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March 29, 2001

BY HAND DELIVERY

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

Re: Determination of Regulated Earnings of Tampa Electric Company
Pursuant to Stipulations for Calendar Years 1995 through 1999;
Docket No. 950379-EI

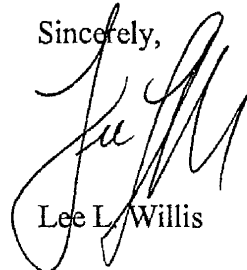
Dear Ms. Bayo:

Enclosed for filing in the above referenced are the original and fifteen (15) copies of Preliminary Objections to Public Counsel's First Request for Production of Documents (1999) to Tampa Electric Company (No. 1).

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,



Lee L. Willis

LLW/bjd
Enclosures

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

DOCUMENT NUMBER-DATE

03925 MAR 29 2001

FPSC RECORDS/REPORTING

4. Tampa Electric objects to Document Request No. 1 to the extent that the information requested constitutes “trade secrets” which are privileged pursuant to § 90.506, F.S. or which is proprietary confidential business information. Notwithstanding its objection, Tampa Electric will produce documents which contain propriety confidential business information under the Commission’s procedures for protecting confidential information as a mutually acceptable procedure which provides OPC access to this information and which maintains the confidentiality of the documents.

5. Tampa Electric objects to Document Request No. 1 to the extent it seeks “all” documents on the ground that such requirement is burdensome, excessive, oppressive and/or excessively expensive. Tampa Electric is a large corporation with employees located in many different locations. In the course of its business, Tampa Electric creates numerous documents that are not subject to Florida Public Service Commission or other governmental records retention requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or its business is reorganized. Nevertheless, Tampa Electric will make a good faith effort to locate responsive documents in all locations where they are expected to be found in the ordinary course of business.

6. Tampa Electric objects to the definitions provided as overbroad and burdensome.

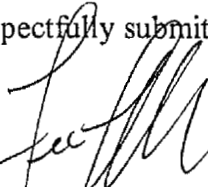
Motion for Protective Order

7. 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 Preliminary Objections to OPC’s First Request for Production of Document (No. 1).

DATED this 29th day of March 2001.

Respectfully submitted,



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KENNETH R. HART
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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Preliminary Objections to Public Counsel's First Request for Production of Documents (1999) to Tampa Electric Company (No. 1), filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (*) on this 29th day of March 2001 to the following:

Mr. Robert V. Elias*
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