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COMMISSION
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September 9, 2002

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

Re: Docket No. 020384-GU

Dear Ms. Bayo:

Enclosed for filing in the above-referenced docket are the original and 15 copies of Citizens' Response to Peoples Gas System's Consolidated Objections to Citizens' First Set of Interrogatories (Nos. 1-49) and First Set of Requests for Production of Documents (Nos. 1-71)

Please indicate the time and date of receipt on the enclosed duplicate of this letter and return it to our office.

AUS _____
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COM _____
CTR _____
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GCL _____
OPC _____
MMS _____
SEC I
OTH _____

Sincerely,

H F. Mann
Associate Public Counsel

HFM:bsr

Enclosures

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

09534 SEP-99

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Application for a rate)
increase by Tampa Electric)
Company d/b/a Peoples Gas)
System.)

Docket No. 020384-GU

Filed: September 9, 2002

**CITIZENS' RESPONSE TO PEOPLES GAS SYSTEM'S CONSOLIDATED
OBJECTIONS TO CITIZENS' FIRST SET OF INTERROGATORIES (Nos. 1-49)
AND FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS (Nos. 1-71)**

The Citizens of Florida, by and through Jack Shreve, Public Counsel, file this Response to Peoples Gas System's Consolidated Objections to Citizens' First Set of Interrogatories (Nos. 1-49) and First Set of Requests for Production of Documents (Nos. 1-71)

1. On August 21, 2002, Citizens of Florida ("Citizens") served, by U.S. Mail, our first set of interrogatories and our first set of requests for production of documents on Tampa Electric Company d/b/a Peoples Gas System ("PGS" or "Peoples"). On September 3, 2002, the Citizens were served with Peoples' "Consolidated Objections" to our discovery requests.

2. The Company acknowledges that these objections are "preliminary in nature" and are filed to comply with the requirements of the Commission's Order Establishing Procedure, No. PSC-02-1031-PCO-GU, dated July 30, 2002. That Order requires that any objection to or request for clarification of discovery be made within ten (10) days of service.

3. Unfortunately, that apparently has not provided PGS with sufficient time to

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FPSC-COMMISSION CLERK

review all of the possible documents or answers in response that would meet the parameters of Citizens' discovery requests.

4. Peoples' objections address all of Citizens' interrogatories and requests for production as a group, by vaguely citing to "any that seeks," or "each to the extent that it calls for," answers or documents that PGS thinks might be objectionable, once it has had an opportunity to consider its possible responses. Furthermore, Peoples claims that these generalized objections to still unidentified discovery requests should apply "with respect to each of the Requests as though separately stated as to each."

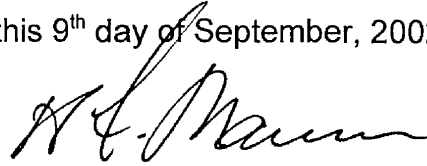
5. Citizens assert that these "Consolidated," "Preliminary," "General," objections are in no way "stated as to each," inasmuch as they fail to identify any specific discovery request. Citizens believe that these objections are thus inapplicable to Citizens' discovery requests.

6. Under the circumstances, Peoples' objections do not require any further answer or action by Citizens to maintain the full force of its discovery requests. In the event that Peoples fails to respond, or objects, to any specific discovery request, Citizens reserve the right to address the same as provided for in the applicable rules of the Florida Rules of Civil Procedure.

7. Citizens trust that the continuing, open dialogue between Peoples and Citizens regarding discovery will resolve any and all concerns of both parties without necessitating intervention by this Commission.

8. However, until such time as PGS files a specific objection, or fails to respond, to an identified discovery request, Citizens cannot, and do not intend to, attempt to respond with a prayer for intercession by this Commission.

Respectfully submitted this 9th day of September, 2002,



H F. Rick Mann
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Attorney for the Citizens
of the State of Florida

**DOCKET NO. 020384-GU
CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S.
Mail, hand-delivery*, or facsimile** to the following parties on this 9th day September,
2002.



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