

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

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| In re: Fuel and Purchased Power Cost Recovery |) | |
| Clause with Generating Performance Incentive |) | DOCKET NO. 000001-EI |
| Factor. |) | FILED: May 30, 2000 |
| _____ |) | |

**TAMPA ELECTRIC COMPANY'S OBJECTIONS,
MOTION FOR PROTECTIVE ORDER AND WRITTEN RESPONSE
TO FIPUG'S FIRST REQUESTS FOR ADMISSION (NOS. 1-27)**

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to the Commission's Order Establishing Procedure (Order No. PSC-00-531-PCO-EI dated March 15, 2000), submits the following Objections, Motion for Protective Order and written response to Florida Industrial Power Users Group's ("FIPUG") First Set of Requests for Admission to Tampa Electric Company Nos. 1-27 and, as grounds therefor, says:

Preliminary Nature of These Objections

The objections stated herein are preliminary in nature and should additional grounds for objections be discovered as Tampa Electric attempts to produce documents in this proceeding, the company reserves the right to supplement or revise or modify its objections. Should Tampa Electric determine that a further protective order is necessary with respect to any of the information requested, Tampa Electric reserves the right to file a motion with the Commission.

GENERAL OBJECTIONS

Tampa Electric makes the following general objections to FIPUG's First Set of Requests for Admission (Nos. 1-27):

DOCUMENT NUMBER-DATE
06609 MAY 30 8
FPSC-RECORDS/REPORTING

1. Tampa Electric objects to each request insofar as it seeks to impose obligations on Tampa Electric which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.

2. Tampa Electric objects to each and every discovery request to the extent such request calls for information which is exempt from discovery by virtue of the attorney/client privilege, work product privilege, or other applicable privilege.

3. Tampa Electric objects to each and every discovery request insofar as the request is vague, ambiguous, overly broad, imprecise or utilizes terms that are subject to multiple interpretations but are not properly defined or explained.

4. Tampa Electric objects to each and every discovery request insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding.

5. Tampa Electric objects to each discovery request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Section 90.506, Florida Statutes, or which is proprietary confidential business information.

Motion for Protective Order

6. Tampa Electric's objections to FIPUG's discovery requests are submitted pursuant to the authority contained in Slatnick v. Leadership Housing Systems of Florida, Inc., 368 So. 2d 78 (Fla. 3rd 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 a Protective Order.

WHEREFORE, Tampa Electric submits the foregoing as its Response, Motion for Protective and Objections relating to FIPUG's First Set of Requests for Admission Nos. 1-27.

DATED this 30th day of May, 2000.

Respectfully submitted,



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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 Objections to FIPUG's First Set of Requests for Admission (Nos. 1-27), filed on behalf of Tampa Electric Company, has been served by hand delivery (*) or U. S. Mail on this 30th day of May 2000 to the following:

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