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ORIGINAL

November 20, 2000

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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RECORDS AND
REPORTING

Re: Complaint of Allied Universal Corporation and Chemical Formulators, Inc.
against Tampa Electric Company: FPSC Docket No. 000061-EI

FILING OF CONFIDENTIAL INFORMATION

Dear Ms. Bayo:

Please find enclosed Tampa Electric Company's answers to Staff's Request For Production of Documents (Nos. 1-8) in the above-mentioned proceeding. In addition, enclosed, in a sealed envelope, is a single highlighted version of Tampa Electric Company's answers to Staff's First Set of Interrogatories (Nos. 1-7). The portions of these interrogatory responses that contain confidential material are printed on yellow paper.

In particular, the Company's response to Staff Interrogatory No. 1 consists of a detailed timeline, identified as Bates Stamp Page Nos. 1931 and 1932, charting Tampa Electric's Commercial Industrial Service Rider ("CISR") negotiations with Odyssey Manufacturing Company ("Odyssey") and Allied Universal Corporation/Chemical Formulators, Inc. ("Allied/CFI"). The Commission has granted confidential classification to these pages in Order No. PSC-00-1886-CFO-EI. Tampa Electric's response to Staff Interrogatory No. 3 includes two pages of tables detailing the Company's incremental cost calculations for Odyssey and Allied/CFI. The Commission ruled in Order No. PSC-00-1171-CFO-EI that such information is proprietary and should not be disclosed to the parties, even pursuant to the non-disclosure agreement approved for use in this proceeding. Therefore, the portions of Tampa Electric's response to Interrogatory No. 3 that should be redacted are shaded in gray.

Two sets of the Company's responses to the above-mentioned interrogatories, with the confidential information redacted, are enclosed for placement in the Commission's public files. A properly redacted copy of the above-mentioned interrogatory responses has been served on the parties of record who have executed the non-disclosure agreement approved by the Commission

RECEIVED & FILED


FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

15001 NOV 20 00

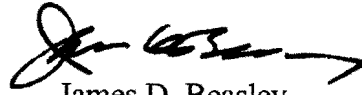
FPSC-RECORDS/REPORTING

for use in this proceeding. Copies of Tampa Electric's answers to Staff's document requests have been served on all parties of record.

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 time and attention in this matter.

Sincerely,



James D. Beasley

JDB/pp
Enclosures

cc: All Parties of Record (w/ enc.)

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of Allied Universal Corporation and Chemical Formulators, Inc. against Tampa Electric Company)	DOCKET NO. 000061-EI
For violation of Sections 366.03, 366.02(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.)	FILED: November 20, 2000

**TAMPA ELECTRIC COMPANY'S
ANSWERS TO FIRST SET OF INTERROGATORIES (NOS. 1-7)
OF
THE FLORIDA PUBLIC SERVICE COMMISSION STAFF**

Tampa Electric files this its Answers to Interrogatories (Nos. 1-7) propounded and served by U.S. mail on February 17, 2000, by the Florida Public Service Commission Staff.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 000061-EI
STAFF'S 1st SET OF INTERROGATORIES
INTERROGATORY NO. 1
PAGE 1 of 3**

1. Please provide a detailed outline indicating each step of the negotiation process between TECO and Odyssey. Please start with the initial contact with the customer regarding rate relief until the signing of the CSA. Please include each meeting between TECO representatives and Odyssey representatives and indicate the date each meeting took place.

- A. Please see the attached documents, identified as Bates Stamp Nos. 1931 and 1932, that were included in the proprietary confidential business information that Tampa Electric filed with the Commission on March 10, 2000. These confidential documents include each step/sub-step of Tampa Electric's CISR negotiation process and the corresponding dates of Tampa Electric's negotiations with Odyssey and Allied/CFI. Tampa Electric has shown the dates of the Odyssey negotiations side-by-side with the Allied/CFI negotiations in order to facilitate a comparability assessment.

