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October 8, 2002

625 COURT STREET P O BOX 1669 (ZIP 33757) CLEARWATER, FLORIDA 33755 (727) 441-8966 FAX (727) 442-8470

IN REPLY REFER TO

Ansley Watson, Jr. P.O. Box 1531 Tampa, Florida 33601 e-mail: aw@macfar.com COP CLERK OT -8 FH12:

#### VIA HAND DELIVERY

Blanca S. Bayo, Director Division of Commission Clerk & Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Docket No. 020384-GU -- Application for a rate increase by Tampa Electric Company d/b/a PEOPLES GAS SYSTEM

Dear Ms. Bayo:

AUS CAF

CMP COM

CTR ECR

GCL OPC MMS SEC OTH AWjr/a

Enclosures

Enclosed for filing in the above docket on behalf of Peoples Gas System, please find the original and 20 copies of Peoples' Response to Staff's Second Request for Production of Documents to Peoples Gas System (Nos. 17-24).

Please acknowledge your receipt and the date of filing of the enclosures on the duplicate copy of this letter, and return the same to me in the enclosed preaddressed envelope.

Thank you for your assistance.

Sincerely,

ANSLEY WÁTSON, JR.

RECEIVED & FILED 10836 CCT-68 ORDS FPSC-UCLAR ELCA CLERK

Blanca S. Bayo, Director October 8, 2002 Page 2

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cc: Parties of Record Ms. Angela Llewellyn Matthew R. Costa, Esquire

### 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

Submitted for Filing: 10-8-02

### PEOPLES' RESPONSE TO STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO PEOPLES GAS SYSTEM (Nos. 17-24)

Peoples Gas System ("Peoples" or the "Company"), by its undersigned attorneys,

files its Response to Staff's Second Request for Production of Documents (Nos. 17-24)

(the "Request") and, as to the correspondingly numbered categories of the Request, says:

17-24. Peoples has provided to the Commission Staff copies of documents

responsive to Categories 17 through 24, inclusive, of the Request.

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ANSLEY WATSON, JR. Macfarlane Ferguson & McMullen P. O. Box 1531 Tampa, Florida 33601-1531 (813) 273-4321

and

MATTHEW R. COSTA Legal Department TECO Energy, Inc. P. O. Box 111 Tampa, Florida 33601-1531 (813) 228-4938

Attorneys for Peoples Gas System

DOCUMENT MEMOTE - DATE 10886 OCT - 88 FPSC-COM TOSION CLERK

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Response has been furnished by hand delivery\* or regular U.S. Mail\*\* to the following, this 8th day of October, 2002:

John W. McWhirter, Jr., Esquire\*\* McWhirter, Reeves, McGlothlin *et al.* P. O. Box 3350 Tampa, Florida 33601-3350

Adrienne E. Vining, Esquire\* Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

H. F. Rick Mann, Esquire\* Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street Room 812 Tallahassee, Florida 32399-1400 Donna DeRonne\*\* Larkin & Associates, PLLC 15728 Farmington Road Livonia, Michigan 48154

Vicki Gordon Kaufman, Esquire\*\* Timothy J. Perry, Esquire McWhirter, Reeves, McGlothlin *et al.* 117 S. Gadsden Street Tallahassee, Florida 32301

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Ansley Watson, Jr.

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