

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for Determination )  
of Need for Citrus County Combined ) DOCKET NO. 140110-EI  
Cycle Power Plant, by Duke Energy )  
Florida, Inc. )  
\_\_\_\_\_ )

In re: Petition for Determination )  
of Cost Effective Generation ) DOCKET NO. 140111-EI  
Alternative to Meet Need Prior to )  
2018, by Duke Energy Florida, Inc. ) SERVED: AUG. 20, 2014  
\_\_\_\_\_ )

**CALPINE CONSTRUCTION FINANCE COMPANY, L.P.'S  
OBJECTIONS TO STAFF'S SECOND SET OF INTERROGATORIES TO  
CALPINE CONSTRUCTION FINANCE COMPANY, L.P. (NOS. 5-6)**

Pursuant to Rule 28-106.206, Florida Administrative Code, Rule 1.340, Florida Rules of Civil Procedure ("F.R.C.P."), and the Order Establishing Procedure (as amended) in this docket, Calpine Construction Finance Company, L.P. ("Calpine") hereby files its objections to Staff's Second Set of Interrogatories (Nos. 5-6), which were propounded on Calpine on August 14, 2014.

**GENERAL OBJECTIONS**

Calpine generally objects to Staff's Second Set of Interrogatories on the grounds set forth in paragraphs A-C below. Each of Calpine's specific objections, and each of Calpine's responses, will be subject to and qualified by these general objections.

A. Calpine objects to any interrogatory that requests information protected by the attorney-client privilege, the work

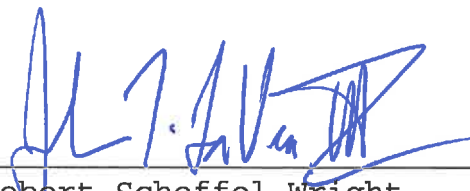
product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time response is first made to these interrogatories or is later determined to be applicable for any reason. Calpine in no way intends to waive any such privilege or protection. Calpine will provide a privilege log consistent with Florida law within a reasonable time or as may be agreed to by the parties to the extent that an interrogatory calls for the production of privileged or protected documents or information.

B. Calpine objects to any interrogatory that requests Calpine to divulge confidential proprietary business information and/or the compilation of information that is considered confidential proprietary business information. Calpine in no way intends to waive any applicable claim of confidentiality and will produce such information only under the terms of an appropriate confidentiality agreement and pursuant to the requirements of Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

C. Calpine objects to any definitions or instructions accompanying the interrogatories to the extent that they are inconsistent with and expand the scope of discovery specified in the Florida Rules of Civil Procedure that are incorporated into the Model Rules of Procedure or the Commission's rules on

discovery. If some question arises as to Calpine's discovery obligations, Calpine will comply with applicable rules and not with any of the definitions or instructions accompanying the discovery requests that are inconsistent with or exceed the requirements of those rules.

Respectfully submitted this 20th day of August, 2014.



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to the following, by electronic delivery, on this 20<sup>th</sup> day of August, 2014.

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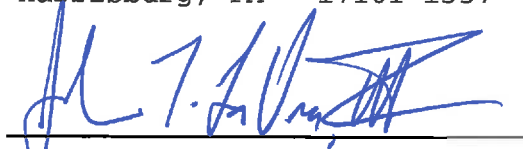
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