

AUSLEY & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

March 21, 2003

HAND DELIVERED

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

Re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance
Incentive Factor; FPSC Docket No. 030001-EI

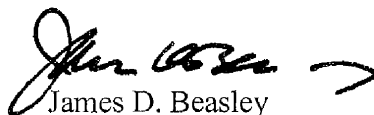
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and ten (10) copies of Tampa
Electric Company's Response to Citizens' First Motion to Compel.

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
Enclosure

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

DOCUMENT NUMBER-DATE
02773 MAR 21 8
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery)
Clause with Generating Performance Incentive) -- DOCKET NO. 030001-EI
Factor.) FILED: March 21, 2003
_____)

**TAMPA ELECTRIC COMPANY'S RESPONSE TO
CITIZENS' FIRST MOTION TO COMPEL**

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Rule 28-106.204, Florida Administrative Code, responds as follows to Citizens' ("OPC's") First Motion to Compel:

1. On March 17, 2003 Tampa Electric filed its Response, Motion for Protective Order and Objections to OPC's First Set of Requests for Production of Documents. In that filing Tampa Electric noted the brief 10-day time frame for filing objections and the fact that it would not be possible for the company to analyze all of the documents which may be responsive to OPC's document requests prior to the due date for written objections. OPC's document requests are quite broad and require the careful review of a significant number of documents in order for the company to properly respond.

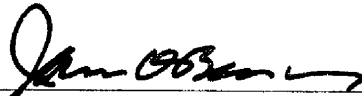
2. In its March 17 filing Tampa Electric explained that, to the extent Tampa Electric later determines that any of its preliminary objections are not needed, they would be withdrawn. Tampa Electric simply did not want any failure on its part to object within the 10-day time period to be construed as an abandonment by Tampa Electric of its right to seek any necessary due process protections to the extent the company's continuing review of documents discloses the need for such protections.

3. Tampa Electric is in the midst of a diligent and good faith examination of documents that may be responsive to OPC's document requests. The company will adhere to the due date for responding to OPC's requests and, as stated earlier, will appropriately modify, supplement or withdraw its preliminary objections once that process is completed.

WHEREFORE, Tampa Electric urges that its preliminary objections be permitted to stand pending the completion of the company's review of documents that may be responsive to OPC's First Request for Production of Documents.

DATED this 21st day of March 2003.

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 Response to Citizens' First Motion to Compel, filed on behalf of Tampa Electric Company, has been served by hand delivery (*) or U. S. Mail on this 21st day of March, 2003 to the following:

Mr. Wm. Cochran Keating, IV*
Senior Attorney
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Mr. James A. McGee
Associate General Counsel
Progress Energy Florida, Inc.
Post Office Box 14042
St. Petersburg, FL 33733

Mr. Joseph A. McGlothlin
Ms. Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman & Arnold, P.A.
117 S. Gadsden Street
Tallahassee, FL 32301

Mr. Robert Vandiver
Associate Public Counsel
Office of Public Counsel
111 West Madison Street – Suite 812
Tallahassee, FL 32399-1400

Mr. Norman Horton
Messer Caparello & Self
Post Office Box 1876
Tallahassee, FL 32302

Mr. John T. Butler
Steel Hector & Davis LLP
200 South Biscayne Boulevard
Suite 4000
Miami, FL 33131-2398

Mr. William Walker
Florida Power & Light Company
215 South Monroe Street, Suite 810
Tallahassee, FL 32301-1859

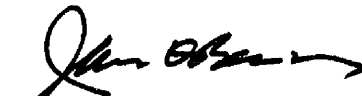
Mr. R. Wade Litchfield
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, FL 33408

Mr. John W. McWhirter, Jr.
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman & Arnold, P.A.
400 North Tampa Street, Suite 2450
Tampa, FL 33601-5126

Ms. Susan Ritenour
Gulf Power Company
One Energy Place
Pensacola, FL 32520

Mr. Jeffrey A. Stone
Mr. Russell A. Badders
Beggs & Lane
Post Office Box 12950
Pensacola, FL 32591-2950

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ATTORNEY