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RECEIVED-FPSC

03 OCT -2 AM 9:58

Of COMMISSION
DAVISSON F. DUNLAP
CLERK

October 1, 2003

Ms. Blanca S. Bayo, Director
Division of the Commission Clerk
& Administrative Services
Capital Circle Office Center
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

DISTRIBUTION CENTER
03 OCT -2 AM 8:31

Re: Territorial Dispute Between City of Bartow
and Tampa Electric Company ("TECO")
Case No. 011333-EU

Dear Ms. Bayo:

Enclosed with this letter are the following pleadings:

- 1. Original and 16 copies of Bartow's Amended Motion to Compel Tampa Electric to Respond to Discovery Requests, and Motion for Sanctions.
- 09505-032. Original and 16 copies of Memorandum in Support of Bartow's Amended Motion to Compel Tampa Electric to Respond to Discovery Requests, and Motion for Sanctions.

Please file the original of each pleading in the Commission's file for this matter. Please then stamp one copy of each with the date and time filed and return them to me in the enclosed stamped, addressed envelope.

Thank you for your assistance.

RECEIVED & FILED

1h
FPSC-BUREAU OF RECORDS

Sincerely yours,

Davisson F. Dunlap, Jr.
Davisson F. Dunlap, Jr.

AUS	_____
CAF	_____
CMP	_____
COM	5 _____
CTR	_____
ECR	_____
GCL	_____
OPC	_____
MMS	_____
SEC	I _____
OTH	_____

Enclosures
cc Mr. Richard A. Williams

DOCUMENT NUMBER-DATE

09504 OCT-28

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of City of Bartow, Florida,
Regarding a Territorial Dispute with Tampa
Electric Company, Polk County, Florida.

DOCKET No. 011333-EU
Filed: _____

**CITY OF BARTOW'S AMENDED MOTION TO COMPEL
TAMPA ELECTRIC TO RESPOND TO
DISCOVERY REQUESTS, AND MOTION FOR SANCTIONS**

Petitioner, City of Bartow, Florida ("Bartow"), by and through its undersigned attorneys, hereby moves that the Florida Public Service Commission compel Respondent, Tampa Electric Company ("TECO") to respond to discovery requests and to impose sanctions; and in support of this motion, Bartow states as follows:

1. Bartow submitted its first set of interrogatories to TECO on or about November 8, 2001. Bartow submitted its second set of interrogatories to TECO on or about April 12, 2002.
2. On December 15, 2001, TECO served a partial response to Bartow's first set of interrogatories, which response included several objections to information requested.
3. TECO'S answers to Bartow's second set of interrogatories were due by May 17, 2002. TECO has to this date not responded to Bartow's second set of interrogatories.
4. Bartow submitted its first request to produce to TECO on or about April 12, 2002.
5. TECO's response to Bartow's request to produce was due by May 17, 2002. TECO has to this date not responded to Bartow's request to produce and has produced no documents.

DOCUMENT NUMBER-DATE

09504 OCT-28

FPSC-COMMISSION CLERK

The grounds for the motion are as follows:

1. The partial responses of TECO to Bartow's first set of interrogatories, their objections and the information withheld due to its partial responses are without legal basis. The information requested and the objections are on matters that can be inquired into under Florida Rule of Civil Procedure 1.340(b) and 1.280(b). They are relevant to the subject matter of the pending action and call for the identity and location of persons having knowledge of discoverable information under Florida Rule of Civil Procedure 1.280(b).

2. With respect to the failure of TECO to respond to Bartow's second set of interrogatories and to Bartow's first request to produce, there is no legal excuse for failure to respond. TECO failed to file any objections or a motion for protective order on these discovery requests. Under Florida Rules of Civil Procedure 1.340 and 1.351, without objections or failure to file for protective order, the response to these motions were due within 30 days after service of the interrogatories and request to produce.

3. Reliance upon the Florida Public Service Commission ("Commission") staff's advisory that the current procedural schedule would be temporarily suspended is not a valid legal excuse to fail to respond as required by the Florida Rules of Civil Procedure.

