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June 11, 2013

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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. 130040-EI

Dear Ms. Cole:


Enclosed for filing in the above docket are the original and fifteen (15) copies of each of the following:

1. Tampa Electric Company's Request for Clarification of WCF Hospital Utility Alliance's First Set of Interrogatories to Tampa Electric Company (Nos. 1-131).
2. Tampa Electric Company's Specific Objections to WCF Hospital Utility Alliance's Second Set of Document Requests (Nos. 11-149) to Tampa Electric Company.

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

COM _____
AFD 1
APA 1
ECO 12
ENG _____
GCL 1 JDB/pp
IDM _____ Enclosures
TEL _____
CLK _____ cc: All Parties of Record (w/encls.)

DOCUMENT NUMBER - DATE

03222 JUN 11 2013

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase)
by Tampa Electric Company.)
_____)

DOCKET NO. 130040-EI

FILED: June 11, 2013

**TAMPA ELECTRIC COMPANY'S REQUEST FOR CLARIFICATION
OF WCF HOSPITAL UTILITY ALLIANCE'S FIRST SET OF
INTERROGATORIES TO TAMPA ELECTRIC COMPANY (NOS. 1-131)**

Tampa Electric Company ("Tampa Electric" or "the company") pursuant to the Order Establishing Procedure¹, requests clarification of Interrogatories Nos. 96 and 98 set forth in the First Set of Interrogatories of WCF Hospital Utility Alliance's ("HUA's") to Tampa Electric Company dated June 5, 2013 and, says:

1. Tampa Electric seeks clarification as to the intended timeframes set forth in HUA's Interrogatories Nos. 96 and 98.
2. Interrogatory No. 96 refers to the timeframe 1992-1212 and Interrogatory No. 98 refers to the timeframe from 2014-2012. Obviously the timeframes are in error and Tampa Electric requests that HUA clarify the intended timeframes.

WHEREFORE, Tampa Electric submits the foregoing request for clarification of HUA Interrogatories Nos. 96 and 98.

¹ Order No. PSC-13-0150-PCO-EI

DOCUMENT NUMBER-DATE
03222 JUN 11 2013
FPSC-COMMISSION CLERK

DATED this 11th day of June 2013.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Clarification of HUA's First Set of Interrogatories (Nos. 96 and 98), filed on behalf of Tampa Electric Company, was served by email, hand delivery(*) or U. S. Mail on this 11th day of June, 2013 to the following:

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ATTORNEY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase)
by Tampa Electric Company.)
_____)

DOCKET NO. 130040-EI
FILED: June 11, 2013

**TAMPA ELECTRIC COMPANY'S SPECIFIC OBJECTIONS
TO WCF HOSPITAL UTILITY ALLIANCE'S SECOND SET OF
DOCUMENT REQUESTS (NOS. 11-149) TO TAMPA ELECTRIC COMPANY**

Tampa Electric Company ("Tampa Electric" or "the company") makes the following specific objections to certain of WCF Hospital Utility Alliance's ("HUA's") Second Set of Document Requests (Nos. 11-149) to Tampa Electric Company, filed June 5, 2013:

1. Tampa Electric objects to POD No. 74 which reads as follows:

74. Regarding Ashburn at 25:17-27:19 Please provide all documents including all work papers and excel spreadsheets, with all cells, links, formulae and data intake, that discuss and/or reflect the use of a method for classifying distribution costs on Tampa Electric's system, other than the MDS method, prepared by, or for, Tampa Electric during the past five years.

Basis for Objection: Tampa Electric objects Request No. 74 on the ground that the request is overbroad and attempting to sift through five years' worth of unrestricted documents in search of documents which "discuss and/or reflect" the use of any particular method for classifying distribution costs is overbroad. Any attempt by Tampa Electric to respond would be unduly burdensome. It would take an enormous amount of time for Tampa Electric personnel to comb through literally thousands of pages of documents in an effort to cull those documents that are responsive to this request. Each document would have to be renamed in order to flow through Tampa Electric's system and a look up table would have to be created in order to make the resulting documents useable and,

at the same time, preserve the integrity of the original documents. Such an undertaking would pull Tampa Electric employees away from their normal duties, threaten their ability to comply with the demands of an ongoing FERC audit and continuing FPSC regulatory obligations. Moreover, the effort would be duplicative without providing any incremental probative value for the enormous effort involved. Over the last five years Tampa Electric has not changed the methodology used in performing cost of service studies. The methodology used by the company to classify distribution costs on Tampa Electric's system prior to the methodology used in this case has been the same each year and has not incorporated the MDS method. If HUA is amenable to selecting any one of the last five years, upon Tampa Electric's representation to HUA that the classification methodology was the same for each year, Tampa Electric could provide the requested documents for that year. This compromise would still be burdensome but the burden would be five times less and just as valuable to HUA from an evidentiary standpoint, given the fact that the classification methodology was the same for each year.

