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ORIGINAL
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May 17, 1996

HAND DELIVERY

PLEASE REFER TO:

Tallahassee

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Prudency Review to Determine Regulatory
Treatment of Tampa Electric Company's
Polk Unit; FPSC Docket No. 960409-EI

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Motion for Temporary Protective Order.

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

- ACK 1
- AFA 4
- APP 1
- CAF
- GMU JDB/pp
- CIR Enclosures
- EPG *Eudley*
- LR 1
- LR 5
- OC
- RCR
- SEC 1
- WAS
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All Parties of Record (w/encls.)

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Date Rec'd: 5/17/96

DOCUMENT NUMBER DATE
05526 MAY 17 96
FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Prudency Review to Determine)
Regulatory Treatment of Tampa Electric)
Company's Polk Unit.)

DOCKET NO. 960409-EI

FILED: May 17, 1996

**TAMPA ELECTRIC COMPANY'S
MOTION FOR TEMPORARY PROTECTIVE ORDER**

Tampa Electric Company ("Tampa Electric" or the "company"), pursuant to Rule 25-22.006(5)(c), Florida Administrative Code, hereby moves the Commission to enter a temporary protective order relative to certain information contained in documents to be produced by Tampa Electric as a supplemental response to Office of Public Counsel's ("OPC's") First Request for Production of Documents Nos. 1 through 24, and says:

1. On April 10, 1996 OPC served on Tampa Electric its First Request for Production of Documents (Nos. 1-24) in the above docket. A copy of OPC's Requests Nos. 1-24 is attached hereto as Exhibit "A". On April 22, 1996 Tampa Electric filed its Objections, Motion for Protective Order and Written Response to OPC's First Request for Production of Documents. Tampa Electric timely produced for inspection by OPC those documents it agreed to produce in response to Requests Nos. 1 - 24.

2. OPC and counsel for Tampa Electric later met to discuss OPC's desire to inspect additional documents that might be responsive to OPC's Requests Nos. 1 - 24. Subsequent to that meeting Tampa Electric has focused its efforts on the task of assembling the requested additional documents on an expedited

DOCUMENT NUMBER-DATE
05526 MAY 17 1996
FPSC-RECORDS/REPORTING

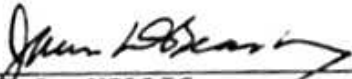
basis. As a result, Tampa Electric is still evaluating which of the additional documents may need confidential classification to protect the interests of Tampa Electric and its customers. In addition, Tampa Electric does not know at this time whether OPC will request that copies be made of any of the additional documents. Rather than delaying the production of these additional documents, Tampa Electric is requesting a temporary protective order exempting from public disclosure the additional documents the company is producing for OPC.

3. Once it is determined whether OPC intends to use any of the additional documents in this proceeding, Tampa Electric will file a formal and timely request for confidential classification, if necessary, pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, to the extent that any copies to be furnished to OPC are determined to contain confidential information which is in need of protection from public disclosure.

WHEREFORE, Tampa Electric Company moves the Commission for entry of a Temporary Protective Order as described above.

DATED this 17th day of May, 1996.

Respectfully submitted,



LEE L. WILLIS
JAMES D. BEASLEY
Macfarlane Ausley Ferguson & McMullen
Post Office Box 391
Tallahassee, Florida 32302
(904) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

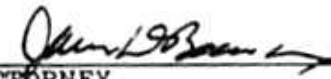
I HEREBY CERTIFY that a true copy of the foregoing Motion for Temporary Protective Order, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (*) on this 17th day of May, 1996 to the following:

Mr. Robert V. Elias*
Staff Counsel
Division of Legal Services
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Mr. Joseph A. McGlothlin
Ms. Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas
117 S. Gadsden Street
Tallahassee, FL 32301

Mr. Jack Shreve
Mr. John Roger Howe
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street - #812
Tallahassee, FL 32399-1400

Mr. John W. McWhirter, Jr.
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas
100 North Tampa Street
Suite 2800
Tampa, FL 33602



