

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Tampa Electric Company's
2004-2008 waterbound transportation
contract with TECO transport and trade

Docket No. 031033-EI

Filed: December 3, 2003

**CITIZENS FIRST SET OF INTERROGATORIES
TO TAMPA ELECTRIC COMPANY (NOS. 1-14)**

Please take notice that the Citizens served the original and one copy of interrogatories (Nos. 1-14) to Tampa Electric Company on December 3, 2003.

The interrogatories are to be answered under oath by Tampa Electric Company and the answers are to be given in writing immediately following the question to which it responds. Thereafter, the original of the interrogatories, together with the answers, is to be served on the Citizens at the Office of Public Counsel, c/o the Florida Legislature, 111 West Madison Street, Claude Pepper Building, Room 812, Tallahassee, Florida 32399-1400, and copies to be served on all parties in accordance with applicable Rules of Civil Procedure.

INTERROGATORIES

1. Who in the Tampa Electric chain of command decided to issue the Request for Proposals? State the date, purpose and persons attending discussions regarding the issuance of the RFP.
 - a. When was the decision made?
 - b. Was the decision subject to approval by John Ramil and/or a committee of managers? If so, give the date of approval and attendees at the meeting granting such approval.

DOCUMENT NUMBER-DATE

12320 DEC-3 8

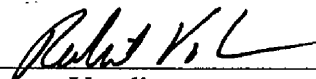
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- c. Were minutes kept of the meeting?
2. What were the reasons for the departure of Mr. Hugh Smith?
 - a. What was his date of separation?
 - b. What organizational changes resulted from the departure of Mr. Smith?
3. Has Tampa Electric engaged in discussions with the railroad bidder here in the past five years independent of this Request for Proposals? Please detail the nature of the discussion, the date of the discussions, and disposition.
4. Please explain in detail how the river transportation model utilized by Mr. Dibner for river transportation was developed.
 - a. Has the river transportation model or a variant of the model even been used in a regulatory proceeding? If so, identify the proceeding by case number, jurisdiction, date, disposition and the use to which the model was put forth in the proceeding.
 - b. Is the river transportation model subject to any sort of copyright or trademark type protection?
 - c. What are the five most critical variables, in descending order, in the river transportation model?
5. Please explain in detail how the ocean transportation model was developed.
 - a. Is the ocean transportation model designed exclusively for Tampa Electric Company?
 - b. Has the ocean transportation model or a variation of the model even been used in a regulatory proceeding? If so, identify the proceeding by case number, jurisdiction, date, disposition and the use to which the model was put forth in the proceeding.
 - c. Is the ocean transportation model subject to any sort of copyright or trademark protection?
 - d. What are the five most critical variables in descending order, of the ocean

transportation model?

6. Which facets of each model require the greatest element of judgment of the modeler?
7. Are there any aspects of the model not subject to dispute such as towboat costs which could be the subject of a stipulation?
8. How do cost models compare to actual costs to provide a given service?
9. Given Mr. Dibner's conclusion in the testimony filed on September 25, 2003, regarding the ocean segment at page 20, line 21-25, does TECO Transport have a de facto monopoly over the coal transportation at issue in this proceeding?
10. Please list the name of each TECO Transport vessel that delivered coal or fuel to Tampa Electric in the past three years.
 - a. For each vessel, provide the following information, year built, cost new, depreciated value.
11. Provide any and all administrative and general overhead expenses necessary to operate TECO Transport on an annual basis.
12. Please provide any and all operational and maintenance expenses necessary to operate TECO Transport on an annual basis.
13. Provide any and all capital costs necessary to operate TECO Transport on an annual basis.
14. Given the RFP process for 850,000ton/year for January 2005 through December 2014, announced in Coal Daily on December 2, 2003, what is the status of the "potential for significant declines in the volume of Tampa Electric's future demand for coal transportation" (Dibner, 09/12/03, p. 23 at lines 20-21) under the contract with TECO

Transport?



Robert Vandiver
Associate Public Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail on this 3rd day of December, 2003, to the following:

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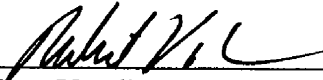
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