Progress Energy

January 14, 2009

Mr. Charles Terreni
Chief Clerk/Administrator
South Carolina Public Service Commission
101 Executive Drive
Columbia, SC 29210

RE: Docket No. 2008-251-E

Dear Mr. Terreni:

Please find enclosed for filing in the above-referenced docket Progress Energy Carolinas, Inc.'s Interrogatories and Request for Production of Documents.

Yours very truly,

Len S. Anthony/mhm

Len S. Anthony
General Counsel
Progress Energy Carolinas, Inc.

LSA:mhm

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Progress Energy Service Company, LLC
P.O. Box 1551
Raleigh, NC 27602

BEFORE

THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2008-251-E

IN RE: Application of Carolina Power and Light Company d/b/a Progress Energy Carolinas, Incorporated for the Establishment of Procedures for DSM/EE Programs	))))))	**CERTIFICATE OF SERVICE**

I, Len S. Anthony, hereby certify that Progress Energy Carolinas, Inc.'s Interrogatories and Request for Production of Documents have been served on all parties of record either by hand delivery, email, or by depositing said copy in the United States mail, postage prepaid, addressed as follows:

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This 14th day of January, 2009.

Len S. Anthony /mbm

Len S. Anthony
General Counsel

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2008-251-E

IN RE: Application of Carolina Power and Light Company d/b/a Progress Energy Carolinas, Incorporated for the Establishment of Procedures for DSM/EE Programs	)))))	**PROGRESS ENERGY CAROLINAS, INC. INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Public Service Commission of South Carolina Regulation 103-833, Progress Energy Carolinas, Inc. ("PEC") propounds the following interrogatories and request for production of documents to the Southern Environmental Law Center, the Natural Resources Defense Council, the Coastal Conservation League and the Southern Alliance for Clean Energy. PEC requests that the information and documents requested be provided within 15 days of receipt of this request by the Southern Environmental Law Center, the Natural Resources Defense Council, the Coastal Conservation League and the Southern Alliance for Clean Energy.

Each of the interrogatories should be answered individually by the Southern Environmental Law Center, the Natural Resources Defense Council, the Coastal Conservation League and the Southern Alliance for Clean Energy.

PROGRESS ENERGY CAROLINAS, INC.

_____

Len S. Anthony
General Counsel
410 South Wilmington Street
Raleigh, NC 27610

(Your company name)

Request:

1. State the definition of a "member" for your organization.

Response:

(Your company name)

Request:

2. State every requirement for a person or corporation to become a "member" of your organization.

Response:

(Your company name)

Request:

3. For calendar year 2008, how many of your members were located in South Carolina and were customers of Progress Energy Carolinas, Inc.?

Response:

(Your company name)

Request:

4. Did your organization notify your members located in South Carolina served by Progress Energy Carolinas that your organization intended to petition to intervene in Public Service Commission of South Carolina Docket No. 2008-251-E?

Response:

(Your company name)

Request:

5. If your answer to interrogatory number four (4) was yes, please describe in detail the communication provided by your organization to such member or members.

Response:

(Your company name)

Request:

6. If your answer to interrogatory number four (4) was in the affirmative, how many of your members located in South Carolina served by Progress Energy Carolinas responded to such communication? For those members who responded to such communication, how many members indicated in their response that they agreed with or supported your organization's intervention in such proceeding?

Response:

(Your company name)

Request:

7. For calendar year 2008, state the total aggregate monetary contribution to your organization by your members located in South Carolina served by Progress Energy Carolinas.

Response:

(Your company name)

Request:

8. Please state the number of communications by your organization to your members located in South Carolina served by Progress Energy Carolinas.

Response:

(Your company name)

Request:

9. For each communication made by your organization to your members located in South Carolina served by Progress Energy Carolinas in calendar year 2008, state the substance of the communication.

Response:

(Your company name)

Request:

10. Please state the dates of each of the communications during calendar year 2008 by your organization to your members located in South Carolina served by Progress Energy Carolinas.

Response:

(Your company name)

Request:

11. During calendar year 2008, did anyone from your organization meet face-to-face or have a telephone conversation with any of your members located in South Carolina served by Progress Energy Carolinas? If your answer is "yes", please state whether the communication was a face-to-face meeting or a telephone conversation, the number of such members that a representative of your organization spoke with, and the substance of the communication.

Response:

(Your company name)

Request:

12. Please provide all documents (including documents in electronic format, such as e-mail) provided by your organization to your members and all documents provided to your organization by your members during calendar year 2008.

Response:

(Your company name)

Request:

13. Please provide the names of all "members" of your organization that live in South Carolina and were customers of Progress Energy Carolinas, Inc. in 2008.

Response:

(Your company name)

Request:

The following question is directed only to the Southern Environmental Law Center and the Natural Resources Defense Council:

14. Please identify where on your websites there are references to "member" or "members", and where there is any discussion of how a person or other entity becomes a "member" of your organization.

Response: