

Ruth Nettles

090079-EI

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Sent: Thursday, August 27, 2009 3:39 PM
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Subject: Electronic Filing Docket No. 090079
Attachments: PEF Object to Staffs 29th Interrogatories.pdf

Matthew R. Bernier, Carlton Fields, P.A., 215 South Monroe Street, Ste. 500, Tallahassee, FL 32301, mbernier@carltonfields.com is the person responsible for this electronic filing;

The filing is to be made in Docket 090079-EI, In re: Petition for rate increase in rates by Progress Energy Florida, Inc.;

The total number of pages is 3;

The attached document is Progress Energy Florida's Objections to Staff's Twenty-Ninth Set of Interrogatories (Nos. 331-364).

Thank you

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE:
PETITION FOR INCREASE IN RATES
BY PROGRESS ENERGY FLORIDA, INC.

Docket No. 090079-EI
Submitted for filing: August 27, 2009

**PEF'S OBJECTIONS TO STAFF'S TWENTY-NINTH
SET OF INTERROGATORIES (NOS. 331-364)**

Pursuant to Fla. Admin. Code R. 28-106.206, Rule 1.350 of the Florida Rules of Civil Procedure, and the Order Establishing Procedure in this matter, Progress Energy Florida, Inc. ("PEF") hereby serves its objections to the Florida Public Service Commission Staff's ("Staff") Twenty-Ninth Set of Interrogatories (Nos. 331-364) and states as follows:

GENERAL OBJECTIONS

PEF will make all responsive documents available for inspection and copying at the offices of PEF, 106 E. College Ave., Suite 800, Tallahassee, Florida, 32301 at a mutually-convenient time, or will produce the documents in some other manner or at some other place that is mutually convenient to both PEF and Staff for purposes of inspection, copying, or handling of the responsive documents.

With respect to any "Definitions" and "Instructions" in Staff's 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 Staff's definitions or instructions that are inconsistent with those rules.

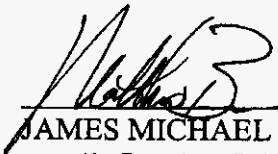
SPECIFIC OBJECTIONS

Request 341: PEF objects to Staff's Interrogatory number 341 to the extent it seeks information from 2011-2013. This information is irrelevant to this proceeding and is not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, the information requested, including the 2010 information, was not relied upon, considered, reviewed, or even requested by Witness Robinson. PEF will provide the 2010 information as requested, but must object to providing the 2011-2013 information as irrelevant.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via electronic and U.S. Mail to the following counsel of record as indicated below on this 27th day of August, 2009.


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