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September 25, 2000

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

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RECORDS AND
REPORTING

Re: Docket No. 000061-EI

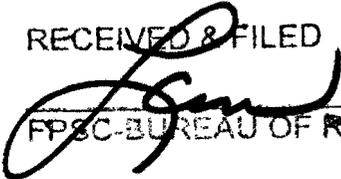
Dear Ms. Bayo:

Enclosed for filing on behalf of Allied/CFI are the originals and fifteen copies of:

1. Allied/CFI's Objections in Response to Tampa Electric Company's First Request for Production of Documents (Nos. 1-12); **12064-00**
2. Allied/CFI's Objections in Response to Tampa Electric Company's First Set of Interrogatories (Nos. 1-24); **12065-00**
3. Allied/CFI's Response in Opposition to Odyssey's Request for Confidential Classification; and ~~0012~~ **12066-00**
4. Allied/CFI's Notice of Intent to Request Confidential Classification.

Please acknowledge these filings by date-stamping and returning the enclosed copy of this

APP _____
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RUTLEDGE, ECENIA, PURNELL & HOFFMAN

Ms. Blanca S. Bayo, Director
Page 2
September 25, 2000

Thank you for your assistance with this filing.

Sincerely,


John R. Ellis

JRE/rl
Enclosures
cc: All Counsel
Trib.3

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Allied Universal Corporation and Chemical Formulators, Inc. against Tampa Electric Company for violation of Sections 366.03, 366.06(2) and 366.07, Florida Statutes, with respect to rates offered under Commercial/Industrial Service Rider tariff; petition to examine and inspect confidential information; and request for expedited relief.

Docket No. 000061-EI

Filed: September 25, 2000

ALLIED/CFI'S OBJECTIONS IN RESPONSE TO TAMPA ELECTRIC COMPANY'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-12)

Allied Universal Corporation ("Allied") and its affiliate, Chemical Formulators, Inc. ("CFI"), hereinafter referred to collectively as "Allied/CFI," by and through their undersigned counsel, and pursuant to Rule 1.350, Florida Rules of Civil Procedure, Rule 28-106.206, Florida Administrative Code, and Order No. PSC-00-0392-PCO-EI issued on February 23, 2000 in this proceeding, hereby serve the following objections to the First Request for Production of Documents (Nos. 1-12) served by Tampa Electric Company ("TECO").

General Objections

1. Allied/CFI objects to each request insofar as it seeks to impose obligations on Allied/CFI which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.
2. Allied/CFI objects to each request insofar as it calls for information which is protected against discovery by the attorney/client privilege, the attorney work product privilege, or other applicable privilege.
3. Allied/CFI objects to each request insofar as it would require Allied/CFI to identify and produce copies of pleadings, discovery responses, or other documents filed in this proceeding.

DOCUMENT NUMBER-DATE

12064 SEP 25 00

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Objections to Requests

1. Allied/CFI objects to Request No.1 on the grounds that it calls for trade secret information, and that it calls for documents containing information which is not relevant to the subject matter of this proceeding and not calculated to or likely to lead to the discovery of evidence which would be admissible in this proceeding. See, Southern Bell T.&T. v. Mobile American Corporation, Inc., 291 So.2d 199 (Fla. 1974).

2. Allied/CFI objects to Request No. 2 on the grounds that it calls for trade secret information, and that it calls for documents containing information which is not relevant to the subject matter of this proceeding and not calculated to or likely to lead to the discovery of evidence which would be admissible in this proceeding. See, Southern Bell T.&T. v. Mobile American Corporation, Inc., 291 So.2d 199 (Fla. 1974).

3. Allied/CFI objects to Request No. 3 on the grounds that it calls for trade secret information, and that it calls for documents containing information which is not relevant to the subject matter of this proceeding and not calculated to or likely to lead to the discovery of evidence which would be admissible in this proceeding. See, Southern Bell T.&T. v. Mobile American Corporation, Inc., 291 So.2d 199 (Fla. 1974).

4. Allied/CFI objects to Request No. 6 on the grounds that it calls for trade secret information which Allied/CFI already has provided to TECO but has not provided and objects to providing to Odyssey Manufacturing Company and its affiliates (“Odyssey”). Without waiver of this objection, Allied/CFI will provide copies of all responsive documents to TECO.

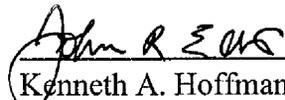
5. Allied/CFI objects to Request No. 7 on the grounds that it calls for trade secret information which Allied/CFI already has provided to TECO but has not provided and objects to

providing to Odyssey. Without waiver of this objection, Allied/CFI will provide copies of all responsive documents to TECO.

6. Allied/CFI objects to Request No. 8 on the grounds that it calls for trade secret information which Allied/CFI already has provided to TECO but has not provided and objects to providing to Odyssey. Additionally, Allied/CFI objects to the use of the term "negotiations" as stated in Allied/CFI's response to Request No. 8 of TECO's First Request for Admissions served on Allied/CFI. Without waiver of these objections, Allied/CFI will provide copies of all responsive documents to TECO.

7. Allied/CFI objects to Request No. 12 on the grounds that it calls for trade secret information which Allied/CFI already has provided to TECO but has not provided and objects to providing to Odyssey. Without waiver of this objection, Allied/CFI will provide copies of all responsive documents to TECO.

Respectfully submitted,



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Attorneys for Allied Universal Corporation and
Chemical Formulators, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Allied/CFI's Objections in Response to Tampa Electric Company's First Request for Production of Documents (Nos. 1-12) was furnished by U. S. Mail to the following this 25th day of September, 2000:

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Marlene Stern, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 370
Tallahassee, Florida 32399-0850

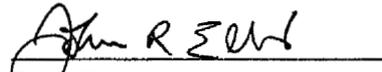
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Allied/objections.rtp