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July 2, 1997

HAND DELIVERED

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

Re: Determination of appropriate cost allocation and regulatory treatment of total revenues associated with wholesale sales to Florida Municipal Power Agency and City of Lakeland by Tampa Electric Company;
FPSC Docket No. 970171-EU

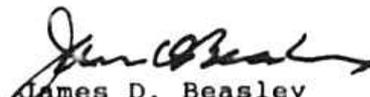
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Motion for 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 _____
AFA 2/1/97
APP _____
CAF _____
CMU JDB/pp
CTR Enclosures
EAG cc: All Parties of Record (w/enc.)
LEG 1
LIT 3
OFC _____
REC _____
SEC _____
WAS _____
OTH _____

RECEIVED & FILED

OFFICE OF RECORDS

06715 JUL -2 97

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of appropriate)
cost allocation and regulatory)
treatment of total revenues associated)
with wholesale sales to Florida)
Municipal Power Agency and City of)
Lakeland by Tampa Electric Company.)
_____)

DOCKET NO. 970171-EU
FILED: July 2, 1997

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

1. On May 12, 1997 Staff filed and served their Amended First Set of Interrogatories. On May 22, 1997 Tampa Electric filed its response and objections to Staff's discovery, including a specific objection to amended Interrogatory No. 5 asking the company to provide the monthly incremental fuel costs separated by f.o.b. mine price, transportation cost and net profit to affiliates of Tampa Electric for the FMPA and Lakeland sales from the inception of the sales through February 28, 1997.

2. During the June 11, 1997 hearing in this docket Chairman Johnson granted Staff's motion to compel Tampa Electric to answer amended Interrogatory No. 5 as a Late-Filed Exhibit No. 6. (Tr. 190)

3. Tampa Electric is simultaneously filing under a separate cover letter its confidential answer to amended Interrogatory No. 5 along with a justification for treating the information contained therein as proprietary confidential business information.

4. Under Commission Rule 25-22.006(6)(b), this request for a protective order exempts the response to amended Interrogatory No. 5 from the Public Records Law.

DOCUMENT FILED DATE

06715 JUL-25

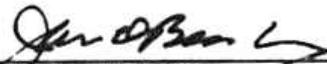
5. Tampa Electric also requests that the Florida Industrial Power Users Group be afforded access to the company's answer to amended Interrogatory No. 5 only after such time as an appropriate confidentiality agreement is executed on behalf of FIPUG. The undersigned is this date providing counsel for FIPUG with a proposed confidentiality agreement.

6. Also, pursuant to Fla. Admin. Code Rule 25-22.006(6)(d), Tampa Electric's confidential response to amended Interrogatory No. 5 should be returned to the company no later than 60 days after the final order in this docket. Such return is also contemplated in the Order Establishing Procedure and in the Prehearing Order in this proceeding.

WHEREFORE, Tampa Electric Company requests the entry of a protective order containing the above protection relative to the company's response to Staff's amended Interrogatory No. 5 (hearing Late-Filed Exhibit No. 6).

DATED this 2nd day of July, 1997.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Motion for Protective Order, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand deliver (*) on this 2nd day of July 1997 to the following:

Ms. Leslie Paugh*
Staff Counsel
Division of Legal Services
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Mr. Gary Lawrence
City of Lakeland
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Lakeland, FL 33801-5079

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ATTORNEY