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# ORIGINAL

February 7, 2000

HAND DELIVERED

RECEIVED-FPSC  
00 FEB - 7 AM 11:40  
RECORDS AND  
REPORTING

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 plan to bring generating units into compliance with Clean Air Act; FPSC Docket No. 992014-EI

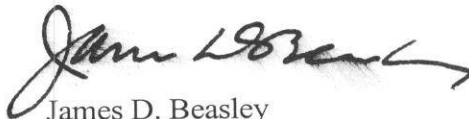
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Objection to Reliant Energy Power Generation, Inc.'s Request No. 4 of its First Request for Production of Documents to Tampa Electric Company (Nos. 1-10).

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

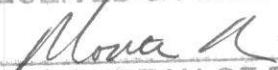
Thank you for your assistance in connection with this matter.

Sincerely,



James D. Beasley

RECEIVED & FILED

  
FPSC-BUREAU OF RECORDS

- AFA 1
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG 2
- MAS 5
- OPC \_\_\_\_\_
- RRR \_\_\_\_\_
- SEC 1
- VAW \_\_\_\_\_
- OTH \_\_\_\_\_

JDB/pp  
Enclosures

cc: All Parties of Record (w/enc.)

DOCUMENT NUMBER-DATE

01668 FEB-78

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Tampa Electric )  
Company for approval of plan to )  
bring generating units into )  
Compliance with Clean Air Act. )  
\_\_\_\_\_ )

DOCKET NO. 992014-EI

FILED: February 7, 2000

**TAMPA ELECTRIC COMPANY'S OBJECTION  
TO RELIANT ENERGY POWER GENERATION, INC.'S  
REQUEST NO. 4 OF ITS FIRST REQUEST FOR PRODUCTION  
OF DOCUMENTS TO TAMPA ELECTRIC COMPANY (NOS. 1-10)**

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to the Order Establishing Procedure issued January 14, 2000 in this proceeding, objects to Request No. 4 of Reliant Energy Power Generation, Inc.'s ("Reliant") Request No. 4 contained in Reliant's First Request for Production of Documents to Tampa Electric Company (Nos. 1-10) and, as grounds therefor, says:

1. Reliant's Document Request No. 4 asks Tampa Electric to provide copies of all communications between Tampa Electric and the major bond rating agencies during calendar years 1998, 1999 and 2000 to date. Tampa Electric objects to this request on the grounds that it calls for information that is not relevant to the subject matter of this proceeding nor is it likely to lead to the discovery of admissible evidence.

2. In addition, Tampa Electric objects because its communications with bond rating agencies are conducted on a confidential basis and include information that is proprietary and sensitive from a business planning and operations standpoint. Tampa Electric objects to providing Reliant with such information which might be used by Reliant to more effectively compete with Tampa Electric.

DOCUMENT NUMBER-DATE

01668 FEB-78

FPSC-RECORDS/REPORTING

3. Communications with rating agencies take place over a continuum with much of the information being supplied in verbal form. The sum total and effect of such communications would be more easily discerned by examining the rating agencies' reports pertaining to Tampa Electric. Such reports constitute the end result of the rating agencies' analysis of all information, including that supplied by Tampa Electric as well as that gleaned from other sources. Tampa Electric would be willing to provide Reliant with copies of the rating agencies' reports for the years in question in an effort to comply with Reliant's request but at the same time avoid disclosing proprietary confidential business information.

WHEREFORE, Tampa Electric submits the foregoing objection to Reliant's Request No. 4 in its First Request for Production of Documents (Nos. 1-10).

DATED this 7<sup>th</sup> day of February 2000.

Respectfully submitted,



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LEE L. WILLIS  
JAMES D. BEASLEY  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, FL 32302  
(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Objection, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (\*) on this 7<sup>th</sup> day of February 2000 to the following:


Mr. Robert V. Elias\*  
Ms. Grace A. Jaye\*  
Staff Counsel  
Division of Legal Services  
Florida Public Service Commission  
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\_\_\_\_\_  
ATTORNEY

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