2. Tampa Electric objects to POD No. 78 which reads as follows:

78. Regarding Ashburn at 31:7-9. Please produce all documents dated January 1, 2004 or later, that discuss plans, factors to consider and/or reasons for constructing new, or converting existing, power plants on Tampa Electric's System.

Basis for Objection: Tampa Electric objects to Request No. 78 on the ground that the request is overbroad and unduly burdensome. Attempting to sift through nine and one half years' worth of unrestricted documents throughout the company in search of documents that discuss plans, factors to consider, and/or reasons for generation additions or modifications is overbroad and any attempt by Tampa Electric to respond would be

unduly burdensome. Tampa Electric looks at and considers factors relating to changes to its generating system virtually on a daily and sometimes hourly basis. Any attempt to assemble all such documents from January 1, 2004 could require hundreds of hours of effort and impose an unreasonable commitment of employee time and energy.

3. Tampa Electric objects to POD No. 79 which reads as follows:

79. Regarding Ashburn at 31:-7-9. Please produce all documents dated January 1, 2004 or later that discuss the relationship of customer energy usage and or customer demand needs, in relation to planning for power plant development and/or conversion.

Basis for Objection: Tampa Electric objects Request No. 79 on the ground that the request is overbroad and unduly burdensome. Attempting to sift through nine and one half years' worth of unrestricted documents throughout the company in search of documents of the type so broadly defined in this request is overbroad and any attempt by Tampa Electric to respond would be unduly burdensome. Tampa Electric analyzes factors relating to the relationship of customer energy usage and/or customer demand needs, in relation to the company's generation needs on a daily basis and throughout each day in some form or fashion. Any effort to produce all documents relating to this subject matter from January 1, 2004 would be an overburdening, oppressive and unwarranted undertaking which could require hundreds of hours of employee time and energy. This request is overbroad, although Tampa Electric would be willing to consider responding to a narrower scope of inquiry if HUA could be significantly more specific in the documents it requires.

4. Tampa Electric objects to POD No. 133 which reads as follows:

133. Regarding Ashburn at 17:6-18. Please provide copies of all documents that discuss, analyze, or reflect Tampa Electric's efforts, or communications, made since January 1, 2007 regarding Tampa Electric's opportunities to market its transmission services to wholesale customers.

Basis for Objection: Tampa Electric objects Request No. 133 on the ground that the request is overbroad and unduly burdensome. Attempting to sift through six and one half years' worth of unrestricted documents throughout the company in search of "discuss, analyze or reflect" Tampa Electric's "efforts or communications" is overbroad and any attempt by Tampa Electric to respond would be unduly burdensome. Requiring Tampa Electric to go back from January 1, 2007 forward in search of documents that discuss, analyze or reflect on activities the company may have engaged in on a daily or hourly basis would be extremely oppressive and unduly burdensome undertaking requiring potentially hundreds of hours of searching through documents across the company. Tampa Electric would be willing to respond to a narrower scope of inquiry if HUA could be significantly more specific in describing the documents it needs.

5. Tampa Electric objects to POD No. 145 which reads as follows:

145. Regarding Chronister at 47:1-18. Please provide a copy of all documents and/or communications showing the annual transmission revenues, categorized by duration of transmission service provide (e.g., long-term, short-term, monthly weekly, daily, hourly, etc.), tat Tampa Electric annually received from wholesale customers beginning on January 1, 2000 and continuing through the present.

Basis for Objection: Tampa Electric objects to Request No. 145 on the ground that the request is overbroad and unduly burdensome. Attempting to sift through thirteen and one half years' worth of unrestricted documents throughout the company in search of documents of the type so broadly defined in this request is overbroad and any attempt by

Tampa Electric to respond would be unduly burdensome. Requiring Tampa Electric to go back from January 1, 2000 forward in search of documents that discuss, analyze or reflect on activities the company may have engaged in on a daily or hourly basis would be extremely oppressive and over burdensome undertaking requiring potentially hundreds of hours of searching through documents across the company.

WHEREFORE, Tampa Electric submits the foregoing specific objections to HUA's requests for production of documents nos. 74, 78, 79, 133 and 145.

DATED this 11th day of June 2013.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Specific Objections to HUA's Second Set of Document Requests (Nos. 11-149), filed on behalf of Tampa Electric Company, was served by email, hand delivery(*) or U. S. Mail on this 11th day of June, 2013 to the following:

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