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September 1, 2015

VIA: ELECTRONIC FILING

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850


Re: Fuel and Purchased Power Cost Recovery Clause with Generating
Performance Incentive Factor; FPSC Docket No. 150001-EI

Dear Ms. Stauffer:

Attached for filing in the above docket is Tampa Electric Company's Objections to Citizens' Fourth Set of Interrogatories (Nos. 50-57), propounded and served by electronic mail on August 27, 2015.

Thank you for your assistance in connection with this matter.

Sincerely,


James D. Beasley

JDB/pp
Attachment

cc: All parties of record (w/attachment)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased)
Power Cost Recovery Clause)
and Generating Performance)
Incentive Factor.)
_____)

DOCKET NO. 150001-EI

FILED: September 1, 2015

**TAMPA ELECTRIC COMPANY'S OBJECTIONS
TO CITIZENS' FOURTH SET OF INTERROGATORIES
TO TAMPA ELECTRIC COMPANY (NOS. 50-57)**

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.340, Florida Rules of Civil Procedure, and the Order Establishing Procedure in this matter, Tampa Electric Company ("Tampa Electric or "the company") hereby serves its objections to Florida Citizens' ("OPC") Fourth Interrogatories to Tampa Electric (Nos. 50-57, and respectively, and together "the Requests") and states as follows:

GENERAL OBJECTIONS

With respect to any "Definitions" and Instructions" in OPC's Interrogatories, Tampa Electric objects to any definitions or instructions that are inconsistent with Tampa Electric's discovery obligations under applicable rules. If some question arises as to Tampa Electric's discovery obligations, Tampa Electric will comply with applicable rules and not with any of OPC's definitions that are inconsistent with those rules. Tampa Electric also objects to any request that calls for information that is not within the scope of discovery under the applicable rules and law. Furthermore, Tampa Electric objects to any definition or request that seeks to encompass persons or entities other than Tampa Electric who are not parties to this action and thus are not subject to discovery. Tampa Electric objects to any request that calls for Tampa Electric to perform analyses that it has not otherwise performed and would not normally perform

in the ordinary course of its business because there is no such requirement under the applicable rules and law.

Additionally, Tampa Electric generally objects to OPC's requests to the extent that they call for information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law. Tampa Electric will provide a privilege log in accordance with the applicable law or as may be agreed to by the parties to the extent, if at all, that any request calls for the production of privileged or protected information.

Further, in certain circumstances, Tampa Electric may determine upon investigation and analysis that information responsive to certain requests to which objections are not otherwise asserted is confidential and proprietary and should be produced only under an appropriate confidentiality agreement and protective order, if at all. By agreeing to provide such information in response to such a request, Tampa Electric is not waiving its right to insist upon appropriate protection of confidentiality by means of a confidentiality agreement, protective order, or the procedures otherwise provided by law on in the Order Establishing Procedure. Tampa Electric hereby asserts its right to require such protection of any and all information that may qualify for protection under the Florida Rules of Civil Procedure, the Order Establishing Procedure, and all other applicable statutes, rules and legal principles.

Tampa Electric generally objects to OPC's interrogatories to the extent that they call for the production of documents on the ground that such a request is beyond the scope or Rule 1.340 of the Florida Rules of Civil Procedure.

By making these general objections at this time, Tampa Electric does not waive or relinquish its right to assert additional general and specific objections to OPC's discovery at the

time Tampa Electric's response is due under the Florida Rules of Civil Procedure and the Order Establishing Procedure. Tampa Electric provides these general objections at this time to comply with the intent of the Order Establishing Procedure to reduce the delay in identifying and resolving any potential discovery disputes.

SPECIFIC OBJECTIONS

Interrogatory 50: Tampa Electric objects to this interrogatory on the basis that it is overly burdensome in that it requests Tampa Electric to perform analyses that it has not otherwise performed and would not normally perform in the ordinary course of its business. Tampa Electric does not know how it would go about attempting to make such a calculation.

Interrogatory 51: Tampa Electric objects to this interrogatory on the basis that it is overly burdensome in that it requests Tampa Electric to perform analyses that it has not otherwise performed and would not normally perform in the ordinary course of its business. Tampa Electric does not know how it would go about attempting to make such a calculation.

Interrogatory 57: Tampa Electric objects to this interrogatory on the basis that it is overly burdensome to the extent that it requests Tampa Electric to perform analyses that it has not otherwise performed and would not normally perform in the ordinary course of its business. Certain of the requested information may not be available and cannot be provided. To the extent that the information requested in the subparts of this request is available, Tampa Electric will provide it.

DATED this 1st day of September 2015.

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 Objections has been furnished by electronic mail on this on this 1st day of September 2015 to the following:

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