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Sent: Monday, July 29, 2013 2:41 PM
To: Filings@psc.state.fl.us
Subject: Docket No. 130040-EI: HUA's Objections to TECO's First Sets of Interrogatories (Nos. 1-2) and Document Requests (Nos. 1-8)
Attachments: HUA's Objections to TECO's 1st Sets of ROGs and PODs.pdf

Electronic Filing

a. Person responsible for this electronic filing:

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b. Docket No. 130040-EI.

c. Document being filed on behalf of WCF Hospital Utility Alliance (WCF HUA).

d. There are a total of 15 pages.

e. The document attached for electronic filing is HUA's Objections to TECO's First Sets of Interrogatories (Nos. 1-2) and Document Requests (Nos. 1-8).

(See attached HUA's Objections to TECO's 1st Sets of ROGS and PODs.pdf)

Thank you for your attention and cooperation to this request.

Regards.
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

**In re: Petition for rate increase by Florida
Power & Light Company**

§
§
§
§
§
§

Docket No.: 130040-EI

Dated: July 29, 2012

**WCF HOSPITAL UTILITY ALLIANCE'S
OBJECTIONS TO TAMPA ELECTRIC COMPANY'S
FIRST SET OF INTERROGATORIES (NOS. 1-2) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-8)**

Pursuant to Rule 28-106.206 of the Florida Administrative Code and Rules 1.340 and 1.350 of the Florida Rules of Civil Procedure, the WCF Hospital Utility Alliance ("HUA"), by and through its undersigned representatives, hereby submits the following objections to Tampa Electric Company's ("Tampa Electric") First Set of Interrogatories (Nos. 1-2) and First Request for Production of Documents (Nos. 1-8) dated July 9, 2013.

I. Preliminary Nature of Objections

A. HUA's objections stated herein are preliminary in nature. HUA is furnishing its objections consistent with the timeframe set forth in the Florida Public Service Commission's ("Commission") Order Establishing Procedure, Order No. PSC-13-0150-PCO-EI, and Rule 1.190(e) of the Florida Rules of Civil Procedure. Should HUA discover additional grounds for objection as it develops its responses, HUA reserves the right to supplement or modify its objections. Should HUA determine that a protective order is necessary regarding any of the information requested of HUA, HUA reserves the right to file a motion with the Commission seeking such an order.

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II. General Objections

A. HUA objects to each Tampa Electric request that requires information pertaining to periods that date back to 2006 or beyond. Information from such distant chronological periods is not relevant, nor is it reasonably calculated to lead to the discovery of admissible evidence. In addition, it would be unduly burdensome to require HUA to research and produce information and documents from periods prior to January 1, 2007.

B. HUA objects to each Tampa Electric request that requires information in the possession of other entities. HUA will provide relevant materials in its possession and control and will not be responsible for obtaining materials from other entities.

C. HUA objects to each discovery request that calls for information protected by the attorney-client privilege, the work product doctrine, the common interests privilege, joint defense privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time response is first made or is later determined to be applicable for any reason. HUA in no way intends to waive such privilege or protection. HUA objects to Tampa Electric's instructions to the extent they purport to require HUA to provide more information, with respect to withheld privileged documents, than required under applicable rules and law. The nature of the withheld privileged document(s), if any, responsive to a Tampa Electric discovery request will be described in a privilege log prepared by HUA.

D. HUA objects to providing information that is proprietary, confidential business information without provisions in place to protect the confidentiality of the information. HUA in no way intends to waive claims of confidentiality.

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E. HUA objects to each discovery request that seeks information that is duplicative, or not relevant to the subject matter of this proceeding and not reasonably calculated to lead to the discovery of admissible evidence. HUA expressly reserves and does not waive any and all objections to the admissibility, authenticity or relevancy of the information provided in its responses to the discovery requests.

F. HUA objects to each and every discovery request that calls for the production of documents and/or disclosure of information from HUA that does not deal with Tampa Electric's justification for claims of changes in rates for services provided by Tampa Electric. Documents and/or information, aside from those involving justification for Tampa Electric's claim of changed rates, do not affect Tampa Electric's rates or cost of service. Further, the information thus elicited is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Moreover, such requests are by their very nature unduly burdensome and overly broad. Subject to and without waiving any other objections, HUA will respond to the extent the discovery request pertains to Tampa Electric's claimed justification for changes in rates and services.

