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IN REPLY REFER TO:

October 24, 2002

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

VIA FEDERAL EXPRESS

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

RECEIVED - FPSC
OCT 25 PM 3:25
COMMISSION CLERK

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

Dear Ms. Bayo:

Enclosed for filing in the above docket on behalf of Peoples Gas System, please find the original only of Peoples' Response to Staff's Fifth Request for Production of Documents to Peoples Gas System (No. 31).

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

Thank you for your assistance.

Sincerely,

Handwritten signature of Ansley Watson, Jr.

ANSLEY WATSON, JR.

AWjr/a
Enclosures

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DOCUMENT NUMBER-DATE

11720 OCT 25 02

FPSC-COMMISSION CLERK

Blanca S. Bayo, Director
October 24, 2002
Page 2

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:
10-25-02

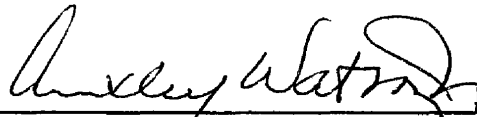
**PEOPLES' RESPONSE TO STAFF'S FIFTH REQUEST FOR
PRODUCTION OF DOCUMENTS TO PEOPLES GAS SYSTEM (No. 31)**

Peoples Gas System ("Peoples" or the "Company"), by its undersigned attorneys, files its Response to Staff's Fifth Request for Production of Documents (No. 31) (the "Request") and, as to the correspondingly numbered categories of the Request, says:

31.a. No formal cost-benefit analysis was performed to support the outsourcing of Peoples' sales and marketing functions. However, justification for the decision to outsource is included in Peoples' answer to Staff Interrogatory No. 106(f).

31.b. TECO Partners does not provide marketing services for Tampa Electric Company.

31.c. Copies of all ads, radio announcements, etc., on behalf of Peoples were made available for inspection and copying by the Florida Citizens and the Commission Staff in response to Category 64 of Citizens' First Set of Requests for Production of Documents to Peoples (Nos. 1-71). Copies of such ads were furnished to the Commission Staff.



ANSLEY WATSON, JR.
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P. O. Box 1531
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DOCUMENT NUMBER DATE

11720 OCT 25 02

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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

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 24th day of October, 2002:

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

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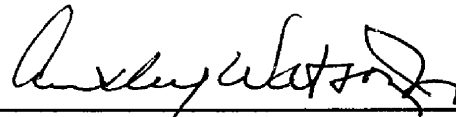
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Ansley Watson, Jr.

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