ORIGINA

MACFARLANE FERGUSON & McMullen

ATTORNEYS AND COUNSELORS AT LAW

500 SOUTH FLORIDA AVENUE SUITE 240 LAKELAND, FLORIDA 33801 (863) 680-9908 FAX (863) 683-2849 400 NORTH TAMPA STREET, SUITE 2300 P O BOX (53) (2)P 3360() TAMPA, FLORIDA 33602 (813) 273-4200 FAX (813) 273-4396

625 COURT STREET P O BOX (669 (ZIP 33757) CLEARWATER, FLORIDA 33756 (727) 441-8966 FAX (727) 442-8470

IN REPLY REFER TO

October 25, 2002

الي Ansley Watson P.O. Box 1531 Tampa, Florida 3360 e-mail: aw@macfar con

VIA FEDERAL EXPRESS

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

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

Dear Ms. Bayo:

Enclosed for filing in the above docket on behalf of Peoples Gas System, please find the original only of Peoples' Response to Staff's Fourth Request for Production of Documents to Peoples Gas System (Nos. 26-30).

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

Sincerely.

Thank you for your assistance.

AUS ANSLEY WÁTSON, JR. CMP COM AWjr/a CTR Enclosures OPC MMS RECEIVED & FILED 11771 OCT 28 8 FPSC-BUREAU OF RECORDS

FPSC-COMMISSION CLERK

Blanca S. Bayo, Director October 25, 2002 Page 2

Parties of Record CC:

Ms. Angela Llewellyn Matthew R. Costa, Esquire

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application for a rate increase by :

Docket No. 020384-GU

Tampa Electric Company d/b/a Peoples : Gas System :

Submitted for Filing:

10-28-02

PEOPLES' RESPONSE TO STAFF'S FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES GAS SYSTEM (Nos. 26-30)

Peoples Gas System ("Peoples" or the "Company"), by its undersigned attorneys, files its Response to Staff's Fourth Request for Production of Documents (Nos. 26-30) (the "Request") and, as to the correspondingly numbered categories of the Request, says:

- 26. No costs have been incurred to date for the new customer retention program.
- 27. Work papers used in calculating O&M amounts identified as Other Not Trended in the Company's MFRs Schedule G-2 were provided to the Commission Staff (L. Romig) under cover of letter from Francis J. Sivard dated July 19, 2002.
- 28. Journal entries related to the airplane usage, together with usage logs have been sent to counsel for the Commission Staff.
- 29. Copies of the contracts for residential and small commercial meters and regulators with American Meters and Actaris, both of which are considered by the Company to be proprietary confidential business information, have been sent to counsel for the Commission Staff.
- 30. This category of the Request seeks a copy of the applicable service contract for the installation of meters if the answer to Staff Interrogatory No. 96 ("Is the installation of meters provided by employees of Peoples?") is no. The answer to Staff Interrogatory No. 96 is yes. However, copies of purchase orders (which become the contracts) for

DOCUMENT NUMBER-DATE
| 1 | 7 7 | OCT 28 %

FPSC-COMMISSION CLERK

meters that have been installed by contractors have been sent to counsel for the Commission Staff.

ANSLEY WATSON, JR.

Macfarlane Ferguson & McMullen

P. O. Box 1531

Tampa, Fiorida 33601-1531

(813) 273-4321

and

MATTHEW R. COSTA Legal Department TECO Energy, Inc. P. O. Box 111 Tampa, Florida 33601-1531 (813) 228-4938

Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Response has been furnished by hand delivery* or regular U.S. Mail to the following, this 25th day of October, 2002:

John W. McWhirter, Jr., Esquire* McWhirter, Reeves, McGlothlin *et al.* P. O. Box 3350 Tampa, Florida 33601-3350

Adrienne E. Vining, Esquire
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Donna DeRonne Larkin & Associates, PLLC 15728 Farmington Road Livonia, Michigan 48154

Vicki Gordon Kaufman, Esquire Timothy J. Perry, Esquire McWhirter, Reeves, McGlothlin *et al.* 117 S. Gadsden Street Tallahassee, Florida 32301 H. F. Rick Mann, Esquire Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street Room 812 Tallahassee, Florida 32399-1400

Robert Scheffel Wright, Esquire Diane K. Kiesling, Esquire John T. Lavia, III, Esquire Landers & Parsons, P.A. 310 W. College Avenue Tallahassee, Florida 32301

Jim Downs Manager, Fuels Regulatory Calpine Energy Services, L.P. 700 Louisiana Street - Suite 2700 Houston, Texas 77002 Joseph A. Regnery
Senior Counsel
Calpine Eastern Corporation
2701 N. Rocky Point Drive
Suite 1200
Tampa, Florida 33607

Roman J. Bakke Manager, Fuels Supply Calpine - Eastern Regional Office The Pilot House - 2nd Floor Lewis Wharf Boston, Massachusetts 02110

Ansley Watson, Jr.

H:\ANSLEY_W\PGS\Ratecase\Staff-resp-rfp-4.wpd