ATTORNEY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Prudence Review to Determine)
Regulatory Treatment of Tampa Electric) DOCKET NO. 960409-EI
Company's Polk Unit) FILED: April 10, 1996

**PUBLIC COUNSEL'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
TO TAMPA ELECTRIC COMPANY (NOS. 1 - 24)**

The Citizens of the State of Florida, through the Office of Public Counsel, request Tampa Electric Company to produce, pursuant to Section 350.611(1), Florida Statutes, and Rule 1.350, Florida Rules of Civil Procedure, the following documents at the Office of Public Counsel, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400, on or before the 3rd day of May, 1996, at 5:00 p.m. for the purpose of inspection and copying.

DEFINITIONS

1. Tampa Electric Company, TECO, the utility, or company, means the utility and any other party which directly or indirectly controls, or is controlled by, or is under common control with the utility. "Control" means the possession, direct or indirect, of the power to direct or cause the direction of the management and policies of a specified party whether through ownership, contract, or otherwise.
2. "document" or "documents" means any written, recorded, filmed or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, memoranda, notes, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations,

workpapers, and notes, any of which is in your possession, custody or control.

3. "And" as well as "or" includes disjunctive and/or conjunctive as necessary to include within the scope of this document request interrogatories any information which might not otherwise be included.
4. As used herein Tampa Electric Company includes the utility, together with its affiliates, directors, officers, employees, consultants, agents, representatives, attorneys, and all other persons or entities acting on its behalf.

DOCUMENTS REQUESTED

Please provide the following documents:

1. Provide a copy of the Teco Energy ,Inc.'s, Tampa Electric Company's and their subsidiaries'/affiliates' internal accounting manuals, directives, policies and procedures.
2. Provide a copy of the chart of accounts for Teco Energy ,Inc., Tampa Electric Company and their subsidiaries/affiliates.
3. Provide a copy of all budget instructions, assumptions, directives, manuals, policies and procedures, approval letters, time frames, and descriptions of budget procedures used in the budgetary process of Teco Energy, Inc., Tampa Electric Company and their subsidiaries/affiliates.
4. Provide all narrative and financial operating plans which describe the corporate goals and objectives for the years 1994 through 1999 for Teco Energy, Inc., Tampa Electric Company and their subsidiaries/affiliates.
5. For the years 1994, 1995, and 1996 provide a copy of all internal audit reports for Teco Energy ,Inc., Tampa Electric Company and their subsidiaries/affiliates.
6. For the years 1994, 1995, and 1996 provide a copy of all (short range and long range) strategic plans and reports for Teco Energy ,Inc., Tampa Electric Company and their subsidiaries/affiliates.
7. For the years 1994, 1995 and 1996 provide a copy of all annual, monthly, and weekly financial and operating reports (including budget variance reports) which Teco Energy ,Inc., Tampa Electric Company or their subsidiaries/affiliates

- provide to senior management of Teco Energy ,Inc. or Tampa Electric Company. Include all supporting details, workpapers, assumptions and explanations.
8. For the years 1994, 1995, and 1996 provide a copy of all in-house annual, monthly, weekly or special (separate) financial and operating reports (including budget variance reports) provided to or produced by Mr. Gordan L. Gillette, Mr. Keith S. Surgenor or Mr. Lester L. Lefler. Include all supporting details, workpapers, assumptions and explanations.
 9. For the years 1990 through 1999 provide a copy of all construction, expense, revenue, and capital structure budgets for Teco Energy, Inc., Tampa Electric Company and their subsidiaries/affiliates. Include all supporting details, workpapers, assumptions and explanations. This also includes the long range or five year budget.
 10. For the years 1990 through 1999 provide a copy of all construction, expense, revenue and capital structure budget Summary Report(s) by month and by year for Teco Energy, Inc., Tampa Electric Company and their subsidiaries/affiliates. Include all supporting details, workpapers, assumptions and explanations.
 11. For the years 1990 through 1996, provide the Project Change Revisions (PCRs) associated with the acquisition and improvement of land for, and construction of, the Polk Power Station, including Polk Unit 1.
 12. For the years 1994, 1995 and 1996 provide a copy of all variance reports and variance explanations, summaries of variance reports and variance explanations, used to monitor and control the company's budgets (construction, expense, revenues and capital structure budgets).
 13. For the years 1994, 1995, and 1996 provide a copy of the budgeted financial statements presented to the Board of Directors of Teco Energy ,Inc., Tampa Electric Company and their subsidiaries/affiliates. In addition provide the final budget as approved by the Board of Directors.
 14. For the years 1994, 1995, and 1996 provide a copy of all monthly, quarterly, and annual presentations to the Board of Directors for Teco Energy ,Inc., Tampa Electric Company and their subsidiaries/affiliates.
 15. For the years 1994, 1995, and 1996 provide a copy of all management and performance audits for Teco Energy, Inc., Tampa Electric Company and their subsidiaries/affiliates. This includes, but is not limited to, all internal memoranda, reports, or studies which address financial performance.

