

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

---

In re: Petition for determination of need  
for Levy Units 1 and 2 nuclear power plants,  
by Progress Energy Florida, Inc.

---

Docket No. 080148-EI

Submitted for Filing: April 9, 2008

**PROGRESS ENERGY FLORIDA'S OBJECTIONS TO  
STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 4-15)**

Pursuant to Fla. Admin. Code R. 28-106.206 and Rule 1.350 of the Florida Rules of Civil Procedure, Progress Energy Florida, Inc. ("PEF") hereby serves its objections to Staff's Second Request for Production of Documents to PEF (Nos. 4-15), as follows:

**GENERAL OBJECTIONS**

PEF objects to any definitions or instructions that are inconsistent with PEF's discovery obligations under applicable rules.

**SPECIFIC OBJECTIONS**

Request 7: PEF objects to this request as overbroad, irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence. Subject to and without waiving this objection or PEF's general objections, PEF will provide portions of responsive documents, if any, that specifically and individually address Levy Units 1 and 2.

Request 9: PEF objects to this request as overbroad, irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence. Subject to and without waiving this objection or PEF's general objections, PEF will provide portions of responsive documents, if any, that specifically and individually address Levy Units 1 and 2.

Request 11: PEF objects to this request as overbroad, irrelevant, immaterial, and not likely to lead to the discovery of admissible evidence. Subject to and without waiving this objection or PEF's general objections, PEF will provide portions of responsive documents, if any, that specifically and individually address Levy Units 1 and 2.

R. Alexander Glenn  
Deputy General Counsel  
PROGRESS ENERGY SERVICE  
COMPANY, LLC  
Post Office Box 14042  
St. Petersburg, FL 33733-4042  
Telephone: (727) 820-5587  
Facsimile: (727) 820-5519

  
James Michael Walls  
Florida Bar No. 0706242  
Dianne M. Triplett  
Florida Bar No. 0872431  
CARLTON FIELDS, P.A.  
Post Office Box 3239  
Tampa, FL 33601-3239  
Telephone: (813) 223-7000  
Facsimile: (813) 229-4133

CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished to counsel and parties of record as indicated below via electronic and U.S. Mail this 9<sup>th</sup> day of April, 2008.

  
Attorney

Mr. Paul Lewis, Jr.  
Progress Energy Florida, Inc.  
106 East College Avenue, Ste. 800  
Tallahassee, FL 32301-7740  
Phone: (850) 222-8738  
Facsimile: (850) 222-9768  
Email: [paul.lewisjr@pgnmail.com](mailto:paul.lewisjr@pgnmail.com)

Katherine Fleming  
Staff Attorney  
Florida Public Service Commission  
2540 Shumard Oak Blvd  
Tallahassee 32399  
Phone: (850) 413-6218  
Facsimile: (850) 413-6184  
Email: [kflemmin@psc.state.fl.us](mailto:kflemmin@psc.state.fl.us)

Stephen C. Burgess  
Associate Counsel  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street  
Room 812  
Tallahassee, FL 32399-1400  
Phone: (850) 488-9330  
Facsimile:  
Email: [burgess.steve@leg.state.fl.us](mailto:burgess.steve@leg.state.fl.us)

Michael P. Halpin  
Siting Coordination Office  
2600 Blairstone Road, MS 48  
Tallahassee, FL 32301  
Phone: (850) 245-8002  
Facsimile: (850) 245-8003  
Email: [Mike.Halpin@dep.state.fl.us](mailto:Mike.Halpin@dep.state.fl.us)

Charles Gauthier  
Division of Community Planning  
2555 Shumard Oak Blvd.  
Tallahassee, FL 32399-2100  
Phone: (850) 487-4545  
Facsimile: (850) 488-3309  
Email: [charles.gauthier@dca.state.fl.us](mailto:charles.gauthier@dca.state.fl.us)

James W. Brew  
Brickfield Burchette Ritts & Stone, PC  
1025 Thomas Jefferson St NW  
8th FL West Tower  
Washington, DC 20007-5201  
Phone: (202) 342-0800  
Fax: (202) 342-0807  
Email: [jbrew@bbrslaw.com](mailto:jbrew@bbrslaw.com)

-and-

Karin S. Torain  
PCS Administration (USA), Inc.  
Suite 400  
Skokie Blvd.  
Northbrook, IL 60062  
Phone: (847) 849-4291  
Email: [KSTorain@potashcorp.com](mailto:KSTorain@potashcorp.com)