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July 20, 1998

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

Re: Petition by Tampa Electric Company for Approval of Cost Recovery for a new Environmental Program, the Big Bend Unit. 1 and 2 Flue Gas Desulfurization System, FPSC Docket No. 980693-EI

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of each of the following:

- 1 Tampa Electric Company's Written Response to Staff's First Request for Production of Documents (Nos. 1-35)
- 2 Tampa Electric Company's Written Response to FIPUG's First Request for Production of Documents (Nos. 1-6)

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

HDB/pp  
Enclosures

cc All Parties of Record (w/enc)

POP 1-35      POP 1-6  
DOCUMENT NUMBER-DATE    DOCUMENT NUMBER-DATE  
07615 JUL 20 88      07616 JUL 20 88

RECEIVED FPSC DIVISION OF RECORDS AND REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Petition by Tampa Electric )  
Company for Approval of Cost Recovery )  
for a new Environmental Program, the )  
Big Bend Units 1 and 2 Flue Gas )  
Desulfurization System. )  
\_\_\_\_\_ )

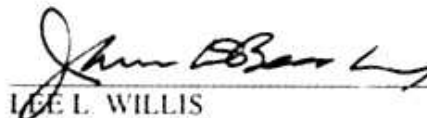
DOCKET NO. 980693-EI  
FILED July 20, 1998

**TAMPA ELECTRIC COMPANY'S  
WRITTEN RESPONSE TO FIPUG'S FIRST REQUEST  
FOR PRODUCTION OF DOCUMENTS (NOS. 1-6)**

Tampa Electric Company responds as follows to FIPUG's First Request for Production of Documents Nos. 1-6 by saying that Tampa Electric will produce for inspection documents responsive to FIPUG's First Request for Production of Documents Nos. 1-6 with the exception of any documents requested by the Staff of the Florida Public Service Commission with respect to which any objection remains outstanding and subject to FIPUG executing an appropriate nondisclosure agreement to protect the confidentiality of a very limited portion of the documents to be produced at the Staff's request under Tampa Electric's notice of intent to seek confidential classification.

DATED this 20<sup>th</sup> day of July, 1998.

Respectfully submitted,



LEE L. WILLIS  
JAMES D. BEASLEY  
Ausley & McMullen  
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(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

DOCUMENT NUMBER-DATE

07616 JUL 20 98

FPSD RECORDS/REPORTING

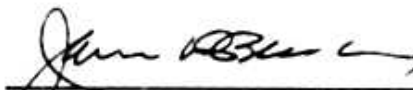
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Written Response, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (\*) on this 20<sup>th</sup> day of July, 1998 to the following:

Ms. Grace Jaye\*  
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, P A  
117 South Gadsden Street  
Tallahassee, FL 32301

Mr. John W. McWhirter, Jr.  
McWhirter, Reeves, McGlothlin,  
Davidson, Rief & Bakas, P.A.  
Post Office Box 3350  
Tampa, FL 33601

  
\_\_\_\_\_  
ATTORNEY

TLC980693Response to Staff's 1<sup>st</sup> RFP