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July 24, 2013

HAND DELIVERED

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COMMISSION  
CLERK

Ms. Ann Cole, Director  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Petition for Rate Increase by Tampa Electric Company  
FPSC Docket No. 130040-EI

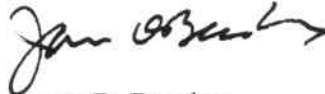
Dear Ms. Cole:

Enclosed for filing in the above matter are the original and fifteen (15) copies of Tampa Electric Company's Specific Objections to WCF Hospital Utility Alliance's Third Set of Document Requests (Nos. 156-158 and 159) and WCF Hospital Utility Alliance's Fourth Set of Document Requests (Nos. 167, Part (a) to Tampa Electric Company.

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.)

COM	_____
AFD	1
APA	1
ECO	12
ENG	_____
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TEL	_____
CLK	_____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase )  
by Tampa Electric Company. )  
\_\_\_\_\_ )

DOCKET NO. 130040-EI

FILED: July 24, 2013

**TAMPA ELECTRIC COMPANY'S SPECIFIC OBJECTIONS TO  
WCF HOSPITAL UTILITY ALLIANCE'S THIRD SET OF DOCUMENT  
REQUESTS (NOS. 156-158 AND 159) AND WCF HOSPITAL UTILITY  
ALLIANCE'S FOURTH SET OF DOCUMENT REQUESTS  
(NO. 167, PART (a) TO TAMPA ELECTRIC COMPANY)**

Pursuant to Rule 28-106.205, Florida Administrative Code and Rule 1.350, Florida Rules of Civil Procedure, Tampa Electric Company ("Tampa Electric" or "the company") makes the following specific objections to certain of WCF Hospital Utility Alliance's ("HUA's") Third and Fourth Sets of Document Requests to Tampa Electric Company, filed July 22, 2013:

1. Tampa Electric objects to PODs Nos. 156 through 158 which reads as follows:
  156. Regarding Hornick at 20:10-14. Please produce all documents dated January 1, 2007 or later that were developed in connection with the development of 5-year construction budgets and which identify near-term projects necessary to achieve or maintain safety and environmental compliance, while managing fuel and purchased power.
  157. Regarding Hornick at 20:10-14. Please produce all documents dated January 1, 2007 or later that discuss the near-term projects identified to achieve or maintain safety or environment compliance, while managing fuel and purchased power.
  158. Regarding Hornick at 20:14-18. Please produce all documents dated January 1, 2007 or later that discuss the capital projects in the 5-year plan referred to in referenced testimony.

**Basis for Objection:** Tampa Electric objects to PODs 156-158 as those requests are for all documents dated January 1, 2007 or later that were developed in connection with the 5-year construction budgets or near-term projects. While the company does

have the listings of the various projects included in the 5-year plans, there is an extensive amount of documents associated with each individual project contained within those annual plans and it would take countless hours for Tampa Electric to go through all of its annual plans and extract all documents related to individual projects. This would cause Tampa Electric a costly undue burden that would far outweigh any probative value that could be derived from the documents in question.

2. Tampa Electric objects to POD No. 159 which reads as follows:

159. Regarding Hornick at 21:10-13. Please produce all documents that discuss the "desired performance" of the projects that Tampa Electric anticipates constructing through 2017.

**Basis for Objection:** This POD, likewise, requests the extraction and assembly of countless documents that discuss the desired performance of the projects that Tampa Electric anticipates constructing through 2017. There are over 400 projects that the company has planned for construction through 2017 and producing documents on the desired performance for each one of those projects would be an excessive and unduly burdensome task far outweighing any probative value that could be derived from the documents in question.

3. Tampa Electric objects to POD No. 167, Part (a), which read as follows:

167(a). Copies of all testimonies given in any proceeding, whether before the Florida Public Service Commission or otherwise, including live and prepared testimonies and affidavits, and provide any publications or presentations to which the witness contributed.

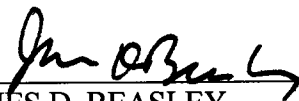
**Basis for Objection:** This request, likewise, is excessive and unduly burdensome. Providing all presentations, testimonies, including live and prepared

testimonies and affidavits as well as publications or presentations to which the witness contributed would be an unfathomable task covering literally entire careers worth of endeavor. Consequently, subpart (a) of this POD would impose a costly and unduly burdensome task on Tampa Electric and its witnesses which would far outweigh any probative value of the documents in question.

WHEREFORE, Tampa Electric submits the foregoing specific objections to HUA's Requests for Production of Documents Nos. 156-158, 159 and 167(a).

DATED this 24<sup>th</sup> day of July 2013.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Specific Objections to HUA's Third Set of Document Requests (Nos. 156-158 and 159) and HUA's Fourth Set of Documents Request (No. 167, Part (a)), filed on behalf of Tampa Electric Company, was served by email, overnight mail or hand delivery(\*) on this 24<sup>th</sup> day of July, 2013 to the following:

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