

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition By Cargill Fertilizer, Inc.) Docket No. 020898-EQ
For permanent approval of self-service wheeling)
to, from and between points within Tampa Electric) Filed: August 18, 2003
Company's service territory)

**TAMPA ELECTRIC COMPANY'S MOTION TO COMPEL
RESPONSES TO REQUESTS FOR ADMISSIONS (NOS. 1-8)**

Pursuant to Rule 1.380, Florida Rules of Civil Procedure, and Rule 28-106.206, Florida Administrative Code, Tampa Electric Company ("Tampa Electric" or "Company") hereby requests that this Commission issue an order directing Cargill Fertilizer, Inc. ("Cargill") to produce to Tampa Electric those admissions that are responsive to Tampa Electric's First Request For Admissions (Nos. 1-8) ("Admissions") and says:

1. On August 11, 2003, Cargill filed general objections to Tampa Electric's Documents Requests without stating any specific objection to any Document Request.
2. Tampa Electric is in need of the information requested in order to prepare testimony and otherwise prepare itself for hearing.
3. Cargill has put forth no valid legal ground for not providing the requested documents.
4. Since Cargill has made no specific objections to Tampa Electric's First Request For Admissions and has not tied its General Objections to any particular Admission request, Tampa Electric

DOCUMENT NUMBER DATE

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submits that Cargill has, in effect, made no objection to Tampa Electric's Request For Admissions. Therefore Tampa Electric request that Cargill be ordered to respond fully to Request For Admissions Nos. 1-8.

5. Counsel for Tampa Electric has attempted to confer with counsel for Cargill regarding this Motion, but was unable to make contact.

WHEREFORE, Tampa Electric requests an order compelling Cargill to fully respond to Tampa Electric Request For Admissions Nos. 1-8 or, in the alternative, an order dismissing Cargill's Petition.

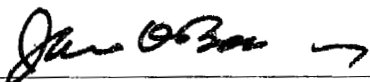
DATED this 18th day of August, 2003.

Respectfully Submitted,

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And

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By:  _____

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Motion, filed on behalf of Tampa Electric Company, has been served by hand delivery (*) or U.S. Mail on this 18th day of August, 2003 to the following:

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