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100009-EI

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**Sent:** Monday, July 26, 2010 2:10 PM  
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**Subject:** Emailing: Docket 100009 PEF Objections to Staff 8th Interrogatories.pdf  
**Attachments:** Docket 100009 PEF Objections to Staff 8th Interrogatories.pdf



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<<Docket 100009 PEF Objections to Staff 8th Interrogatories.pdf>> Docket  
100009 In re: Nuclear Cost Recovery Clause

Attached for filing is Progress Energy Florida's Objections to Staff's Eighth Set of Interrogatories to Progress Energy Florida (No. 29).

This document consists of four (4) pages.

This document is being filed on behalf of Progress Energy Florida by

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DOCUMENT NUMBER-DATE

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Nuclear Cost Recovery  
Clause

Docket No. 100009-EI  
Submitted for filing: July 26, 2010

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**PROGRESS ENERGY FLORIDA'S OBJECTIONS TO STAFF'S EIGHTH  
SET OF INTERROGATORIES TO PROGRESS ENERGY FLORIDA (NO. 29)**

Pursuant to Fla. Admin. Code R. 28-106.206, Rules 1.340 and 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's Staff's ("Staff") Eighth Set of Interrogatories (No. 29) and states as follows:

**GENERAL OBJECTIONS**

If any interrogatory is to be answered through production of documents pursuant to Florida Rule of Civil Procedure 1.340(c), PEF will make any and 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 OBJECTION**

**Interrogatory No. 29:** PEF objects to Staff's interrogatory number 29 because it seeks to require PEF to perform additional analyses and studies that have not been performed by or for PEF previously. PEF does not have all of the information to respond exactly like Staff requests, but notwithstanding this objection, PEF will respond to the interrogatory using a slightly different process to arrive at the answer Staff requests.

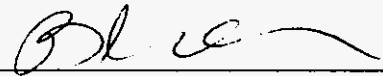
Respectfully submitted this 26<sup>th</sup> day of July, 2010.

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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 20<sup>th</sup> day of July, 2010.



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