4. At the time Bartow filed these discovery motions, a Commission order establishing procedure dated April 2, 2002, was in effect. (See attached Exhibit A.) This order contains no provision that there is a suspension or postponement of the requirements of the Florida Rules of Civil Procedure when the current procedural schedule is temporarily suspended by the Commission staff. The only part of that order establishing procedure which deals with discovery provides that, if the respondent intends to object to discovery requests, the objection shall be made within ten days after service of the discovery request, rather than the 30 days provided in the Florida Rules of Civil Procedure.

5. The Florida Administrative Code, Chapter 28-106.206, provides that parties may obtain discovery through the means and manner provided in Florida Rules of Civil Procedure 1.280 through 1.400. (See attached Exhibit B.)

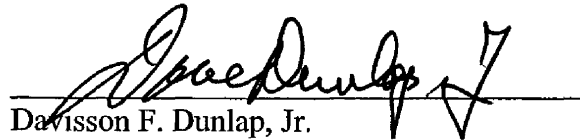
6. The Florida Administrative Code, Practice and Procedure of the Public Service Commission, Chapter 25-22.033(1), provides that communications between Commission employees and parties in docketed proceedings before the Commission is not intended to modify or supersede the procedural requirements for formal discovery under the applicable provisions of the Florida Rules of Civil Procedure. (See attached Exhibit C.) Therefore, the communication from the Commission staff advising that the current procedural schedule was temporarily suspended did not modify or supersede the requirement of the Florida Rules of Civil Procedure for responses to discovery requests.

7. Pursuant to the Chapter 25-22.033 and lack of any provision in the order of procedure dated April 2, 2002, or order of any other date of the Commission, there is no legal basis for the advisory from the Commission staff that the current procedural schedule would be temporarily suspended pending the Commission's consideration of Bartow's motion for continuance to postpone the timetable in the Florida Rules of Civil Procedure for responses to Bartow's interrogatories or motions to compel production of documents.

8. Under the Florida Rules of Civil Procedure, TECO's answers to the second set of interrogatories and the first request to produce of Bartow were due on May 17, 2002. There is no legal rule or legal basis upon which TECO can claim a legal excuse for its failure to respond, particularly since it did not file any objection or motion for protective order as to Bartow's discovery requests.

WHEREFORE, Petitioner, City of Bartow, Florida, requests that the Florida Public Service Commission issue its order requiring Tampa Electric Company to furnish complete

answers to all interrogatories submitted by Bartow and to produce all documents requested in Bartow's request to produce. Bartow further requests the imposition of sanctions upon TECO for its failure to respond completely in a timely manner to the discovery requests made by Bartow.

A handwritten signature in black ink, appearing to read "Davisson F. Dunlap, Jr.", is written over a horizontal line.

Davisson F. Dunlap, Jr.
Florida Bar Number 0136730
DUNLAP & TOOLE, P.A.
2057 Delta Way
Tallahassee, FL 32303-4227
850-385-5000
850-385-7636 Facsimile

Attorneys for Petitioner, City of Bartow

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing City of Bartow's Motion to Amended Compel Tampa Electric to Respond to Discovery Requests, and Motion for Sanctions, has been furnished by United States mail on this 12th day of ~~September~~ Oct, 2003, to:


Mr. Harry W. Long, Jr.
Assistant General Counsel
Tampa Electric Company
Post Office Box 111
Tampa, FL 33601

Ms. Adrienne Vining
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0863

Mr. Lee L. Willis
Mr. James D. Beasley
Ausley & McMullen
Post Office Box 391
Tallahassee, FL 32302

Attorney for Florida Public Service
Commission

Attorneys for Tampa Electric Company



Attorney

4-2

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of City of
Bartow to modify territorial
agreement or, in the
alternative, to resolve
territorial dispute with Tampa
Electric Company in Polk County.

