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# AUSLEY MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

123 SOUTH CALHOUN STREET P.O. BOX 391 (ZIP 32302) TALLAHASSEE, FLORIDA 32301 (850) 224-9115 FAX (850) 222-7560

# April 9, 2018

#### HAND DELIVERED

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

Re: Petition for recovery of costs associated with named tropical systems during the 2015, 2016 and 2017 hurricane seasons and replenishment of storm reserve subject to final true-up, by Tampa Electric Company FPSC Docket No. 20170271-EI

Dear Ms. Stauffer:

Enclosed for filing in the above docket are the original and one copy of Tampa Electric Company's Answers to Office of Public Counsel's Request for Production of Documents Nos. 1-10, propounded and served by electronic mail on March 23, 2018.

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,

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James D. Beasley

JDB/pp Enclosure

cc: All parties of record (w/enc.)

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#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for recovery of cost associated ) with named tropical systems during the ) 2015, 2016 and 2017 hurricane seasons and ) replenishment of storm reserve subject to ) final true-up, by Tampa Electric Company. ) DOCKET NO. 20170271-EI

FILED: April 9, 2018

## TAMPA ELECTRIC COMPANY'S ANSWERS TO OFFICE OF PUBLIC COUNSEL'S REQUEST FOR PRODUCTION OF DOCUMENTS NOS. 1-10

Tampa Electric Company ("Tampa Electric" or "the company") answers Office of Public Counsel's ("OPC's") Request for Production of Documents Nos. 1-10, served on Tampa Electric on March 23, 2018, by saying the company will provide the requested documents for inspection by OPC at a date, time, and location and in a manner mutually agreeable to OPC and Tampa Electric, recognizing that certain of the requested documents that Tampa Electric considers to be proprietary confidential business information and which are entitled to protection from public disclosure pursuant to Section 366.093, Florida Statutes, will be provided subject to a Motion for a Temporary Protective Order that is being filed this date with the Florida Public Service Commission ("Commission"), pursuant to Rule 25-22.006(6)(c), Florida Administrative Code.

Tampa Electric will also make the requested documents available for inspection upon request of the Commission's Staff and any other party to this proceeding at a date, time and location and in a manner mutually agreed upon, subject to the execution of an appropriate nondisclosure agreement by any non-Staff party with respect to those confidential documents identified in the above-referenced Motion for a Temporary Protective Order. DATED this 9<sup>th</sup> day of April 2018.

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Respectfully submitted,

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JAMES D. BEASLEY J. JEFFRY WAHLEN Ausley McMullen Post Office Box 391 Tallahassee, Florida 32302 (850) 224-9115

# ATTORNEYS FOR TAMPA ELECTRIC COMPANY

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Answers, filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 9<sup>th</sup> day of April

2018 to the following:

Ms. Suzanne S. Brownless Ms. Danijela Janjic Senior Attorney Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 <u>sbrownle@psc.state.fl.us</u> jdanijela@psc.state.fl.us

Office of Public Counsel J. R. Kelly Public Counsel Patricia A. Christensen Associate Public Counsel Virginia Ponder Associate Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 Kelly.jr@leg.state.fl.us Christensen.patty@leg.state.fl.us Ponder.virginia@leg.state.fl.us The Florida Industrial Power Users Group Jon C. Moyle, Jr. Karen A. Putnal Moyle Law Firm The Perkins House 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com kputnal@moylelaw.com

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ATTORNEY