AUSLEY & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

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

October 13, 2008

HAND DELIVERED

Ms. Ann Cole, Director Office of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re:

Petition for Rate Increase by Tampa Electric Company

FPSC Docket No. 080317-EI

Dear Ms. Cole:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Responses and Objections to Florida Industrial Power Users Group's First Request for Production of Documents (Nos. 1-37).

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

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase)	DOCKET NO. 080317-EI
by Tampa Electric Company.)	
)	FILED: October 13, 2008

TAMPA ELECTRIC COMPANY'S RESPONSES AND OBJECTIONS TO FLORIDA INDUSTRIAL POWER USERS GROUP'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-37)

Tampa Electric Company ("Tampa Electric" or the "company"), submits the following objections and responses to FIPUG's First Request for Production of Documents (Nos. 1-37).

- 1. Tampa Electric adopts and incorporates herein by reference each and every general objection and specific objection to FIPUG's First Request for Production of Documents (Nos. 1-37) and First Set of Interrogatories (Nos. 1-37) set forth in the company's preliminary response and objections filed in this proceeding on October 2, 2008.
- 2. Subject to the foregoing objections, the company responds to FIPUG's First Request for Production of Documents by stating that the company is producing documents responsive to FIPUG's POD Nos. 1-37 (with the exception of POD Nos. 5, 12 and 26-28), and will make available at a date and time mutually convenient for FIPUG and Tampa Electric at the offices of Ausley & McMullen in Tallahassee, Florida confidential responses to PODs 5, 12.
- 3. Subject to the foregoing objections, Tampa Electric is answering FIPUG's First Set of Interrogatories (Nos. 1-37) via separate pleading.

WHEREFORE, Tampa Electric submits the foregoing objections and responses to FIPUG's First Set of Interrogatories (Nos. 1-37) and First Request for Production of Documents (Nos. 1-37).

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FPSC-COMMISSION CLERK

DATED this 23 day of October, 2008.

Respectfully submitted,

LEE L. WILLIS

JAMES D. BEASLEY

KENNETH R. HART

J. JEFFRY WAHLEN

Ausley & McMullen

Post Office Box 391

Tallahassee, FL 32302

(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE DOCKET NO. 080317-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing Responses and Objections to FIPUG's First Request for Production of Documents (Nos. 1-37), filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (*) on this 13 day of October, 2008, to the following:

Keino Young/Martha Brown*
Jennifer Brubaker/Jean Hartman
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Vicki Gordon Kaufman* Jon C. Moyle, Jr. Anchors Smith Grimsley 118 North Gadsden Street Tallahassee, FL 32301

J. R. Kelly/Patricia A. Christensen Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 John W. McWhirter, Jr. McWhirter, Reeves & Davidson, P.A. Post Office Box 3350 Tampa, FL 33601-3350

Robert Scheffel Wright John T. LaVia, III Young van Assenderp, P.A. 225 South Adams Street, Suite 200 Tallahassee, FL 32301

ATTORNEY

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