DOCKET NO. 011333-EU
ORDER NO. PSC-02-0442-PCO-EU
ISSUED: April 2, 2002

ORDER ESTABLISHING PROCEDURE

On October 4, 2001, the City of Bartow, Florida (Bartow), filed a petition to modify the territorial agreement or, in the alternative, to resolve a territorial dispute between Bartow and Tampa Electric Company (TECO). A hearing is scheduled for July 18, 2002.

This Order is issued pursuant to the authority granted by Rule 28-106.211, Florida Administrative Code, which provides that the presiding officer before whom a case is pending may issue any orders necessary to effectuate discovery, prevent delay, and promote the just, speedy, and inexpensive determination of all aspects of the case.

The scope of this proceeding shall be based upon the issues raised by the parties and Commission staff (staff) up to and during the prehearing conference, unless modified by the Commission. The hearing will be conducted according to the provisions of Chapter 120, Florida Statutes, and all administrative rules applicable to this Commission.

Discovery

When discovery requests are served and the respondent intends to object to or ask for clarification of the discovery request, the objection or request for clarification shall be made within ten days of service of the discovery request. This procedure is intended to reduce delay in resolving discovery disputes.

The hearing in this docket is set for July 18, 2002. Unless authorized by the Prehearing Officer for good cause shown, all discovery shall be completed by Monday, July 8, 2002. All

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interrogatories, requests for admissions, and requests for production of documents shall be numbered sequentially in order to facilitate their identification. The discovery requests will be numbered sequentially within a set and any subsequent discovery requests will continue the sequential numbering system. Pursuant to Rule 28-106.206, Florida Administrative Code, unless subsequently modified by the Prehearing Officer, the following shall apply: interrogatories, including all subparts, shall be limited to 100, requests for production of documents, including all subparts, shall be limited to 100, and admissions, including all subparts, shall be limited to 100.

Any information provided pursuant to a discovery request for which proprietary confidential business information status is requested shall be treated by the Commission and the parties as confidential. The information shall be exempt from Section 119.07(1), Florida Statutes, pending a formal ruling on such request by the Commission, or upon the return of the information to the person providing the information. If no determination of confidentiality has been made and the information has not been made a part of the evidentiary record in the proceeding, it shall be returned expeditiously to the person providing the information. If a determination of confidentiality has been made and the information was not entered into the record of the proceeding, it shall be returned to the person providing the information within the time period set forth in Section 366.093, Florida Statutes.

Diskette Filings

See Rule 25-22.028(1), Florida Administrative Code, for the requirements of filing on diskette for certain utilities.

Prefiled Testimony and Exhibits

Each party shall prefile, in writing, all testimony that it intends to sponsor. Such testimony shall be typed on 8 ½ inch x 11 inch transcript-quality paper, double spaced, with 25 numbered lines, on consecutively numbered pages, with left margins sufficient to allow for binding (1.25 inches).

Each exhibit intended to support a witness' prefiled testimony shall be attached to that witness' testimony when filed, identified

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by his or her initials, and consecutively numbered beginning with 1. All other known exhibits shall be marked for identification at the prehearing conference. After an opportunity for opposing parties to object to introduction of the exhibits and to cross-examine the witness sponsoring them, exhibits may be offered into evidence at the hearing. Exhibits accepted into evidence at the hearing shall be numbered sequentially. The pages of each exhibit shall also be numbered sequentially prior to filing with the Commission.

An original and 15 copies of all testimony and exhibits shall be prefiled with the Director, Division of the Commission Clerk and Administrative Services, by the close of business, which is 5:00 p.m., on the date due. A copy of all prefiled testimony and exhibits shall be served by mail or hand delivery to all other parties and staff no later than the date filed with the Commission. Failure of a party to timely prefile exhibits and testimony from any witness in accordance with the foregoing requirements may bar admission of such exhibits and testimony.

