

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Allied Universal Corporation and	)	DOCKET NO. 000061-EI
Chemical Formulators, Inc. against Tampa Electric	)	FILED: February 14, 2000
Company	)	
_____	)	

**TAMPA ELECTRIC COMPANY'S RESPONSE  
TO ALLIED/CFI'S MOTION FOR EXPEDITED  
RESPONSES TO DISCOVERY REQUESTS**

Tampa Electric Company ("Tampa Electric" or "the company") responds as follows to the Motion for Expedited Responses to Discovery Requests filed on February 7, 2000 on behalf of Allied Universal Corporation ("Allied") and Chemical Formulators, Inc. ("CFI"):

1. The information requested through discovery by Allied/CFI pertains to Contract Service Agreement ("CSA") negotiations by Tampa Electric with Allied/CFI and one of its competitors, Odyssey Manufacturing Company ("Odyssey"). Such information is confidential pursuant to Tampa Electric's Commission approved commercial/industrial service rider tariff and pursuant to confidentiality agreements with both Odyssey and Allied/CFI. As such, the information should not be supplied to Allied/CFI at all, much less on the unreasonably expedited time frame set forth in Allied/CFI's Motion to Expedite.

2. The need for confidential protection of the information in question is described in detail in Tampa Electric's Motion for Protective Order, also being filed this date, addressing all of Allied/CFI's discovery requests in this docket.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

WHEREFORE, Tampa Electric Company submits the foregoing as its response in opposition to Allied/CFI's Motion for Expedited Response to Discovery Requests.

DATED this 14th day of February, 2000.

Respectfully submitted,

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and



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing Objection and Motion for Protective Order, filed on behalf of Tampa Electric Company, has been furnished by hand delivery(\*) or U. S. Mail this 14th day of February 2000 to the following:

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ATTORNEY

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