

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

Docket No. 130040-EI

Filed: August 13, 2013

**OFFICE OF PUBLIC COUNSEL'S OBJECTIONS TO STAFF'S FIRST SET OF
REQUESTS FOR PRODUCTION OF DOCUMENTS**

(NOS. 1-3)

Office of Public Counsel, ("Citizens"), by the requirements set forth in the Commission Order No. PSC-13-0150-PCO-EI, Rule 28-106-206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, submit the following response to the First Set of Requests for Documents (Nos. 1-3) propounded by the Staff of the Florida Public Service Commission (Staff) on July 24, 2013.

GENERAL OBJECTIONS

With respect to the "Definitions" and "Instructions" in the requests, Citizens object to any definitions or instructions that are inconsistent with Citizens' discovery obligations under applicable rules. If some question arises as to Citizens' discovery obligations, Citizens will comply with applicable rules and not with any of the definitions or instructions that are inconsistent with those rules.

Citizens object to each and every request to the extent it is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such discovery requests. Any responses provided by Citizens are provided subject to, and without waiver of, the foregoing objection.

Citizens object to the extent any discovery request is unduly burdensome. Citizens further object to any requests that would require Citizens and/or its consultants to perform a new study or analysis.

Citizens generally object to any request that calls for data or information protected by the attorney-client privilege, the work product privilege, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law.

Citizens reserve the right to supplement any of its responses if Citizens cannot locate the answers immediately due to their magnitude and the work required to aggregate them, or if Citizens later discover additional responsive information in the course of this proceeding. By making these general objections at this time, Citizens do not waive or relinquish its right to assert additional general and specific objections to Tampa Electric's discovery.

By making these responses herein, Citizens do not concede that any request is relevant to this action or is reasonably calculated to lead to the discovery of admissible evidence. Citizens expressly reserve the right to object to further discovery into the subject matter of any of these requests, to the introduction of evidence of any response or portion thereof, and to supplement its responses should further investigation disclose responsive information.

Citizens object to providing information to the extent that such information is already in the public record through the Florida Public Service Commission or other governmental body and available to Tampa Electric through normal procedures.

In responding to these Requests, Citizens do not waive the foregoing objections, or the specific objections that are set forth in the responses to particular requests.

ADDITIONAL SPECIFIC OBJECTIONS

In addition to the general objections which apply to every interrogatory, Citizens provide the following objections to specific requests for production of documents:

DOCUMENTS REQUESTED

1. Please provide copies of all source materials, publications, documents, and surveys, cited in the footnotes of the direct testimony of witness J. Randall Woolridge that are not included in the Exhibits attached to his direct testimony.

RESPONSE: Citizens have no specific objection at this time. However, Citizens reserve the right to assert any additional objections based on confidentiality and/or privilege that come to Citizens' attention during the preparation of the discovery.

2. Please provide any documents responsive to any risk comparison analyses related to Interrogatory 1a and 1b.

RESPONSE: RESPONSE: Citizens have no specific objection at this time. However, Citizens reserve the right to assert any additional objections based on confidentiality and/or privilege that come to Citizens' attention during the preparation of the discovery.

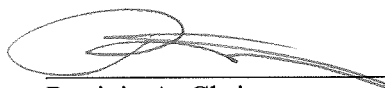
3. Please provide any documents responsive to any analyses related to Interrogatory 6a and 6b.

RESPONSE: Citizens object to the extent this question appears to misidentify the correct interrogatory, in that Staff's Interrogatory No. 6 does not have subparts. Citizens reserve the right to assert any additional objections based on confidentiality and/or privilege that

come to Citizens' attention during the preparation of the discovery.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Citizens Objections to Staff's First Request for Production of Documents (Nos. 1-3) was furnished by e-mail this 13th day of August, 2013 to:

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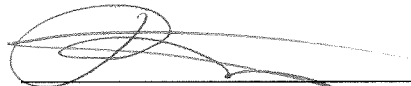
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