Prehearing Statement

All parties in this docket shall file a prehearing statement. Staff will also file a prehearing statement. The original and 15 copies of each prehearing statement shall be prefiled with the Director of the Division of the Commission Clerk and Administrative Services by the close of business, which is 5:00 p.m., on the date due. A copy of the prehearing statement shall be served on all other parties and staff no later than the date it is filed with the Commission. Failure of a party to timely file a prehearing statement shall be a waiver of any issue not raised by other parties or by the Commission. In addition, such failure shall preclude the party from presenting testimony in support of its position. Such prehearing statements shall set forth the following information in the sequence listed below.

- (a) The name of all known witnesses that may be called by the party, and the subject matter of their testimony;
- (b) a description of all known exhibits that may be used by the party, whether they may be identified on a composite basis, and the witness sponsoring each;

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- (c) a statement of basic position in the proceeding;
- (d) a statement of each question of fact the party considers at issue, the party's position on each such issue, and which of the party's witnesses will address the issue;
- (e) a statement of each question of law the party considers at issue and the party's position on each such issue;
- (f) a statement of each policy question the party considers at issue, the party's position on each such issue, and which of the party's witnesses will address the issue;
- (g) a statement of issues that have been stipulated to by the parties;
- (h) a statement of all pending motions or other matters the party seeks action upon;
- (i) a statement identifying the parties' pending requests or claims for confidentiality; and
- (j) a statement as to any requirement set forth in this order that cannot be complied with, and the reasons therefore.
- (k) Any objections to a witness's qualifications as an expert must be identified in a party's Prehearing Statement. Failure to identify such objection may result in restriction of a party's ability to conduct voir dire.

Prehearing Conference

Pursuant to Rule 28-106.209, Florida Administrative Code, a prehearing conference will be held June 27, 2002, at the Betty Easley Conference Center, 4075 Esplanade Way, Tallahassee, Florida. Any party who fails to attend the prehearing conference, unless excused by the Prehearing Officer, will have waived all issues and positions raised in that party's prehearing statement.

Prehearing Procedure: Waiver of Issues

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Any issue not raised by a party prior to the issuance of the prehearing order shall be waived by that party, except for good cause shown. A party seeking to raise a new issue after the issuance of the prehearing order shall demonstrate that: it was unable to identify the issue because of the complexity of the matter; discovery or other prehearing procedures were not adequate to fully develop the issue; due diligence was exercised to obtain facts touching on the issue; information obtained subsequent to the issuance of the prehearing order was not previously available to enable the party to identify the issue; and introduction of the issue could not be to the prejudice or surprise of any party. Specific reference shall be made to the information received, and how it enabled the party to identify the issue.

Unless a matter is not at issue for that party, each party shall diligently endeavor in good faith to take a position on each issue prior to issuance of the prehearing order. When a party is unable to take a position on an issue, it shall bring that fact to the attention of the Prehearing Officer. If the Prehearing Officer finds that the party has acted diligently and in good faith to take a position, and further finds that the party's failure to take a position will not prejudice other parties or confuse the proceeding, the party may maintain "no position at this time" prior to hearing and thereafter identify its position in a post-hearing statement of issues. In the absence of such a finding by the Prehearing Officer, the party shall have waived the entire issue. When an issue and position have been properly identified, any party may adopt that issue and position in its post-hearing statement.

Document Identification

To facilitate the management of documents in this docket, exhibits will be numbered at the Prehearing Conference. Each exhibit submitted shall have the following in the upper right-hand corner: the docket number, the witness's name, the word "Exhibit" followed by a blank line for the exhibit number and the title of the exhibit.

An example of the typical exhibit identification format is as follows:

Docket No. 12345-TL
J. Doe Exhibit No. _____
Cost Studies for Minutes of Use by Time of Day

Controlling Dates

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The following dates have been established to govern the key activities of this case.

