

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of numeric conservation goals (Florida Power & Light Company).

DOCKET NO. 130199-EI

In re: Commission review of numeric conservation goals (Duke Energy Florida, Inc.).

DOCKET NO. 130200-EI

In re: Commission review of numeric conservation goals (Tampa Electric Company).

DOCKET NO. 130201-EI

In re: Commission review of numeric conservation goals (Gulf Power Company).

DOCKET NO. 130202-EI

In re: Commission review of numeric conservation goals (JEA).

DOCKET NO. 130203-EM

Dated: April 11, 2014

**JEA'S OBJECTIONS TO SIERRA CLUB'S FIRST SET OF INTERROGATORIES (NOS. 1-19) AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1)**

JEA, pursuant to Rule 28-106.206, Florida Administrative Code, Rule 1.340, Florida Rules of Civil Procedure, and the the Order Consolidating Dockets and Establishing Procedure in this matter (Order No. PSC-13-0386-PCO-EU), hereby serves its Objections to Sierra Club's First Set of Interrogatories (Nos. 1-19) and First Request for Production of Documents (No. 1).

**GENERAL OBJECTIONS**

1. JEA objects to any definitions or instructions in the Sierra Club's First Set of Interrogatories (Nos. 1-19) or Request for Production of Documents (No. 1) that are inconsistent with JEA's discovery obligations under applicable rules. JEA will comply with applicable rules and not with any of the Sierra Club's definitions or instructions that are inconsistent with those rules. JEA also objects to any definition or interrogatory that seeks to encompass persons or entities other than JEA who are not parties to this action and thus are not subject to discovery. No responses will be made on behalf of persons or entities other than JEA.

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INTERROGATORIES (NOS. 1-19) AND FIRST REQUEST  
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2. JEA objects to each interrogatory, request for production of documents, and instruction to the extent it would require JEA to divulge information that is exempt from discovery under the attorney-client privilege, the attorney work product privilege, or any other applicable privilege.

3. JEA objects to each interrogatory, request for production of document, and instruction to the extent it would require JEA to divulge proprietary confidential business information without protective measures necessary to prevent disclosure.

4. JEA objects to each interrogatory to the extent it calls for JEA to prepare information in a particular format or to perform calculations or analyses not previously prepared or performed as purporting to expand JEA's obligations under applicable law.

5. Subject to and without waiving the foregoing objections, JEA will attempt to respond to these discovery requests in accordance with applicable rules of procedure and requirements of the Order Consolidating Dockets and Establishing Procedure.

Dated this 11th day of April, 2014.

HOPPING GREEN & SAMS, P.A.

/s/Gary V. Perko

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail and U.S. mail, this 11th day of April, 2014, to the following:

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