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IN REPLY REFER TO

August 30, 2002

Ansley Watson, Jr.
P.O. Box 1531
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e-mail: aw@macfar.com

VIA FEDERAL EXPRESS

Blanca S. Bayo, Director
Division of Commission Clerk & Administrative Services
Florida Public Service Commission
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

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Re: Docket No. 020384-GU -- Application for a rate increase by Tampa Electric Company d/b/a PEOPLES GAS SYSTEM

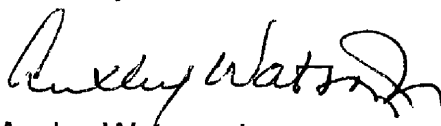
Dear Ms. Bayo:

Enclosed herewith for filing in the above docket on behalf of Peoples Gas System, please find the original and 20 copies of Peoples' Consolidated Objections to Citizens' First Set of Interrogatories (Nos. 1-49) and First Set of Requests for Production of Documents (Nos. 1-71), together with a diskette containing the document.

Please acknowledge your receipt and the date of filing of the enclosures on the enclosed duplicate copy of this letter, and return the same to me in the envelope provided.

Thank you for your assistance.

Sincerely,



Ansley Watson, Jr.

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Parties of Record
Matthew R. Costa, Esquire
Ms. Angela Llewellyn

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for a rate increase)
by Tampa Electric Company d/b/a)
Peoples Gas System)
_____)

Docket No. 020384-GU

Submitted for Filing:
9-3-02

**PEOPLES GAS SYSTEM'S
CONSOLIDATED OBJECTIONS TO CITIZENS'
FIRST SET OF INTERROGATORIES (NOS. 1-49)
AND FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS (NOS. 1-71)**

Peoples Gas System ("Peoples" or the "Company") hereby submits the following consolidated objections to the Citizens' First Set of Interrogatories (Nos. 1-49) (the "Interrogatories") and First Set of Requests for Production of Documents (Nos. 1-71) (the "Requests") to Peoples:

I. PRELIMINARY NATURE OF OBJECTIONS

The objections stated herein are preliminary in nature and are filed pursuant to the requirement that objections be served within ten days of service of discovery requests. If additional grounds for objection are discovered as Peoples develops its responses, Peoples reserves the right to supplement or modify its objections up to the time it serves its responses. Peoples reserves the right to file a motion with the Commission seeking a protective order at the time its response is due if Peoples determines such an order is necessary with respect to any of the information requested of the Company.

II. GENERAL OBJECTIONS

1. Peoples objects to each Interrogatory and Request to the extent it calls for production or disclosure of information protected by the attorney-client privilege, the work

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product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time response is first made or is later determined to be applicable for any reason. Peoples does not intend in any way to waive any such privilege or protection.

2. Peoples objects to any Interrogatory or Request that seeks the production of confidential or proprietary business information and/or the compilation of information that is considered confidential or proprietary business information. Peoples has not had sufficient time to determine the extent to which the Requests call for the disclosure of such information. However, if it so determines, it will either file a motion for protective order requesting confidential classification and procedures for protection or take other actions to protect the confidential information requested. Peoples does not intend in any way to waive claims of confidentiality.

3. Peoples objects to each Interrogatory and Request to the extent that the same exceed the proper scope of the Commission's inquiry about utility affiliates and/or the proper scope of discovery. Under Sections 366.05(9) and 366.093(1), *Florida Statutes*, the jurisdiction of the Commission with respect to the parent and affiliates of a utility is limited. Further, the scope of discovery from a party is limited to documents within the possession, custody or control of that party. See, e.g., *Southern Bell Telephone and Telegraph Co. v. Deason*, 632 So.2d 1377 (Fla. 1994). Peoples' parent and affiliates are not parties to the proceeding in this docket.

4. Peoples objects to each Interrogatory and Request to the extent that it seeks information that is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

5. Peoples objects to the instructions and to each Interrogatory and Request to the extent that they purport to impose upon Peoples obligations that Peoples does not have under the law or applicable rules of procedure.

6. Peoples conducts its utility operations throughout the State of Florida, and maintains a number of different offices and other locations throughout its service areas. In the course of its business, Peoples' employees create numerous documents that are not subject to the Commission's or other governmental record retention requirements. These documents are kept in numerous locations and moved from one location to another as employees change jobs or as the Company's business is reorganized. Therefore, it is possible that not every relevant responsive document can reasonably be consulted in developing Peoples's responses. Rather, Peoples's responses will provide all the information that Peoples is able to obtain after a reasonable and diligent search conducted in connection with the Citizens' Requests. To the extent that the Requests purport to require more, Peoples objects on the grounds that compliance would impose undue burden or expense on Peoples.

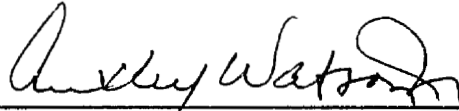
7. Peoples objects to the request that responsive documents be produced at the Offices of the Public Counsel in Tallahassee. Peoples is required only to produce documents at a reasonable time, place, and manner. The documents requested by the

Citizens' Requests are exceedingly voluminous, and the production of the same as set forth in the Request would impose undue burden or expense on Peoples.

8. Peoples objects to the Interrogatories and Requests to the extent that they require Peoples to create documents which do not already exist.

9. Peoples asserts the foregoing general objections with respect to each of the Requests as though separately stated as to each.

Respectfully submitted this 30th day of August, 2002.



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(813) 273-4321

and

Matthew R. Costa
Legal Department
TECO Energy, Inc.
P. O. Box 111
Tampa, Florida 33601-0111

Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Peoples Gas System's Consolidated Objections to Citizens' First Set of Interrogatories (Nos. 1-49) and First Set of Requests for Production of Documents (Nos. 1-71) has been furnished by regular U.S. Mail this 30th day of August, 2002, to the following:

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