Additional information regarding meetings between Tampa Electric representatives and Odyssey representatives is also provided in Tampa Electric's response to Interrogatory No. 12 of the Allied Universal Corp. and Chemical Formulators, Inc. 2nd Set.

REDACTED

IAWIFA ELECTRIC COMPANY
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INTERROGATORY NO. 1
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1931

REDACTED

TAMPA ELECTRIC COMPANY
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INTERROGATORY NO. 1
PAGE 3 OF 3

1932

**TAMPA ELECTRIC COMPANY
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STAFF'S 1st SET OF INTERROGATORIES
INTERROGATORY NO. 2
PAGE 1 of 1**

- 2.** Please provide a detailed outline indicating each step of the negotiation process between TECO and Allied/CFI. Please start with the initial contact with the customer regarding rate relief until the negotiations ceased. Please include each meeting between TECO representatives and Allied/CFI representatives and indicate the date each meeting took place.
- A.** Please see Tampa Electric's response to Interrogatory No. 1.

**TAMPA ELECTRIC COMPANY
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STAFF'S 1st SET OF INTERROGATORIES
INTERROGATORY NO. 3
PAGE 1 of 3**

- 3.** Please show separately incremental cost calculations for Odyssey and Allied/CFI. For purposes of this interrogatory, incremental costs are defined as the additional costs incurred to serve the additional load resulting from the use of CISR rates. Please show all incremental cost components separately: incremental capital costs for generation, for transmission, and for distribution; incremental variable costs for fuel, variable O&M, and other variable costs; and all other contract-specific costs.

- A.** The attached tables reflect the incremental capital, fuel, O&M, and contract-specific costs for Odyssey and Allied/CFI over a ten-year period beginning with the in-service year of each customer's facility. (Odyssey's in-service year is 2000. Allied/CFI's in-service year is 2001.)

INCREMENTAL COST CALCULATION FOR ODYSSEY MANUFACTURING CO.

YEAR	A&G PLANT RELATED COSTS \$(000)	A&G NON PLANT RELATED COSTS \$(000)	AVERAGE MARGINAL FUEL COSTS \$(000)	GENERATION VAR. O&M COSTS \$(000)	GENERATION FUEL COSTS \$(000)	TRANS CAPACITY COSTS \$(000)	TRANS O&M COSTS \$(000)	SUBTRANS CAPACITY COSTS \$(000)	SUBTRANS O&M COSTS \$(000)	DISTRIB. PRIMARY CAPACITY COSTS \$(000)	DISTRIB. PRIMARY O&M COSTS \$(000)	DISTRIB. SECONDARY CAPACITY COSTS \$(000)	DISTRIB. SECONDARY O&M COSTS \$(000)	OTHER CUSTOMER SPECIFIC COSTS \$(000)	TOTAL INCREMENTAL COSTS \$(000)
2000															
2001															
2002															
2003															
2004															
2005															
2006															
2007															
2008															
2009															
NOMINAL NPV:															

TAMPA ELECTRIC COMPANY
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STAFF'S 1ST SET OF INTERROGATORIES
INTERROGATORY NO. 3
PAGE 2 OF 3

INCREMENTAL COST CALCULATION FOR ALLIED/CFI

YEAR	A&G PLANT RELATED COSTS \$(000)	A&G NON PLANT RELATED COSTS \$(000)	AVERAGE MARGINAL FUEL COSTS \$(000)	GENERATION VAR. O&M COSTS \$(000)	GENERATION FUEL COSTS \$(000)	TRANS CAPACITY COSTS \$(000)	TRANS O&M COSTS \$(000)	SUBTRANS CAPACITY COSTS \$(000)	SUBTRANS O&M COSTS \$(000)	DISTRIB. PRIMARY CAPACITY COSTS \$(000)	DISTRIB. PRIMARY O&M COSTS \$(000)	DISTRIB. SECONDARY CAPACITY COSTS \$(000)	DISTRIB. SECONDARY O&M COSTS \$(000)	OTHER CUSTOMER SPECIFIC COSTS* \$0	TOTAL INCREMENTAL COSTS \$(000)
2001	[REDACTED]														
2002	[REDACTED]														
2003	[REDACTED]														
2004	[REDACTED]														
2005	[REDACTED]														
2006	[REDACTED]														
2007	[REDACTED]														
2008	[REDACTED]														
2009	[REDACTED]														
2010	[REDACTED]														
NOMINAL NPV:	[REDACTED]														
	[REDACTED]														

