

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 28, 2000
Company	)	
_____	)	

**TAMPA ELECTRIC COMPANY’S RESPONSE, MOTION FOR PROTECTIVE ORDER, AND OBJECTIONS TO STAFF’S FIRST SET OF INTERROGATORIES (NOS. 1-7)**

Pursuant to Rule 28-106.206, Florida Administrative Code and discovery provisions of the Florida Rules of Civil Procedure, Tampa Electric Company (“Tampa Electric” or “the company”) submits the following Response, Motion for Protective Order and Objections to Staff’s First Set of Interrogatories (Nos. 1-7), and says:

1. Tampa Electric objects to Staff’s First Set of Interrogatories (Nos. 1-7) only to the extent that such requests call for any public disclosure of any of the information relating to Tampa Electric Company’s negotiations with Odyssey Manufacturing Company (“Odyssey”), Allied Universal Corporation and Chemical Formulators, Inc. (“Allied/CFI”) relative to a Commercial/Industrial Service Rider (“CISR”) Contract Service Agreement (“CSA”). Tampa Electric plans to submit to the Commission on a confidential basis documentation containing information similar to that requested in Staff’s First Set of Interrogatories. That documentation and accompanying confidential affidavits or testimony will fully describe the negotiations Tampa Electric engaged in with Odyssey on the one hand and Allied/CFI on the other. The sole purpose of this Response, Motion for Protective Order and Objections is to underscore the need for confidential treatment of the information requested by Staff.

DOCUMENT NUMBER-DATE

02650 FEB 28 2000

FPSC-RECORDS/REPORTING

**Motion for Protective Order**

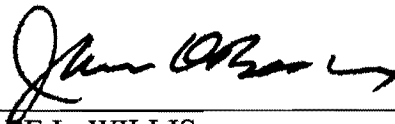
2. Tampa Electric's objections to Staff's interrogatories are submitted pursuant to the authority contained in Slatnick v. Leadership Housing Systems of Florida, Inc., 368 So. 2d 78 (Fla. 3<sup>rd</sup> DCA 1979). To the extent that a motion for protective order is required, Tampa Electric's objections are to be construed as a request for protective order.

DATED this 28<sup>th</sup> day of February 2000.

Respectfully submitted,

HARRY W. LONG, JR.  
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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 Response, Motion for Protective Order and Response, filed on behalf of Tampa Electric Company, has been furnished by hand delivery(\*) or U. S. Mail this 28<sup>th</sup> day of February, 2000 to the following:

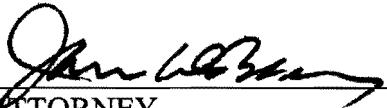
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ATTORNEY

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