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From:	Hayes, Annisha < AnnishaHayes@andrewskurth.com>
Sent:	Friday, July 19, 2013 4:34 PM
То:	Filings@psc.state.fl.us
Subject:	Docket No. 130040-EI - HUA's Request for Clarification of TECO 1st Request for
-	Production of Documents (Nos. 1-8)
Attachments:	HUA's Request for Clarification.pdf

Electronic Filing

a. Person responsible for this electronic filing:

Kenneth L. Wiseman Andrews Kurth LLP 1350 I Street, NW Suite 1100 Washington, DC 20005 202-662-2715 (phone) 202-662-2739 (fax)

- b. Docket No. 130040-EI.
- c. Document being filed on behalf of WCF Hospital Utility Alliance (HUA).
- d. There are a total of 4 pages.
- e. The document attached for electronic filing is HUA's Request for Clarification of TECO's 1st Request for Production of Documents (Nos. 1-8).

(See attached HUA's Request for Clarification.pdf)

Thank you for your attention and cooperation to this request.

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Tampa Electric Company

§

Docket No.: 130040-EI

Dated: July 19, 2013

WCF HOSPITAL UTILITY ALLIANCE'S REQUEST FOR CLARIFICATION OF TAMPA ELECTRIC'S FIRST REQUEST PRODUCTION OF DOCUMENTS TO WCF HOSPITAL UTILITY ALLIANCE (NOS. 1-8)

Pursuant to the Order Establishing Procedure,¹ the WCF Hospital Utility Alliance

("HUA") requests clarification of Production of Documents ("POD") No. 2 set forth in Tampa

Electric Company's ("Tampa Electric") First Request for Production of Documents to HUA

("First Set of PODs") dated July 9, 2013 as follows:

1. HUA seeks clarification as to the information Tampa Electric is seeking in POD No. 2. This request could be broadly interpreted to request all communications between HUA and any Party in this proceeding, including travel plans to attend hearings. Accordingly, please clarify what specifically Tampa Electric seeks to obtain from HUA with regards to this request.

In order to facilitate timely responses to Tampa Electric's First Set of PODs, HUA asks

that Tampa Electric provide the requested clarification to POD No. 2 within five (5) calendar

days of the date of this request.

WHEREFORE, HUA submits the foregoing requests for clarification of Tampa Electric

Production of Documents Request No. 2.

¹ Order No. PSC-13-0150-PCO-EI.

Respectfully submitted,

/s/ Kenneth L. Wiseman

Kenneth L. Wiseman Mark F. Sundback Lisa M. Purdy William M. Rappolt Blake R. Urban Andrews Kurth LLP 1350 I Street, NW Suite 1100 Washington, DC 20005

Qualified Representatives for the WCF Hospital Utility Alliance

DATED: July 19, 2013

CERTIFICATE OF SERVICE DOCKET NO. 130040-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by

electronic mail, U.S. Mail, or Federal Express, this 19th day of July, 2013, to the following:

Tampa Electric Company

Gordon L. Gillette Paula K. Brown P.O. Box 111 Tampa, FL 33601-0111 Phone: (813) 228-1444 Fax: (813) 228-1770 Email: <u>Regdept@tecoenergy.com</u>

Office of Public Counsel

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Florida Public Service Commission

Office of the General Counsel Martha Barrera Martha Brown Suzanne Brownless 2450 Shumard Oak Boulevard Tallahassee, FL 32399

Florida Retail Federation

100 East Jefferson Street Tallahassee, FL 32301 Phone: (850) 222-4082 Fax: (850) 226-4082

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Jon C. Moyle, Jr. c/o Moyle Law Firm 118 North Gadsden Street Tallahassee, FL 32301 Phone: (850) 681-3828 Fax: (850) 681-8788 Email: jmoyle@kagmlaw.com

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<u>/s/ Kenneth L. Wiseman</u> Kenneth L. Wiseman