

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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In re: Application for limited proceeding for recovery of incremental storm restoration costs related to Hurricanes Irma and Nate by Duke Energy Florida, LLC

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Docket No. 20170272-EI

Dated: January 22, 2019

**DUKE ENERGY FLORIDA, LLC'S OBJECTIONS TO THE OFFICE OF PUBLIC COUNSEL'S THIRD SET OF INTERROGATORIES (NOS. 65-66) AND THIRD REQUEST TO PRODUCE DOCUMENTS (NOS. 16-17)**

Pursuant to Order No. PSC-2018-0082-PCO-EI, the Order Establishing Procedure ("OEP"), PSC-2018-0127-PCO-EI, the First Order Modifying Order Establishing Procedure, and PSC-2018-0487-PCO-EI, the Second Order Modifying Order Establishing Procedure, Rule 28-106.206, Florida Administrative Code ("F.A.C."), and Rule 1.340, Florida Rules of Civil Procedure, Duke Energy Florida, LLC ("DEF") hereby serves its objections to the Office of Public Counsel's ("OPC") Third Set of Interrogatories (Nos. 65-66) and Third Request to Produce Documents (16-17) and states as follows:

**GENERAL OBJECTIONS**

With respect to the "Definitions" and "Instructions" in OPC's Third Set of Interrogatories and Third Request to Produce Documents, DEF objects to any definitions or instructions that are inconsistent with DEF's discovery obligations under applicable rules. If some question arises as to DEF's discovery obligations, DEF will comply with applicable rules and not with any of OPC's definitions or instructions that are inconsistent with those rules. Furthermore, DEF objects to any interrogatory or document request that calls for DEF to create data or information that it otherwise does not have because there is no such requirement under the applicable rules and law.

DEF objects to any definition or interrogatory or document request that seeks to encompass persons or entities who are not parties to this action or that are not subject to discovery under applicable rules.

Additionally, DEF generally objects to OPC's interrogatories or document requests to the extent that they call for data or information 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.

Finally, DEF objects to any attempt by OPC to evade any numerical limitations set on interrogatories by asking multiple independent questions within single individual questions and subparts. By making these general objections at this time, DEF does not waive or relinquish its right to assert additional general and specific objections to OPC as they become known.

Respectfully submitted,

*/s/ Matthew R. Bernier*

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