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PLEASE REPLY TO:

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August 11, 2003

VIA HAND DELIVERY

Blanca S. Bayo, Director
Division of Records and Reporting
Betty Easley Conference Center
4075 Esplanade Way
Tallahassee, Florida 32399-0870

RECEIVED FPSC
AUG 11 PM 4:00
COMMISSION
CLERK

Re: Docket No.: 020898-EQ

Dear Ms. Bayo:

On behalf of Cargill Fertilizer, Inc. enclosed for filing and distribution are the original and 15 copies of the following:

- ▶ Cargill Fertilizer, Inc.'s Objections to the First Request for Admissions (Nos. 1 - 8) of Tampa Electric Company;
- 07357-03 ▶ Cargill Fertilizer, Inc.'s Objections to the First Set of Interrogatories (Nos. 1 - 22) of Tampa Electric Company; and
- 07358-03 ▶ Cargill Fertilizer, Inc.'s Objections to the First Request for the Production of Documents (Nos. 1 - 14) of Tampa Electric Company.

Please acknowledge receipt of the above on the extra copy of each and return the stamped copy to me. Thank you for your assistance.

Sincerely,

Vicki Gordon Kaufman
Vicki Gordon Kaufman

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AUG 11 2003

VGK/bae
Enclosures

DOCUMENT NUMBER-DATE

McWHIRTER, REEVES, MCGLOTHLIN, DAVIDSON, KAUFMAN & ARNOLD, P.A. 7356 AUG 11 03

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Application of Cargill Fertilizer, Inc.
to engage in self-service wheeling of waste
heat cogenerated power to, from and
between points within Tampa Electric
Company's service area.

Docket No. 020898-EQ

Filed: August 11, 2003

**CARGILL FERTILIZER, INC.'S OBJECTIONS TO THE FIRST REQUEST FOR
ADMISSIONS (NOS. 1 – 8) OF TAMPA ELECTRIC COMPANY**

Pursuant to Rule 1.370, Florida Rules of Civil Procedure, and Rule 28-106.206, Florida Administrative Code, Cargill Fertilizer, Inc. (Cargill), files its objections to the First Request for Admissions (Nos. 1 – 8) served by Tampa Electric Company (TECo) on Cargill.

The Objections stated herein are preliminary in nature and are made at this time for the purpose of complying with the ten-day requirement of Order No. PSC-03-0866-PCO-EQ, issued in this docket on July 24, 2003, by the Florida Public Service Commission (the Commission) in the above-referenced docket. Should additional grounds for objection be discovered as Cargill prepares its Responses to the above-referenced set of requests, Cargill reserves the right to supplement, revise, or modify its objections at the time that it serves its Responses. Moreover, should Cargill determine that a Protective Order is necessary with respect to any of the material requested, Cargill reserves the right to file a motion with the Commission seeking such an order at the time that it serves its Responses.

General Objections

Cargill makes the following General Objections to TECo's First Request for Admissions, which will be incorporated by reference into Cargill's Responses when its Responses are served.

1. Cargill objects to each and every request for admission to the extent that such request calls for information that is exempt from discovery by virtue of the attorney/client privilege, work

product privilege, or other applicable privilege or protection provided by law, whether such privilege or protection appears at the time response is first made to these requests for admissions or is later determined to be applicable based on the discovery of documents, investigation, or analysis.

2. Cargill objects to each and every request for admission insofar as the request is vague, ambiguous, overly broad, and imprecise or uses terms that are subject to multiple interpretations but are not properly defined or explained.

3. Cargill objects to any request for admission that calls for confidential proprietary business information and/or the compilation of the information that is considered confidential proprietary business information, including “trade secrets” which are privileged pursuant to Section 90.506, Florida Statutes.

4. Cargill objects to any request for admission that calls for the creation of information as opposed to the reporting of presently existing information or that purports to expand Cargill’s obligations under the Florida Rules of Civil Procedure or Florida Law.

5. Cargill objects to each and every request insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action.

Vicki Gordon-Kaufman

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Attorneys for Cargill Fertilizer, Inc.

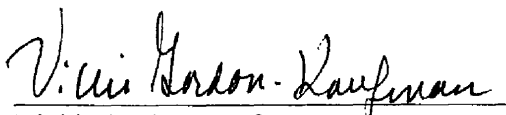
CERTIFICATE OF SERVICE

I HERBY CERTIFY that a true and correct copy of the foregoing Cargill Fertilizer, Inc.'s Objections to the First Request for Admissions (Nos. 1 – 8) of Tampa Electric Company has been furnished by (*) hand delivery or U.S. Mail on this 11th day of August, 2003 to the following:

(*) Rosanne Gervasi
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399

(*) James D. Beasley
Ausley & McMullen
227 South Calhoun Street
Post Office Box 391
Tallahassee, Florida 32302

Harry W. Long, Jr.
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601


Vicki Gordon Kaufman