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October 16, 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 for approval of a special contract with IMC Phosphates Company for provision of interruptible electric service by Tampa Electric Company  
FPSC Docket No. 001287-EI

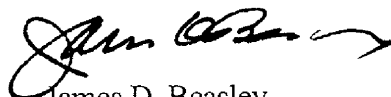
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Objections in Response to Staff's First Set of Interrogatories (Nos. 1-23).

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

JDB/pp  
Enclosures

DOCUMENT NUMBER-DATE  
13123 OCT 16 8  
FPSC-RECORDS/REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for approval of a special )  
contract with IMC Phosphates Company )  
for provision of interruptible electric )  
service by Tampa Electric Company. )  
\_\_\_\_\_ )

DOCKET NO. 001287-EI

FILED: October 16, 2000

**TAMPA ELECTRIC COMPANY'S OBJECTIONS IN RESPONSE TO  
STAFF'S FIRST SET OF INTERROGATORIES (NOS.1-23)**

Pursuant to Rule 1.340, Florida Rules of Civil Procedure and Rule 28-106.206, Florida Administrative Code, Tampa Electric Company ("Tampa Electric" or "Company"), by and through its undersigned counsel, hereby files its objections to the First Set of Interrogatories (Nos. 1 - 23) served by the Staff of the Florida Public Service Commission ("Staff") on Tampa Electric and says:

**Objections to Specific Request**

1. Interrogatory 6a) asks Tampa Electric to provide the date, time, duration, MWH purchased and dollar/MWH for each time Tampa Electric purchased power for IMC under the optional provision covering the period January 1997 through August 2000. Tampa Electric Company objects to Interrogatory No. 6a) and moves for a protective order relative to such interrogatory on the ground that responding to this interrogatory would require very lengthy and time consuming analysis of numerous documents, including daily log sheets for each day and hour of optional provision purchase for each IMC account since January 1997, and the preparation of summaries of

such documents. The creation of the response would require the devotion of significant resources thus effecting an undue burden and expense on Tampa Electric that would have little probative value in this proceeding. In lieu of having to create an analysis of the type described in Interrogatory 6a), Tampa Electric offers to provide Staff with monthly summaries of IMC's purchases, both on-peak and off-peak, detailing the MWH purchased and the dollars per MWH charged to IMC, together with the dates, times and durations for all interruptions of interruptible customers covering the period in question. This should provide Staff the information it needs without unduly burdening Tampa Electric. If that information is not adequate for Staff's purposes, then Tampa Electric, pursuant to Rule 1.340(c), Florida Rules of Civil Procedure, will offer up the underlying documents from which Staff's requested analysis can be derived in order to allow Staff to prepare its own compilation, abstract or summary based on these records. The burden of performing such work would be substantially the same for Staff as it would be for Tampa Electric. Tampa Electric would provide such documents on a confidential basis in the offices of Tallahassee counsel together with sufficiently detailed information to permit Staff to locate and identify the records from which the answer may be derived or ascertained.

2. Tampa Electric objects to Interrogatory No. 23 on the grounds that it calls for information that is speculative and not relevant to the subject matter of the Petition pending before the Commission in this proceeding.

3. The Company is anxious to provide the Commission and Staff with any information that is reasonably calculated to assist the Commission in its deliberations. However, Interrogatory No. 23 would require Tampa Electric to devote significant

resources to the creation of an analysis that would be based on scenarios that are not relevant.

4. The exercise of exploring how IMC would have fared under the proposed interruptible service agreement if that agreement had been in effect between January 1998 and August 2000 is meaningful only if one assumes that the relevant circumstances extant during that period will recur and persist in the future. Tampa Electric respectfully suggests that there is no reasonable basis for that heroic assumption since the proposed rates were established on the basis of projected future circumstances.

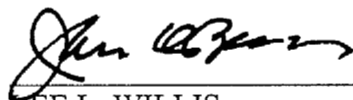
WHEREFORE, Tampa Electric submits the foregoing objections to the First Set of Interrogatories (Nos. 1- 23) served by the Staff in this proceeding.

DATED this 16<sup>th</sup> day of October, 2000.

Respectfully submitted,

HARRY W. LONG, JR.  
Assistant General Counsel  
Tampa Electric Company  
Post Office Box 111  
Tampa, Florida 33601  
(813) 228-1702

and



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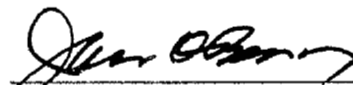
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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Objections in Response to Staff's First Set of Interrogatories, has been served by hand delivery on this 16<sup>th</sup> day of October 2000 to the following:

Ms. Deborah D. Hart  
Staff Counsel  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

  
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ATTORNEY