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

November 17, 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 Response to the Florida Industrial Power Users Group's Sixth Request for Production of Documents (Nos. 44 - 48), propounded and served by electronic and U. S. Mail on October 17, 2008.

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.) CLK

SSC

DOCUMENT NUMBER-DATE

10693 NOV 17 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase)	DOCKET NO. 080317-EI
by Tampa Electric Company.)	
)	FILED: November 17, 2008

TAMPA ELECTRIC COMPANY'S RESPONSE TO THE FLORIDA INDUSTRIAL POWER USERS GROUP'S FIFTH REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 44 - 48)

Tampa Electric Company ("Tampa Electric" or the "company"), pursuant to Rule 1.350(b), Florida Rules of Civil Procedure, submits this its Response to the Florida Industrial Power Users Group's Fifth Request for Production of Documents (Nos. 44 - 48), saying that the company has this date furnished FIPUG such requested documents.

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

DOCUMENT NUMBER-DATE

10693 NOV 17 8

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Response to FIPUG's Sixth Request for the Production of Documents (Nos. 44 - 48), filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (*) on this 17 day of November, 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

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

Robert Scheffel Wright John T. LaVia, III Young van Assenderp, P.A. 225 South Adams Street, Suite 200 Tallahassee, FL 32301 Vicki Gordon Kaufman* Jon C. Moyle, Jr. Anchors Smith Grimsley 118 North Gadsden Street Tallahassee, FL 32301

John W. McWhirter, Jr. McWhirter, Reeves & Davidson, P.A. Post Office Box 3350 Tampa, FL 33601-3350

Mr. Michael B. Twomey Post Office Box 5256 Tallahassee, FL 32314-5256

ATTORNEY

BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

In re: Tampa Electric Company's)	DOCKET NO. 080317-EI
Petition for an Increase in Base)	FILED: NOVEMBER 17, 2008
Rates and Miscellaneous Service)	,
Charges.	•	

TAMPA ELECTRIC COMPANY'S ANSWERS TO SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 44 - 48) OF THE

FLORIDA INDUSTRIAL POWER USERS GROUP

Tampa Electric files its Answers to Production of Documents (Nos. 44 - 48) propounded and served on October 17, 2008, by the Florida Industrial Power Users Group.

TAMPA ELECTRIC COMPANY DOCKET NO. 080317-EI INDEX TO FIPUG'S SIXTH REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 44 - 48)

Number	Subject	Bates Stamped Page
44	Provide a copy of all instructions and procedures regarding curtailment/interruption of IS-1, IS-3, GSLM-2 and GSLM-3 customers.	1
45	Provide in native (excel) format Exhibit HTB-2 filed in Florida Public Service Commission Docket No. 080002-EG and all supporting work papers.	128
46	With reference to the Direct Testimony of Mr. Ashburn, at page 55, lines 24-25, where he indicates that rate schedules IS-1 and IS-3 "are no longer cost effective," provide all documents and studies the Company has that address the cost-effectiveness of those rate schedules.	129
47	Provide a copy of the Company's methodology for "determining the cost effectiveness of non-firm load over its generation planning horizon, pursuant to the definition of "cost effective" in paragraph (3)(c)" of Rule 25-6.0438, Florida Administrative Code.	130
48	Provide a copy of the Company's analysis pursuant to Rule 25-6.0438, Florida Administrative Code, determining whether Rate Schedule IS-1 and IS-3 are or are no longer cost effective.	162