

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Fuel and Purchased Power )  
Cost Recovery Clause with )  
Generating Performance Incentive )  
Factor )  
\_\_\_\_\_)

Docket no. 030001-EI

Filed July 21, 2003

**CITIZENS' THIRD SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO  
TAMPA ELECTRIC COMPANY (NOS. 30 - 36)**

Pursuant to § 350.0611(1), Fla. Stat. (2002), Fla. Admin. Code R. 28-106.206, and Fla. R. Civ. P.1.350, Florida's Citizens ("Citizens"), by and through Jack Shreve, Public Counsel, request Tampa Electric Company ("TECO") to produce the following documents for inspection and copying at the Office of Public Counsel, Claude Pepper Building, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400, on or before Monday, August 20, 2003, or at such other time and place as may be mutually agreed upon by counsel.

**DEFINITIONS**

1. The terms "document" or "documents" are meant to have the broadest possible meaning under applicable law and includes, but is not necessarily limited to, any written, recorded, filmed or graphic matter, whether produced, reproduced, or on paper, e-mail, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, memoranda, notes, minutes, records,

photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, and notes, any of which are in your possession, custody, or control.

2. The term "referring or relating to" means any oral, graphic, demonstrative, telephonic, verbal, electronic (including e-mail), written or other conveyance of information, including but not limited to conversations, telecommunications, and documents.

3. As used herein the terms "you," "your," and "company" refer to Tampa Electric Company, together with the officers, employees, consultants, agents, representatives, and attorneys of Tampa Electric Company, as well as any other person or entity acting on behalf of Tampa Electric Company.

4. Words in the past tense include the present, and words in the present tense include the past. Use of the singular includes the plural, and use of the masculine includes the feminine where appropriate, and vice versa.

## INSTRUCTIONS

1. If any document is withheld under any claim of privilege, please furnish a list identifying each document for which privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control, or reasonably available to you.

3. If Tampa Electric Company has possession, custody, or control of the originals of the documents requested, please produce the originals or a complete copy of the originals and all copies which are different in any way from the original, whether by interlineation, receipt stamp or notation. If Tampa Electric Company does not have possession, custody, or control of the originals of the documents requested, please produce any copies in the possession, custody, or control, however made, of Tampa Electric Company.

4. Please construe "and" as well as "or" either disjunctively or conjunctively as necessary to bring within the scope of this production of documents any document which might otherwise be construed to be outside the scope.

## DOCUMENTS REQUESTED

30. Produce all documents which discuss the solicitation of bids for waterborne transportation of solid fuels to Tampa Electric's generating stations near Tampa, Florida, which was issued in June of 2003.
  
31. Produce all documents which discuss the hiring of any consultants to assist in the evaluation of bids received in relation to the waterborne transportation of solid fuels to Tampa Electric's generating stations near Tampa Florida which was issued in June of 2003.
  
32. Produce all documents which discuss or evaluate the merits of integrated waterborne transportation services as opposed to segmented services. Such terms are used in the same sense as bid solicitation WB-2004, solid fuel transportation and terminal services, issued June 2003.
  
33. Produce all documents which discuss the relationship of the bid solicitation issued in June of 2003 and the proposed sale of TECO Transport.
  
34. Produce all documents which discuss any transportation alternatives not included within the solicitation of bids for waterborne transportation.
  
35. Produce all documents which discuss the revenue impact that award/non-award of the solicitation of bids for waterborne transportation of solid fuels to Tampa Electric generation stations near Tampa, Florida, which was issued in June 2003, would have on TECO Energy and/or Tampa Electric.
  
36. Produce all documents which discuss regulatory strategies or issues related to the solicitation of bids for waterborne transportation of solid fuels to Tampa Electric generating stations near Tampa, Florida which was issued in June, 2003.

**CERTIFICATE OF SERVICE  
DOCKET NO. 030001-EI**

I HEREBY CERTIFY that a true and correct copy of the above and foregoing Notice of Service of Citizens' Third Set of Production of Documents to Tampa Electric Company has been furnished by U.S. Mail or \*hand delivery to the following parties on this 21st day of July, 2003.

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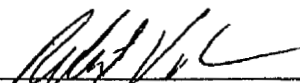
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