G. Responsive documents may be located in a variety of different cities. Thus, it is possible that not every relevant document may have been consulted in developing HUA's responses. The responses given by HUA will, however, provide all the documents and/or information that HUA obtained after a reasonable and diligent search conducted in connection with a discovery request. To the extent that discovery requests propose to require more, HUA objects on the ground that compliance would impose either an undue burden or expense on HUA.

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H. HUA objects to any production location other than their attorneys' office at 1350 I Street, NW, Washington, DC 20005 or such other location of HUA's choosing.

I. HUA objects to any definition and/or instruction in any interrogatory or request to the extent they purport to impose upon HUA any obligations that HUA does not have under the law.

J. HUA objects to each request that is vague, ambiguous, or overly broad, imprecise, or utilizes terms subject to multiple interpretations, but not properly defined or explained for purposes of such discovery requests. Any responses provided by HUA to any Tampa Electric discovery request will be provided subject to, and without waiver of the foregoing objection.

K. HUA objects to each request that requires HUA to prepare information in a particular format, to create new data, documents or studies, to perform legal research, or to perform calculations or analyses not previously prepared, created or performed by HUA. HUA will provide material in existing formats, but will not be required to create new data or documents, conduct new studies, perform new calculations or analyses, or acquire new software to respond to requests.

L. HUA objects to providing information that is already in the public record or that is as easily accessible to Tampa Electric as to HUA or already is in Tampa Electric's possession or is readily accessible through legal search engines.

M. HUA objects to each discovery request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Sections 90.506 and 366.093(3)(a) of the Florida Statutes. HUA also objects to provision of any document that

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would expose them to claims of copyright or other intellectual-property based claims, or any other adverse claim or exposure based upon provisions of licensing or other agreements.

N. HUA objects to discovery requests that are intended to harass HUA and/or its members.

O. HUA reserves its right to count discovery requests and their sub-parts, as permitted under the applicable rules of procedure, in determining whether it is obligated to respond to additional requests served by any party. HUA objects to any attempt by the party seeking discovery to evade any numerical limitations set on interrogatories or requests by asking multiple independent discovery requests within a single individual discovery request and subparts thereof.

P. By making these general objections at this time, HUA does not waive or relinquish its right to assert additional general and specific objections to the subject discovery at the time HUA's response is due.

III. Specific Objections

Without prejudice to or waiver of the application of HUA's General Objections to these and/or other requests, HUA supplements such objections as follows:

A. HUA objects to POD No. 1, which reads as follows:

1. With respect to each person whom HUA expects to call as an expert witness in this proceeding, identify the witness and produce the following in hard copy and to thee [*sic*] extent it exists in the following format, in EXCEL or EXCEL compatible format with all formulae intact and unlocked:

(a) Copies of all testimonies and exhibits submitted by the witness in utility regulatory proceedings in Florida and in all other regulatory jurisdictions from January 1, 2008 to date.

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- (b) Copies of all workpapers, calculations, spreadsheets, computer models, computer programs and other materials prepared by, for or on behalf of the witness, or otherwise relied upon by the witness, that support the witness's testimony in this proceeding and all of such documents that support the conclusions or recommendations contained in such testimony.
- (c) Copies of all decisions and orders of regulatory agencies from January 1, 2005 to date referring to testimony presented or positions taken by the witness in the proceeding that gave rise to such decision or order.
- (d) Copies of all orders or decisions reflecting or supporting your answer to Interrogatory 2(b).

Basis for Objection: HUA objects to POD No. 1(a) on the grounds that this request is overbroad and unduly burdensome as propounded. Further, HUA objects to this request to the extent that the request seeks documents that are publicly available, are as easily accessible to Tampa Electric as to HUA, are already in Tampa Electric's possession, or are readily accessible through legal search engines. The testimonies and exhibits submitted by HUA's witnesses in other "utility regulatory proceedings in Florida and in all other regulatory jurisdictions from January 1, 2008 to date" are publicly available documents. Each of HUA's witnesses list their appearances in their *curriculum vitae* filed with their testimony in this proceeding. HUA also objects to this request to the extent that the requested testimonies and exhibits are confidential. HUA only will provide these testimonies and exhibits in redacted format. HUA also objects to POD No. 1(b) to the extent it requests all "materials prepared by, for or on behalf of the witness, or otherwise relied upon by the witness, that support the witness's testimony in this proceeding." In addition, each of HUA's witnesses has decades of experience regarding the subject matter covered by their testimony, and each has reviewed voluminous

