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January 30, 2001

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RECORDS AND
REPORTING

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

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

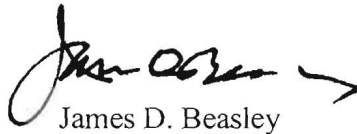
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Motion for Expedited Responses to Second Request for Production of Documents Nos. 13-24 to Allied Universal Corporation and Chemical Formulators, Inc.

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

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

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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Allied Universal Corporation)
Chemical Formulators, Inc. against Tampa Electric)
Company for Violation of Sections 366.03, 366.06(2)) DOCKET NO. 000061-EI
and 366.07, Florida Statutes, with respect to Rates) FILED: January 30, 2001
Offered Under Commercial/Industrial Service Rider)
Tariff and Petition to Examine and Inspect Confidential)
Information and Request for Expedited Relief.)
_____)

**TAMPA ELECTRIC COMPANY'S MOTION FOR EXPEDITED RESPONSES
TO SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 13-24) TO
ALLIED UNIVERSAL CORPORATION AND CHEMICAL FORMULATORS, INC.**

Tampa Electric Company ("Tampa Electric" or "the company") respectfully moves the Commission through its prehearing officer for the entry of an order requiring expedited responses to Tampa Electric Company's Second Request for Production of Documents to Allied Universal Corporation and Chemical Formulators, Inc. ("Allied/CFI"), and as grounds therefor, says:

1. Tampa Electric Company is this date filing and serving its Second Request for Production of Documents (Requests Nos. 13 through 24) to Allied/CFI. Many of the documents requested pertain to matters that will be the subject of the deposition of Dr. Charles Phillips, Jr., Allied/CFI's witness, now scheduled to be conducted on February 5, 2001. Tampa Electric is in need of the requested documents by Monday morning, February 5, 2001 at 9:00 a.m. in order to have meaningful opportunity to depose Dr. Phillips. Tampa Electric likewise needs the expedited production of the remaining requested documents in order to have a meaningful opportunity to prepare for hearing.

2. Requiring Allied/CFI to produce the requested documents by Monday morning, February 5, 2001, will afford Allied/CFI adequate time to produce the documents for Tampa

Electric and at the same time will afford Tampa Electric the bare minimum opportunity to prepare its case, given the proximity of Dr. Phillips deposition and the hearing scheduled in this matter.

WHEREFORE, Tampa Electric moves the Commission for the entry of an order requiring Allied/CFI to produce the documents sought in Tampa Electric's Second Request for Production of Documents by 9:00 a.m. Monday morning, February 5, 2001.

DATED this 30th day of January 2001.

Respectfully submitted,



LEE L. WILLIS
JAMES D. BEASLEY
Ausley & McMullen
Post Office Box 391
Tallahassee, FL 32302
(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Motion for Expedited Response to Second Request for Production, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (*) on this 30th day of January 2001 to the following:

Mr. Robert V. Elias*
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

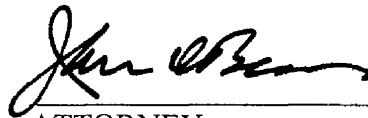
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