16. For the years 1994, 1995, and 1996 provide a copy of all corporate performance awards, bonus and incentive compensation plans or any other non-salary compensation plans (including the executive investment plan) in use for Teco Energy ,Inc., Tampa Electric Company and their subsidiaries/affiliates.
17. For the years 1994, 1995, and 1996 provide a copy of all State and Federal Income Tax returns for Teco Energy ,Inc., Tampa Electric Company and their subsidiaries/affiliates, including a complete copy of any and all schedules, workpapers, and consolidating schedules.
18. For the years 1994, 1995 and 1996 provide a copy of all reports and documents Teco Energy ,Inc., Tampa Electric Company or their subsidiaries/affiliates file with the Securities and Exchange Commission, including but not limited to Forms 10K, 10Q, 8K, U-3A-2, Stockholder's Annual Report, Proxy Statements, and the four most recent Bond Prospectus.
19. For the years 1994, 1995, and 1996 provide a copy of all reports and documents which show how intercompany costs are charged or allocated between Tampa Electric Company and its parent or any of its affiliates. In addition, for the same years provide copies of all documents that summarize or show the dollar amounts of intercompany costs charged or allocated between Tampa Electric Company and its parent or any of its affiliates.
20. For Teco Energy ,Inc., Tampa Electric Company and their subsidiaries/affiliates, provide a copy (list) of each entity's monthly recurring standard general journal entries, along with a copy (list) of the year end entries for 1994, 1995 and 1996.
21. For the years 1994, 1995 and 1996 provide a copy of the monthly general journal entries for Teco Energy ,Inc., Tampa Electric Company and their subsidiaries/affiliates. This includes all vouchers, detailed workpapers, and documents supporting the recording of these journal entries.
22. Provide all documents showing the derivation of Teco Energy,Inc.'s, Tampa Electric Company's and their subsidiaries'/affiliates' consolidated financial statements for the years 1994, 1995, and 1996. These documents should include, but are not limited to, the workpapers showing the trial balance or balance sheet and income statements of each subsidiary and the applicable consolidating adjusting entries and all related notes, adjustments and eliminations used to calculate these consolidated financial statements.

23. For the years 1994, 1995, and 1996 provide a copy of all minutes of the Board of Directors for Teco Energy ,Inc., Tampa Electric Company and their subsidiaries/affiliates.
24. For the years 1994, 1995, and 1996 provide copies of the minutes to all Managers Committee Meetings or Executive Committee meetings held by Teco Energy ,Inc., Tampa Electric Company and their subsidiaries/affiliates

CERTIFICATE OF SERVICE
DOCKET NO. 960409-EI


I HEREBY CERTIFY that a correct copy of the foregoing PUBLIC COUNSEL'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1 - 24) has been furnished by U.S. Mail or *hand-delivery to the following persons on this 10th day of April, 1996.

LEE L. WILLIS, ESQUIRE*
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Tampa, FL 33602



John Roger Howe
Deputy Public Counsel