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materials over the years which contribute to the bases for their testimony here. HUA objects to providing any such documents unless specifically relied upon in the course of a witness preparing his testimony here further, as propounded, this request would include all of Tampa Electric's materials provided in this proceeding. HUA objects to producing any such materials that are already in Tampa Electric's possession. HUA additionally objects to POD No. 1(c) and (d) because they call upon HUA to conduct legal research on all regulatory agency decisions where one of HUA's witnesses presented testimony to identify, and potentially speculate, whether the regulatory agency decision or order from January 1, 2005 to date adopted or took the position of HUA's witness that gave rise to its decision or order. The decisions and orders of the regulatory agencies in which HUA witnesses presented testimony are publicly available for Tampa Electric's review and HUA objects to producing these decisions and orders to Tampa Electric as requested in POD No. 1(c) and (d).

B. HUA objects to POD No. 2, which reads as follows:

2. Provide complete copies of all documents, data and other information requested formally or informally by any Party to HUA in this proceeding, including the Commission Staff, identifying material by reference to the original request from the Party or Commission Staff.

Basis for Objection: HUA objects to POD No. 2 on the grounds that such communications among counsel, inclusive of Commission Staff, in this proceeding are irrelevant to any issue presented in this case and not reasonably calculated to lead to the discovery of admissible evidence. *See* General Objection No. F and N. Further, HUA objects to this request to the extent that this request calls for HUA to provide a copy of

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any document, data or other information that is publicly available, is already in the possession of Tampa Electric, or is protected by the attorney work product doctrine, the common interests privilege, joint defense privilege or any other applicable privilege or protection afforded by law. *See* General Objection Nos. C and L.

C. HUA objects to POD No. 3, which reads as follows:

3. With respect to any testimony HUA plans to file in this proceeding addressing jurisdiction separation, class cost of service or rate design issues, provide a working copy of any jurisdictional and class cost -of-service studies utilized by the HUA witness to support that testimony in this proceeding in hard copy and in EXCEL or EXCEL compatible format with all formulae intact and unlocked.

Basis for Objection: HUA objects to POD No. 3 to the extent that the request calls for "plans to file." HUA will limit its response to what has been filed in this proceeding. Further, HUA objects to POD No. 3 to the extent that the request calls for HUA to provide the requested studies in hard copy and to convert such studies into EXCEL or EXCEL compatible format. HUA will provide the requested documents in native format and will not convert any such studies into EXCEL or EXCEL compatible format. Requiring HUA to convert any such studies into the format requested would impose an undue burden upon HUA, requiring potentially hundreds of hours and/or the purchase of software that HUA does not currently possess. *See* General Objection No. K. Further, to the extent that the requested studies are voluminous, HUA objects to providing such studies in hard copy. HUA will provide responsive documents to Tampa Electric electronically in native format, which will permit Tampa Electric to print such documents at its own choosing and expense. Where Tampa Electric already possesses the requested

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documents (*e.g.*, Tampa Electric's class cost of service study), HUA objects to providing such documents and will not provide a copy to Tampa Electric.

D. HUA objects to POD No. 4, which reads as follows:

4. With respect to any testimony HUA plans to file in this proceeding addressing jurisdiction separation, class cost of service or rate design issues, provide a copy of all documents referenced in that testimony not otherwise provided as a separate exhibit to the testimony.

Basis for Objection: HUA objects to POD No. 4 to the extent that the request calls for "plans to file." HUA will limit its response to what has been filed in this proceeding. Further, HUA objects to POD No. 4 to the extent that the request calls for HUA to provide a copy of any document that is publicly available or is already in the possession of Tampa Electric. *See* General Objection No. L.

E. HUA objects to POD No. 5, which reads as follows:

5. With respect to any testimony HUA plans to file in this proceeding addressing jurisdiction separation, class cost of service or rate design issues, provide a copy of all work papers underlying that testimony in hard copy and in EXCEL or EXCEL compatible format (if such format is relevant to such work papers), with all formulae intact and unlocked.

