

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Nuclear Cost Recovery
Clause

Docket No. 120009-EI
Submitted for filing: May 29, 2012

**PROGRESS ENERGY FLORIDA, INC.'S OBJECTIONS TO
CITIZENS' FIRST SET OF INTERROGATORIES (NOS. 1-10)**

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, Order No. PSC-11-0179-PCO-EI, issued March 29, 2011 (the "Order"), in this matter, Progress Energy Florida, Inc. ("PEF") hereby serves its objections to Office of Public Counsel's ("Citizens" or "OPC") First Set of Interrogatories (Nos.1-10) and states as follows:

INTRODUCTION

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 OPC for purposes of inspection, copying, or handling of the responsive documents.

Additionally, PEF will not provide information or documents 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 in response to these interrogatories. PEF will provide a privilege log in accordance with the applicable law or as may

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be agreed to by the parties to the extent, if at all, that any interrogatory calls for the production of privileged or protected information or documents.

OBJECTIONS

With respect to the “Definitions” and “Instructions” in OPC’s First Set of Interrogatories, PEF objects to the Definitions that seek to encompass persons or entities other than PEF who are not parties to this action and thus are not subject to discovery. No responses to the interrogatories will be made on behalf of persons or entities other than PEF.

In addition, PEF object to OPC’s Instructions to the extent they seek to encompass documents or information outside of PEF’s possession, custody, or control.

Interrogatory No. 1: PEF objects to interrogatory number 1 because it calls for speculation and conjecture about future unknown events. Additionally, PEF objects because this interrogatory seeks to require PEF to perform analysis that it has not performed and would not otherwise perform. This interrogatory is also vague and ambiguous because it provides no actual time frame for the requested analysis.

Interrogatory No. 8: PEF objects to interrogatory number 8 because it calls for speculation and conjecture about future unknown events and is further vague and ambiguous and unclear in scope. Additionally, PEF objects because this interrogatory seeks to require PEF to perform analysis that it has not performed and would not otherwise perform.

Respectfully submitted this 29th day of May, 2012.

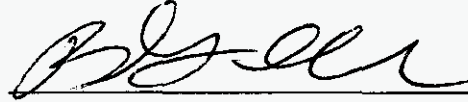
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CERTIFICATE OF SERVICE

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 29th day of May, 2012.



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