1)	Utility's direct testimony and exhibits	May 20, 2002
2)	Rebuttal testimony and exhibits	June 10, 2002
3)	Prehearing Statements	June 14, 2002
4)	Prehearing Conference	June 27, 2002
5)	Discovery Complete	July 8, 2002
6)	Hearing	July 18, 2002
7)	Briefs	August 15, 2002

Use of Confidential Information At Hearing

It is the policy of this Commission that all Commission hearings be open to the public at all times. The Commission also recognizes its obligation pursuant to Section 366.093, Florida Statutes, to protect proprietary confidential business information from disclosure outside the proceeding. Any party wishing to use any proprietary confidential business information, as that term is defined in Section 366.093, Florida Statutes, shall notify the Prehearing Officer and all parties of record by the time of the Prehearing Conference, or if not known at that time, no later than seven (7) days prior to the beginning of the hearing. The notice shall include a procedure to assure that the confidential nature of the information is preserved as required by statute. Failure of any party to comply with the seven-day requirement described above shall be grounds to deny the party the opportunity to present evidence which is proprietary confidential business information.

When confidential information is used in the hearing, parties must have copies for the Commissioners, necessary staff, and the Court Reporter, in envelopes clearly marked with the nature of the contents. Any party wishing to examine the confidential material that is not subject to an order granting confidentiality shall be provided a copy in the same fashion as provided to the Commissioners, subject to execution of any appropriate protective agreement with the owner of the material. Counsel and witnesses

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are cautioned to avoid verbalizing confidential information in such a way that would compromise the confidential information. Therefore, confidential information should be presented by written exhibit when reasonably possible to do so. At the conclusion of that portion of the hearing that involves confidential information, all copies of confidential exhibits shall be returned to the proffering party. If a confidential exhibit has been admitted into evidence, the copy provided to the Court Reporter shall be retained in the Division of the Commission Clerk and Administrative Services' confidential files.

Post-Hearing Procedure

Each party shall file a post-hearing statement of issues and positions. A summary of each position of no more than 50 words, set off with asterisks, shall be included in that statement. If a party's position has not changed since the issuance of the prehearing order, the post-hearing statement may simply restate the prehearing position; however, if the prehearing position is longer than 50 words, it must be reduced to no more than 50 words. If a party fails to file a post-hearing statement in conformance with the rule, that party shall have waived all issues and may be dismissed from the proceeding.

Pursuant to Rule 28-106.215, Florida Administrative Code, a party's proposed findings of fact and conclusions of law, if any, statement of issues and positions, and brief, shall together total no more than 40 pages, and shall be filed at the same time.

Based upon the foregoing, it is

ORDERED by Commissioner Braulio L. Baez, as Prehearing Officer, that the provisions of this Order shall govern this proceeding unless modified by the Commission.

By ORDER of Commissioner Braulio L. Baez, as Prehearing Officer, this 2nd day of April, 2002.

/s/ Braulio L. Baez
BRAULIO L. BAEZ
Commissioner and Prehearing Officer

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This is a facsimile copy. Go to the
Commission's Web site,
<http://www.floridapsc.com> or fax a request
to 1-850-413-7118, for a copy of the order
with signature.

(S E A L)

AEV

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing or judicial review of Commission orders that is available under Sections 120.57 or 120.68, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing or judicial review will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

Any party adversely affected by this order, which is preliminary, procedural or intermediate in nature, may request: (1) reconsideration within 10 days pursuant to Rule 25-22.0376, Florida

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Administrative Code, if issued by a Prehearing Officer; (2) reconsideration within 15 days pursuant to Rule 25-22.060, Florida Administrative Code, if issued by the Commission; or (3) judicial review by the Florida Supreme Court, in the case of an electric, gas or telephone utility, or the First District Court of Appeal, in the case of a water or wastewater utility. A motion for reconsideration shall be filed with the Director, Division of the Commission Clerk and Administrative Services, in the form prescribed by Rule 25-22.060, Florida Administrative Code. Judicial review of a preliminary, procedural or intermediate ruling or order is available if review of the final action will not provide an adequate remedy. Such review may be requested from the appropriate court, as described above, pursuant to Rule 9.100, Florida Rules of Appellate Procedure.