TAMPA ELECTRIC COMPANY
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 STAFF'S 1ST SET OF INTERROGATORIES
 INTERROGATORY NO. 3
 PAGE 3 OF 3

**TAMPA ELECTRIC COMPANY
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STAFF'S 1st SET OF INTERROGATORIES
INTERROGATORY NO. 4
PAGE 1 of 1**

4. Please state the negotiated base energy and/or base demand charge, and other terms and conditions, if applicable, offered to and accepted by Odyssey. Please indicate the difference between the negotiated rate(s) and the otherwise applicable rates. Please include a written explanation as to how the final rate(s), and other terms and conditions, if applicable, offered to and accepted by Odyssey were determined.

- A. Please refer to Tampa Electric's response to Interrogatory No. 15 of Allied Universal Corp. and Chemical Formulators, Inc.'s 2nd Set.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 000061-EI
STAFF'S 1st SET OF INTERROGATORIES
INTERROGATORY NO. 5
PAGE 1 of 1**

- 5.** Please state the negotiated base energy and/or base demand charge, and other terms and conditions, if applicable, offered to Allied/CFI. Please indicate the difference between the negotiated rate(s) and the otherwise applicable rates. Please include a written explanation as to how the final rate(s), and other terms and conditions, if applicable, offered to Allied/CFI were determined.

- A.** Please refer to Tampa Electric's response to Interrogatory No. 16 of Allied Universal Corp. and Chemical Formulators, Inc.'s 2nd Set.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 000061-EI
STAFF'S 1st SET OF INTERROGATORIES
INTERROGATORY NO. 6
PAGE 1 of 1**

- 6.** Please indicate whether the rate(s), and other terms and conditions, if applicable, offered to Odyssey and Allied/CFI pursuant to the CISR differ. If so, please provide a detailed written explanation explaining the rationale for the differing offerings.

- A.** Please refer to Tampa Electric's response to Interrogatory No. 17 of Allied Universal Corp. and Chemical Formulators, Inc.'s 2nd Set.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 000061-EI
STAFF'S 1st SET OF INTERROGATORIES
INTERROGATORY NO. 7
PAGE 1 of 1**

7. Allied/CFI states in its complaint (page 10) that the TECO employee who negotiated the CISR rate for Odyssey has accepted employment with Odyssey. Please indicate to what extent this employee participated in the CISR negotiations between TECO and Odyssey. What was this employee's role and title on the CISR Review Team? At what point during/after the CISR negotiations did this employee accept employment with Odyssey?
- A. The employee who participated in the CISR negotiations was an account manager in Tampa Electric's Marketing and Sales Department. One of the accounts that the employee was responsible for was Odyssey. His primary job responsibilities included: 1) building intimate Customer relationships with corporate decision-makers to meet or exceed company objectives and departmental goals, 2) promoting/selling products and services required to meet Customer needs, 3) promoting the safe and efficient use of energy, 4) coordinating the delivery of company resources, 5) developing industry expertise, and 6) acting as the Customer's point of contact in interactions with the company, while understanding and balancing the interest of the Customer, company and its shareholders.

The employee's title on the CISR team was "Account Manager" and he reported directly to the "Project Sponsor" of the CISR team. As the "Account Manager" on the CISR team, his role included conducting direct negotiations with Odyssey for the CISR as well as the job responsibilities listed above.

The CISR Steering Committee approved the Odyssey contract on September 10, 1998. The employee terminated employment from Tampa Electric on January 30, 1999. Tampa Electric is not aware of his employment date with Odyssey.