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RECORDS AND REPORTING

February 28, 2000

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: Petition by Tampa Electric Company for approval of plan to bring generating units into compliance with Clean Air Act; FPSC Docket No. 992014-EI

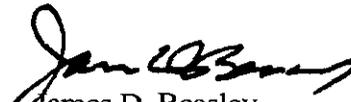
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Response in Opposition to Reliant Energy Power Generation Inc.'s Motion to Compel Tampa Electric Company to Respond to Production Request No. 4.

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

AFA 2
APP _____
CAF _____
CMU _____
CTR _____ JDB/pp
EAG _____ Enclosures
LEG 2
MAS 5
OPC _____ cc: All Parties of Record (w/enc.)
RPR _____
SEC _____
WAW _____
OTH _____

RECEIVED & FILED


FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

02648 FEB 28 00

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 28, 2000

**TAMPA ELECTRIC COMPANY'S RESPONSE IN OPPOSITION
TO RELIANT ENERGY POWER GENERATION INC.'S
MOTION TO COMPEL TAMPA ELECTRIC COMPANY
TO RESPOND TO PRODUCTION REQUEST NO. 4**

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Rule 28-106.206, Florida Administrative Code, responds in opposition to Reliant Energy Power Generation Inc.'s ("Reliant") Motion to Compel Tampa Electric to respond to Production Request No. 4 as follows:

1. Counsel for Tampa Electric and Reliant have discussed Tampa Electric's production of documents responsive to Reliant's Request No. 4 with proprietary competitive business information redacted therefrom in order to comply with Reliant's request without adversely affecting Tampa Electric's competitive interests.

2. Tampa Electric has reviewed the documents requested by Reliant covering the period 1998, 1999 and 2000 to date. No such documents have been prepared to date relative to the year 2000. In addition, the documents supplied to credit rating agencies by Tampa Electric for the year 1999 contain the same information as set forth in documents supplied for the year 1998 with certain updates.

DOCUMENT NUMBER-DATE

02648 FEB 28 8

FPSC-RECORDS/REPORTING

3. Tampa Electric has reviewed this documentation, has redacted the proprietary, competitive information in accordance with discussions with Reliant and will furnish Reliant the redacted documents.

4. Tampa Electric has only redacted that information, the public disclosure of which would harm Tampa Electric's competitive interests and perhaps those of its affiliates. The company adheres to the concerns expressed in its objection to Reliant's Request No. 4, notwithstanding the company's willingness to compromise with Reliant on providing their requested documents in a redacted form.

DATED this 28th day of February, 2000.

Respectfully submitted,



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 Response in Opposition, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (*) on this 28th day of February, 2000 to the following:

Mr. Robert V. Elias*
Ms. Grace A. Jaye*
Staff Counsel
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Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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ATTORNEY

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