**FLORIDA ADMINISTRATIVE CODE ANNOTATED
TITLE 28. ADMINISTRATION COMMISSION
CHAPTER 28-106. DECISIONS DETERMINING
SUBSTANTIAL INTERESTS
PART II. HEARINGS INVOLVING DISPUTED
ISSUES OF MATERIAL FACT**

Current through August 1, 2003.

28-106.206. Discovery.

After commencement of a proceeding, parties may obtain discovery through the means and in the manner provided in Rules 1.280 through 1.400, Florida Rules of Civil Procedure. The presiding officer may issue appropriate orders to effectuate the purposes of discovery and to prevent delay, including the imposition of sanctions in accordance with the Florida Rules of Civil Procedure, except contempt.

Specific Authority 120.54(5) FS. Law Implemented
120.569, 120.57 FS. History--New 4-1-97.

28 FL ADC 28-106.206
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FLORIDA ADMINISTRATIVE CODE ANNOTATED
TITLE 25. PUBLIC SERVICE COMMISSION
CHAPTER 25-22. RULES GOVERNING PRACTICE
AND PROCEDURE
PART IV. DECISIONS DETERMINING
SUBSTANTIAL INTERESTS
SUBPART A. GENERAL PROVISIONS

Current through August 1, 2003.

25-22.033. Communications Between Commission Employees and Parties.

The Commission recognizes that Commission employees must exchange information with parties who have an interest in Commission proceedings. However, the Commission also recognizes that all parties to adjudicatory proceedings need to be notified and given an opportunity to participate in certain communications. The intent of this rule is not to prevent or hinder in any way the exchange of information, but to provide all parties to adjudicatory proceedings notification of and the opportunity to participate in certain communications.

(1) This rule shall govern communications between Commission employees and parties to docketed proceedings before the Commission. This rule shall not apply in proceedings under sections 120.54, 120.565, 367.0814, Fla. Stat., proposed agency action proceedings before the Commission has voted to issue a proposed agency action order, non-rate case tariffs, workshops or internal affairs meetings. Also exempted are docketed and undocketed audits, telephone service evaluations, and electric and gas safety inspections. Nothing in this rule is intended to modify or supersede the procedural requirements for formal discovery under the Commission's rules and applicable provisions of the Florida Rules of Civil Procedure, or affect communications regarding discovery requests, procedure, or other matters not concerned with the merits of a case.

(2) Written Communications -- Notice of any written communication between Commission employees and parties shall be transmitted to all other parties at the same time as the written communication, whether by U.S. Mail or other means.

(3) Scheduled Meetings and Conference Calls -- All parties to the proceeding shall be given reasonable notice of the time and place of any scheduled meeting or conference call between Commission employees and parties. For purposes of this subsection, a conference call is defined as a telephone call involving three or more persons.

(4) Response to Communications -- Any party to a proceeding may prepare a written response to any

communication between a Commission employee and another party. Notice of any such response shall be transmitted to all parties.

(5) Prohibited Communications -- No Commission employee shall directly or indirectly relay to a Commissioner any communication from a party or an interested person which would otherwise be a prohibited ex parte communication under section 350.042, Fla. Stat. Nothing in this subsection shall preclude non-testifying advisory staff members from discussing the merits of a pending case with a Commissioner, provided the communication is not otherwise prohibited by law. However, a staff member who testifies in a case shall not discuss the merits of that case with any Commissioner during the pendency of that case.

Specific Authority 350.01(7), 350.127(2) FS. Law Implemented 120.569, 120.57, 350.042 FS. History--New 3-24-93.

ANNOTATIONS

Recusal

The commissioner denied the motion to disqualify and recuse and to refer the docket to DOAH for all further proceedings. The motion failed to allege any legally sufficient facts to support the commissioner's recusal for violation of Section 366.042, F.S., and subsection 25-22.033(5), F.A.C. In re: Petition by BellSouth Telecommunications, Inc. for arbitration of certain issues in interconnection agreement with Supra Telecommunications and Information Systems, Inc., 02 FPSC 6:39 (2002).

25 FL ADC 25-22.033
END OF DOCUMENT