which objections are not otherwise asserted is 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, Gulf 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. Gulf 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.

Gulf generally objects to SACE's interrogatories to the extent that they call for the production of documents on the ground that such a request is beyond the scope of Rule 1.340 of the Florida Rules of Civil Procedure.

By making these general objections at this time, Gulf does not waive or relinquish its right to assert additional general and specific objections to SACE's discovery at the time Gulf's response is due under the Florida Rules of Civil Procedure and the Order Establishing Procedure. Gulf provides these general objections at this time to comply with the intent of the Order

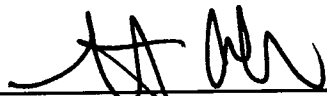
Establishing Procedure to reduce the delay in identifying and resolving any potential discovery disputes.

SPECIFIC OBJECTIONS

Interrogatory No. 46: Gulf objects to this interrogatory to the extent that it directs Gulf Power to provide the present value of capacity benefits, net fuel savings benefits and transmission/distribution benefits for each measure passing the Company's economic screening. Gulf is not in possession of this data and reproducing it would be unduly burdensome. Specifically, the requested data is not permanently stored in the Company's cost-effectiveness model when Gulf performs cost-effectiveness analysis for a given measure. In order to comply with SACE's request, Gulf would be required to re-run cost-effectiveness analysis for each of the 2,712 unique measures considered in this docket and isolate and record the requested data. This, in turn, would require significant time and resources which are presently not available.

Interrogatory 68: Gulf objects to this interrogatory on the grounds that it seeks information which is outside the scope of this proceeding, is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence.

Respectfully submitted this 1st day of July, 2014.



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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: **Commission review of numeric)**
conservation goals)

Docket No.: 130202-EI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by electronic mail this 1st day of July, 2014 to the following:

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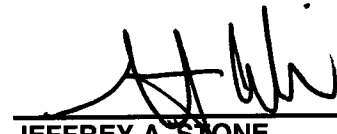
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