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July 2, 2001

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Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance
Incentive Factor; FPSC Docket No. 010001-EI

Dear Ms. Bayo:

Enclosed for filing in the above docket is the original and fifteen (15) copies of Tampa
Electric Company's Objection to the Second Set of Interrogatories (Nos. 31) of the Florida
Industrial Power Users Group.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this
letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,

Lee L. Willis

LLW/pp
Enclosures

cc: All parties of record (w/encls.)

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery)
Clause with Generating Performance Incentive) DOCKET NO. 010001-EI
Factor.) FILED: July 2, 2001
_____)

**TAMPA ELECTRIC COMPANY'S OBJECTION
TO FIPUG'S SECOND SET OF INTERROGATORIES (NO. 31)**

Tampa Electric Company ("Tampa Electric" or "the company") submits the following Objection to Florida Industrial Power Users Group's ("FIPUG") Second Set of Interrogatories to Tampa Electric Company No. 31 and, as grounds therefor, says:

Preliminary Nature of These Objections

The objections stated herein are preliminary in nature and should additional grounds for objections be discovered, the company reserves the right to supplement or revise or modify its objections. Should Tampa Electric determine that a further protective order is necessary with respect to any of the information requested, Tampa Electric reserves the right to file a motion with the Commission.

Motion for Protective Order

7. Tampa Electric's objections to FIPUG's discovery requests are submitted pursuant to the authority contained in Slatnick v. Leadership Housing Systems of Florida, Inc., 368 So. 2d 78 (Fla. 3rd DCA 1979). To the extent that a Motion for Protective Order is required, Tampa Electric's objections are to be construed as a request for a Protective Order.

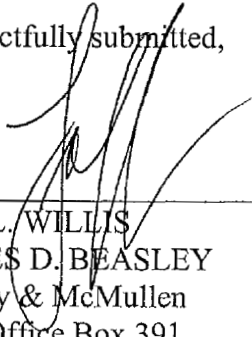
Objections to Specific Interrogatories

1. Tampa Electric objects to Interrogatory No. 31 on the ground that the information requested is confidential proprietary business information the public disclosure of which could harm the competitive interest of Tampa Electric's affiliates. FIPUG has not disclosed who its members are or whether one or more of its members could gain a competitive advantage over one or more of Tampa Electric's affiliates by being supplied the information requested.

WHEREFORE, Tampa Electric submits the foregoing as its Objection to FIPUG's Second Set of Interrogatories No. 31.

DATED this 2nd day of July, 2001.

Respectfully submitted,



LEE L. WILLIS
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Ausley & McMullen
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(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Objection to FIPUG's Second Set of Interrogatories (No. 31), filed on behalf of Tampa Electric Company, has been served by hand delivery (*) or U. S. Mail on this 2nd day of July, 2001 to the following:

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