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February 9, 2001

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Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, FL 32399-0850

Re: Docket No.000061-EI

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Allied Universal Corporation and Chemical Formulators, Inc. ("Allied/CFI") are the original and fifteen copies of Allied/CFI's Amended Notice of Intent to Request Confidential Classification.

Please acknowledge receipt of these documents by date stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

CAF
CMP
COM
GTR
ECR
LEG
OPC
PAI
RGO
BEC
JRE/vp
Enclosures
CC: Parties of Record

APP

7/ .

Yohn R Ellis

DOCUMENT NUMBER-DATE

01941 FEB-95

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Allied Universal)	
Corporation and Chemical Formulators,)	
Inc. against Tampa Electric Company)	
for violation of Sections 366.03,)	Docket No. 000061-EI
366.06(2) and 366.07, Florida Statutes,)	
with respect to rates offered under)	
Commercial/Industrial Service Rider tariff;)	
petition to examine and inspect confidential)	Filed: February 9, 2001
information; and request for expedited)	
relief.)	
	_)	

ALLIED/CFI'S AMENDED NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

Allied Universal Corporation ("Allied") and it affiliate, Chemical Formulators, Inc. ("CFI") (collectively "Allied/CFI"), by and through their undersigned counsel and pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, and Order No. PSC-01-0351-PCO-EI issued February 7, 2001, file this Amended Notice of Intent to Request Confidential Classification, and state as follows:

- 1. On January 30, 2001, Allied/CFI filed one set of copies of a group of documents (Bates stamped pages 0000350-0000440A) in response to Tampa Electric Company's ("TECO") First Request for Production of Documents. Allied/CFI asserts that the documents are protected against disclosure by the attorney-client privilege and the attorney work product privilege.
- 2. Pursuant to the Order Requiring Support for Claim of Attorney-Client Privilege and Work Product Privilege, Order No. PSC-01-0351-PCO-EI issued February 7, 2001, Allied/CFI provides the following additional description of the nature of the documents and the basis for Allied/CFI's claim of privilege.

DOCUMENT NUMBER-DATE

0 1 9 4 1 FEB -9 5

EPSC-RECORDS/REPORTING

3. The documents are the contents of a file named "OD Manufacturing" identified at the deposition of Mr. Robert M. Namoff taken on February 8, 2001 in this action as "Odyssev

Manufacturing." (List attached as Exhibit A)

4. The file consists of: (1) correspondence from Allied/CFI's counsel, Daniel K.

Bandklayder, to Allied/CFI's Chief Executive Officer, Mr. Namoff, reporting and providing copies

of the results of investigations performed by Mr. Bandklayder at the request of Mr. Namoff

concerning Odyssey Manufacturing Company; (2) copies of Mr. Namoff's notes concerning the

results of those investigations and (3) photographs of Odyssey's plant.

5. The file also contains copies of correspondence between Allied/CFI's undersigned

counsel and Mr. Namoff dated August 24, 2000, concerning this action.

6. The investigations performed by Mr. Bandklayder at Mr. Namoff's request, and the

correspondence and notes concerning those investigations were intended to be and have been treated

as confidential and privileged under the attorney-client privilege and the attorney work product

privilege at all times by Allied/CFI and its counsel in this action.

7. The original of this Amended Notice is being filed with the Division of Records and

Reporting and a copy is being served on all counsel of record.

Respectfully submitted,

Kenneth A. Noffman, Esq.

John R. Ellis, Esq.

Rutledge, Ecenia, Purnell & Hoffman, P.A.

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Attorneys for Allied Universal Corporation and Chemical Formulators, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Allied/CFI's Amended Notice of Intent to Request Confidential Classification was furnished as indicated below to the following this 9th day of February, 2001.

Robert V. Elias, Esq.
Marlene Stern, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard, Room 370
Tallahassee, Florida 32399-0850

Via Hand Delivery

Lee L. Willis, Esq.
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Via U.S. Mail

Harry W. Long, Jr., Esq. TECO Energy, Inc. Legal Department P. O. Box 111 Tampa, FL 33601

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Patrick K. Wiggins, Esq. Wiggins & Villacorta P. O. Box 1657 Tallahassee, FL 32302

Via U.S. Mail

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Via telecopier

Scott J. Fuerst, Esq. Ruden, McClosky, et al. 200 East Broward Blvd. Ft. Lauderdale, FL 33301 Via U.S. Mail

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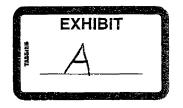
Via U.S. Mail

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The Attorney-Client and Attorney Work Product Privileges encompass the following documents and corresponding Bates stamped pages:

Handwritten notes and business cards	350-351
Pictures	352-356
Correspondence between Mr. Namoff and Daniel Bandklayder dated April 1, 1999	357
Fla. Division of Corporations Lien Inquiry for Odyssey Manufacturing Corporate Inquiry for Odyssey Manufacturing Director Inquiry for Odyssey Manufacturing Corporate Inquiry for Odyssey Marketing Corp. Director Inquiry for Odyssey Marketing Corporate Inquiry for Homestead Bayfront Yacht Club Director Inquiry for Homestead Bayfront Yacht Club	358 359 360 361 362 363 364
Correspondence between Bob Namoff and Daniel Bandklayder dated April 5, 1999	365
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Collateral agreement between Odyssey and Citizen's Bank Document describing Tampa tract of land	372 373
Collateral agreement between Odyssey and Citizen's Bank Document describing Tampa tract of land Taxes assessed to Berry Packaging Correspondence between John Ellis and Robert Namoff	372373374
Collateral agreement between Odyssey and Citizen's Bank Document describing Tampa tract of land Taxes assessed to Berry Packaging Correspondence between John Ellis and Robert Namoff dated August 24, 2000 Correspondence between Bob Namoff and	372373374375-376
Collateral agreement between Odyssey and Citizen's Bank Document describing Tampa tract of land Taxes assessed to Berry Packaging Correspondence between John Ellis and Robert Namoff dated August 24, 2000 Correspondence between Bob Namoff and Daniel Bandklayder dated April 15, 1999 Record Ownership and Encumbrance Report from	372373374375-376377



Special Warranty Deed from Berry Packaging	397-400
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Collateral agreement between Odyssey and Citizen's Bank	402
Notice of Commencement from Michigan	403-407
Record Ownership and Encumbrance Report from Fidelity National Title	408-410
Assignments of Rents between Odyssey and Citizens Bank	411-415
Notice of Commencement from Hillsborough County	416
Correspondence between Robert Namoff and Daniel Bandklayder	417-418
Articles of Incorporation and Michigan Annual Reports for Odyssey Manufacturing	419-438
Correspondence between Daniel Bandklayder and Bob Namoff dated September 5,2000	439-440
Correspondence between Jim Palmer and Bob Namoff re: investigation of Realty	440-A