

**Shawna Senko**

---

**To:** Dorothy Menasco  
**Cc:** Hong Wang  
**Subject:** FW: Dtk. 140001-EI  
**Attachments:** Dkt. 140001 Rsp OPC 1st POD.pdf

There is an e-filing in the inbox right at 5:00 p.m., I converted it and placed it in OTC.

Shawna Senko  
Florida Public Service Commission  
Office of Commission Clerk  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850  
850-413-6770

---

**From:** Pat Pottle [<mailto:ppottle@ausley.com>]  
**Sent:** Monday, May 12, 2014 4:59 PM  
**To:** [Filings@psc.state.fl.us](mailto:Filings@psc.state.fl.us)  
**Subject:** Dtk. 140001-EI

Electronic filing

a. Person responsible for this electronic filing:

James D. Beasley  
Ausley & McMullen  
P.O. Box 391 (32302)  
227 S. Calhoun Street  
Tallahassee, FL 32301  
850 425-5485  
[jbeasley@ausley.com](mailto:jbeasley@ausley.com)

b. Docket No. 140001-EI; Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor

c. The document is being filed on behalf of Tampa Electric Company

d. There are a total of 4 pages, including cover letter

e. The document attached for electronic filing is a cover letter and TECO's Response to the Citizens of the State of Florida's First Request for Production of Documents (Nos. 1-2). Please substitute with the earlier unsigned same document filed with the Clerk's Office today at 3:22 P.M.

---

# AUSLEY & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

123 SOUTH CALHOUN STREET  
P.O. BOX 391 (ZIP 32302)  
TALLAHASSEE, FLORIDA 32301  
(850) 224-9115 FAX (850) 222-7560

May 12, 2014

HAND DELIVERED

Ms. Carlotta S. Stauffer  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Fuel and Purchased Power Cost Recovery Clause with Generating  
Performance Incentive Factor; FPSC Docket No. 140001-EI

Dear Ms. Stauffer:

Enclosed for filing in the above docket are the original and one copy of Tampa Electric Company's Response to the Citizens of the State of Florida's First Request for Production of Documents (Nos. 1-2), propounded and served by electronic mail on April 11, 2014.

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.)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased )  
Power Cost Recovery Clause )  
and Generating Performance )  
Incentive Factor. )  
\_\_\_\_\_ )

DOCKET NO. 140001-EI

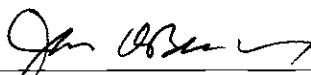
FILED: May 12, 2014

**TAMPA ELECTRIC COMPANY'S RESPONSE TO THE  
CITIZENS OF THE STATE OF FLORIDA'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-2)**

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, Tampa Electric Company ("Tampa Electric" or "the company") files this its Response to the Citizens of the State of Florida's First Request for Production of Documents (Nos. 1-2) propounded and served on April 11, 2014. The answers will be produced for inspection at the office of Ausley & McMullen at a date and time mutually arranged with OPC.

DATED this 12<sup>th</sup> day of May 2014.

Respectfully submitted,

  
\_\_\_\_\_  
JAMES D. BEASLEY  
J. JEFFRY WAHLEN  
ASHLEY M. DANIELS  
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 Response, filed on behalf of Tampa Electric Company, has been served by hand delivery (\*) or electronic mail on this 12<sup>th</sup> day of May 2014, to the following:

Ms. Martha F. Barrera  
Ms. Theresa Farley  
Ms. Julia Gilcher\*  
Senior Attorney  
Office of the General Counsel  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[mbarrera@psc.state.fl.us](mailto:mbarrera@psc.state.fl.us)  
[tefarley@psc.state.fl.us](mailto:tefarley@psc.state.fl.us)  
[jgilcher@psc.state.fl.us](mailto:jgilcher@psc.state.fl.us)

Mr. John T. Burnett  
Ms. Dianne M. Triplett  
Duke Energy Florida, Inc.  
Post Office Box 14042  
St. Petersburg, FL 33733  
[John.burnett@duke-energy.com](mailto:John.burnett@duke-energy.com)  
[Dianne.triplett@duke-energy.com](mailto:Dianne.triplett@duke-energy.com)

Mr. Matthew R. Bernier  
Mr. Paul Lewis, Jr.  
Duke Energy Florida, Inc.  
106 East College Avenue  
Suite 800  
Tallahassee, FL 32301-7740  
[matthew.bernier@duke-energy.com](mailto:matthew.bernier@duke-energy.com)  
[paul.lewisjr@duke-energy.com](mailto:paul.lewisjr@duke-energy.com)

Mr. Jon C Moyle, Jr.  
Moyle Law Firm  
118 N. Gadsden Street  
Tallahassee, FL 32301  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)

Ms. Patricia A. Christensen\*  
Associate Public Counsel  
Office of Public Counsel  
111 West Madison Street – Room 812  
Tallahassee, FL 32399-1400  
[christensen.patty@leg.state.fl.us](mailto:christensen.patty@leg.state.fl.us)

Mr. Robert L. McGee, Jr.  
Regulatory and Pricing Manager  
Gulf Power Company  
One Energy Place  
Pensacola, FL 32520-0780  
[rlmcgee@southernco.com](mailto:rlmcgee@southernco.com)

Ms. Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 S. Monroe St., Suite 601  
Tallahassee, FL 32301  
[bkeating@gunster.com](mailto:bkeating@gunster.com)

Ms. Cheryl Martin  
Director/Regulatory Affairs  
Florida Public Utilities Company  
1641 Worthington Road, Suite 220  
West Palm Beach, FL 33409  
[Cheryl\\_Martin@fpuc.com](mailto:Cheryl_Martin@fpuc.com)

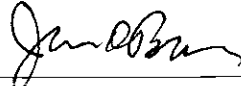
Mr. John T. Butler  
Assistant General Counsel - Regulatory  
Florida Power & Light Company  
700 Universe Boulevard  
Juno Beach, FL 33408-0420  
[john.butler@fpl.com](mailto:john.butler@fpl.com)

Mr. Robert Scheffel Wright  
Mr. John T. LaVia, III  
Gardner, Bist, Wiener, Wadsworth,  
Bowden, Bush, Dee, LaVia & Wright, P.A.  
1300 Thomaswood Drive  
Tallahassee, FL 32308  
[Schef@gbwlegal.com](mailto:Schef@gbwlegal.com)  
[Jlavia@gbwlegal.com](mailto:Jlavia@gbwlegal.com)

Mr. Jeffrey A. Stone  
Mr. Russell A. Badders  
Mr. Steven R. Griffin  
Beggs & Lane  
Post Office Box 12950  
Pensacola, FL 32591-2950  
[jas@beggslane.com](mailto:jas@beggslane.com)  
[rab@beggslane.com](mailto:rab@beggslane.com)  
[srg@beggslane.com](mailto:srg@beggslane.com)

Mr. Kenneth Hoffman  
Vice President, Regulatory Relations  
Florida Power & Light Company  
215 South Monroe Street, Suite 810  
Tallahassee, FL 32301-1859  
[ken.hoffman@fpl.com](mailto:ken.hoffman@fpl.com)

Mr. James W. Brew  
Mr. F. Alvin Taylor  
Brickfield, Burchette, Ritts & Stone, P.C.  
1025 Thomas Jefferson Street, NW  
Eighth Floor, West Tower  
Washington, D.C. 20007-5201  
[jbrew@bbrslaw.com](mailto:jbrew@bbrslaw.com)  
[ataylor@bbrslaw.com](mailto:ataylor@bbrslaw.com)



---

ATTORNEY