## AUSLEY & MCMULLEN

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TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

October 4, 2006

### HAND DELIVERED

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

Re:

Environmental Cost Recovery Clause

FPSC Docket No. 060007-EI

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and one copy of Tampa Electric Company's Answer to First Request for Production of Documents (No. 1) of the Office of Public Counsel, propounded and served by U. S. Mail on September 14, 2006.

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,

James D. Beasley

JDB/pp Enclosure

cc:

All Parties of Record (w/enc.)

BOCUMENT NUMBER - CATE

09174 OCT-48

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost	)	
Recovery Clause.	)	DOCKET NO. 060007-EI
	)	FILED: October 4, 2006

# TAMPA ELECTRIC COMPANY'S ANSWER TO FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NO. 1) OF THE OFFICE OF PUBLIC COUNSEL

Tampa Electric Company has this date furnished by hand delivery to Patricia A. Christensen, Associate Public Counsel, Office of Public Counsel, c/o The Florida Legislature, 111 West Madison Street, Room 812, Tallahassee, FL 332399-1400, its Answers to Office of Public Counsel's First Request for Production of Documents (No. 1), propounded and served by U. S. Mail on September 14, 2006.

DATED this 4 day of October 2006.

Respectfully submitted,

LEE L. WILLIS
JAMES D. BEASLEY
Ausley & McMullen
Post Office Box 391
Tallahassee, Florida 32302
(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Answer to OPC's First

Request for Production of Documents, filed on behalf of Tampa Electric Company, has been

furnished by U. S. Mail or hand delivery (\*) on this <u></u>

day of October 2006 to the following:

Ms. Marlene K. Stern\*
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 301H – Gunter Building
Tallahassee, FL 32399-0850

Mr. Harold McLean Ms. Patricia Christensen Office of Public Counsel 111 West Madison Street – Suite 812 Tallahassee, FL 32399-1400

Mr. John W. McWhirter, Jr. McWhirter, Reeves & Davidson, P.A. 400 North Tampa Street, Suite 2450 Tampa, FL 33601-5126

Mr. Timothy J. Perry McWhirter, Reeves & Davidson, P.A. 117 South Gadsden Street Tallahassee, FL 32301

Mr. John T. Butler Squire, Sanders & Dempsey, L.L.P. 200 South Biscayne Boulevard Suite 4000 Miami, FL 33131-2398

Mr. Gary V. Perko Hopping Green & Sams, P.A. Post Office Box 6526 Tallahassee, FL 32314 Mr. James McGee Associate General Counsel Progress Energy Florida, Inc. Post Office Box 14042 St. Petersburg, FL 33733

Ms. Susan Ritenour Gulf Power Company One Energy Place Pensacola, FL 32520

Mr. Jeffrey A. Stone Mr. Russell A. Badders Beggs and Lane Post Office Box 12950 Pensacola, FL 32591-2950

Mr. R. Wade Litchfield Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420

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