Basis for Objection: HUA objects to POD No. 5 to the extent that the request calls for "plans to file." HUA will limit its response to what has been filed in this proceeding. Further, HUA objects to POD No. 5 to the extent that the request calls for HUA to provide the requested studies in hard copy and to convert such studies into EXCEL or EXCEL compatible format. HUA will provide the requested documents in native format and will not convert any such studies into EXCEL or EXCEL compatible format. Requiring HUA to convert any such studies into the format requested would

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impose an undue burden upon HUA, requiring potentially hundreds of hours and/or the purchase of software that HUA does not currently possess. *See* General Objection No. K. Further, to the extent that the requested studies are voluminous, HUA objects to providing such studies in hard copy. HUA will provide responsive documents to Tampa Electric electronically in native format, which will permit Tampa Electric to print such documents at its own choosing and expense. Where Tampa Electric already possesses the requested documents (*e.g.*, Tampa Electric's class cost of service study), HUA objects to providing such documents and will not provide a copy to Tampa Electric.

F. HUA objects to POD No. 6, which reads as follows:

6. With respect to any testimony HUA plans to file in this proceeding addressing jurisdiction separation or class cost of service issues, provide a copy of all documents reviewed by the witness in reaching any conclusions that witness proposes regarding the Commission adopting a particular cost of service methodology or rejecting the Company's proposed cost of service methodology in this proceeding.

Basis for Objection: HUA objects to POD No. 6 to the extent that the request calls for "plans to file." HUA will limit its response to what has been filed in this proceeding. Further, HUA objects to POD No. 6 to the extent that the request calls for HUA to provide "all documents reviewed by the witness in reaching any conclusion" in this proceeding. This request is overbroad as HUA's witnesses have many years of experience in utility analysis, including in analyzing jurisdiction separation or class cost of service issues, and it would be impossible to identify all documents that HUA's witnesses may have reviewed over the course of their long careers in connection to the

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testimony offered. Any attempt by HUA to respond to this request would be unduly burdensome.

G. HUA objects to POD No. 7, which reads as follows:

7. With respect to any testimony HUA plans to file in this proceeding addressing rate design issues, provide a copy of all documents reviewed by the witness in reaching any conclusions that witness proposes regarding the Commission adopting a particular rate design or rejecting the Company's proposed rate design in this proceeding.

Basis for Objection: HUA objects to POD No. 7 to the extent that the request calls for HUA to provide "all documents reviewed by the witness in reaching any conclusion" in this proceeding. This request is overbroad as HUA's witnesses have many years of experience in utility analysis, including in analyzing rate design issues, and it would be impossible to identify all documents that HUA's witnesses may have reviewed over the course of their long careers in connection to the testimony offered. Any attempt by HUA to respond to this request would be unduly burdensome.

H. HUA objects to POD No. 8, which reads as follows:

8. With respect to any testimony HUA plans to file in this proceeding addressing jurisdiction separation, class cost of service or rate design issues, provide a copy of any testimony given by the HUA witness in prior cases (before the Florida Public Service Commission, or any other United States state regulatory commission, as part of a proceeding dealing with electric utility matters) on behalf of any party, that addresses the issues of:
 - a) Appropriate energy allocation of cost in class cost of service studies;
 - b) Appropriate determination of classes in class cost of service studies;
 - c) Appropriate allocation of cost to classes for large customers (e.g. industrial customer classes, classes for large demand customers);
 - d) Appropriate allocation of cost to interruptible classes in class cost of service studies;

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- e) Rate design for classes for large customers (e.g. industrial rates, large demand rates);
- f) Rate design for interruptible customers; and
- g) "Gradualism" as a word or concept when applied to electric rate design, however the witness defines it.

Basis for Objection: HUA objects to POD No. 8 on the grounds that the request is overbroad and unduly burdensome. HUA's witnesses have many years of experience in utility analysis and have testified in numerous electric utility matters before state regulatory commissions, including the Florida Public Service Commissions, over their long careers. Requiring HUA to review each piece of testimony that spans several decades to identify which testimonies include responsive information would require potentially hundreds of hours to complete. HUA further objects to this request to the extent that the requested testimonies and exhibits are confidential.

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Respectfully submitted,

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Qualified Representatives for the
WCF Hospital Utility Alliance

DATED: July 29, 2013

CERTIFICATE OF SERVICE
DOCKET NO. 130040-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by electronic mail, U.S. Mail, or Federal Express, this 29th day of July, 2013, to the following:

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