

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Adoption of Numeric Conservation
Goals for Tampa Electric Company

DOCKET NO.: 971005-EG

**LEAF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS
TO TAMPA ELECTRIC COMPANY**

Intervenor, Legal Environmental Assistance Foundation, Inc., ("LEAF"), pursuant to Rule 28-106.206, Florida Administrative Code (FAC), and Florida Rules of Civil Procedure 1.350 and 1.280, hereby serves the following Request for Production of Documents on Tampa Electric Company ("TECO"):

Please produce for purposes of inspection and copying, the following documents at LEAF, 1114 Thomasville Road, Suite E, Tallahassee, Florida 32303, not later than 30 days after service of this request:

1. All documents identified in the Company's response to Interrogatory number 9b of LEAF's Second Set of Interrogatories to Tampa Electric Company.
2. All documents identified in the Company's response to Interrogatory number 9c of LEAF's Second Set of Interrogatories to Tampa Electric Company.
3. All documents identified in the Company's response to Interrogatory number 9d of LEAF's Second Set of Interrogatories to Tampa Electric Company.
4. All documents identified in the Company's response to Interrogatory number 11 of LEAF's Second Set of Interrogatories to Tampa Electric Company.
5. All documents identified in the Company's response to Interrogatory number 15 of LEAF's Second Set of Interrogatories to Tampa Electric Company.
6. All documents identified in the Company's response to Interrogatory number 16 of LEAF's Second Set of Interrogatories to Tampa Electric Company.
7. All documents identified in the Company's response to Interrogatory number 17 of LEAF's Second Set of Interrogatories to Tampa Electric Company.
8. All documents identified in the Company's response to Interrogatory number 21 of LEAF's Second Set of Interrogatories to Tampa Electric Company.
9. All documents identified in the Company's response to Interrogatory number 23 of LEAF's Second Set of Interrogatories to Tampa Electric Company.
10. All documents identified in response to the Company's Interrogatory number 26 of LEAF's

DOCUMENT NUMBER-DATE

01740 FEB 10 8

FPSC-RECORDS/REPORTING

Second Set of Interrogatories to Tampa Electric Company.

11. All documents identified in response to the Company's Interrogatory number 29 of LEAF's Second Set of Interrogatories to Tampa Electric Company.

12. All documents identified in response to the Company's Interrogatory number 33 of LEAF's Second Set of Interrogatories to Tampa Electric Company.

13. All documents identified in response to the Company's Interrogatory number 36 of LEAF's Second Set of Interrogatories to Tampa Electric Company.

14. All documents identified in response to the Company's Interrogatory number 37 of LEAF's Second Set of Interrogatories to Tampa Electric Company.

15. All documents identified in response to the Company's Interrogatory number 38 of LEAF's Second Set of Interrogatories to Tampa Electric Company.

16. All documents identified in response to the Company's Interrogatory number 39 of LEAF's Second Set of Interrogatories to Tampa Electric Company.

17. All documents identified in response to the Company's Interrogatory number 42 of LEAF's Second Set of Interrogatories to Tampa Electric Company.

18. All documents identified in response to the Company's Interrogatory number 43b of LEAF's Second Set of Interrogatories to Tampa Electric Company.

19. All documents identified in response to the Company's Interrogatory number 45 of LEAF's Second Set of Interrogatories to Tampa Electric Company.

20. All documents identified in response to the Company's Interrogatory number 47 of LEAF's Second Set of Interrogatories to Tampa Electric Company.

21. All documents identified in response to the Company's Interrogatory number 49 of LEAF's Second Set of Interrogatories to Tampa Electric Company.

22. All documents identified in response to the Company's Interrogatory number 50 of LEAF's Second Set of Interrogatories to Tampa Electric Company.

23. All documents identified in response to the Company's Interrogatory number 55 of LEAF's Second Set of Interrogatories to Tampa Electric Company.

24. All documents identified in response to the Company's Interrogatory number 58 of LEAF's Second Set of Interrogatories to Tampa Electric Company.

25. All documents identified in response to the Company's Interrogatory number 60 of LEAF's Second Set of Interrogatories to Tampa Electric Company.

26. All documents identified in response to the Company's Interrogatory number 61d of LEAF's Second Set of Interrogatories to Tampa Electric Company.
27. All documents identified in response to the Company's Interrogatory number 64 of LEAF's Second Set of Interrogatories to Tampa Electric Company.
28. All documents identified in response to the Company's Interrogatory number 67 of LEAF's Second Set of Interrogatories to Tampa Electric Company.
29. All documents identified in response to the Company's Interrogatory number 68c of LEAF's Second Set of Interrogatories to Tampa Electric Company.
30. All documents identified in response to the Company's Interrogatory number 70 of LEAF's Second Set of Interrogatories to Tampa Electric Company.
31. All documents identified in response to the Company's Interrogatory number 73 of LEAF's Second Set of Interrogatories to Tampa Electric Company.
32. All documents identified in response to the Company's Interrogatory number 74 of LEAF's Second Set of Interrogatories to Tampa Electric Company.
33. All documents identified in response to the Company's Interrogatory number 75 of LEAF's Second Set of Interrogatories to Tampa Electric Company.
34. All documents identified in response to the Company's Interrogatory number 76 of LEAF's Second Set of Interrogatories to Tampa Electric Company.
35. All documents identified in response to the Company's Interrogatory number 79 of LEAF's Second Set of Interrogatories to Tampa Electric Company.
36. Any computer manual identified in response to Interrogatory number 9e of LEAF's Second Set of Interrogatories to Tampa Electric Company.
37. Tampa Electric Company's Avoided Cost Study, and all analyses and workpapers underlying this study.
38. An electronic version of Tampa Electric Company's avoided cost calculations.
39. Tampa Electric Company's FERC Form 1 for 1995, 1996 and 1997.
40. The pages of Tampa Electric Company's FERC Form 1 that pertain to (a) nuclear and steam plant production (pages 202-205), (b) annual transmission and distribution investment (pages 206-207), (c) O&M expenses (pages 320-323), overhead expenses (pages 354-355), (d) energy account and monthly peaks and output (p. 401), and (e) generating plant statistics (pages 402-411) for the years 1988-1994.
41. Tampa Electric Company's most recent Ten Year Site Plan and all related supplemental

filings with the Florida Public Service Commission.

42. Tampa Electric Company's most recent FEECA report (i.e., the report submitted to the Florida Public Service Commission pursuant to Rule 5-17.0021(5), FAC).

By: Debra Swim
Debra Swim, Esquire
Legal Environmental
Assistance Foundation, Inc.
1114 Thomasville Road, Suite E
Tallahassee, Florida 32303
(904) 681-2591

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of LEAF's First Request for Production of Documents to Tampa Electric Company was hand delivered (when indicated by *) or mailed this 8th day of February, 1999 to:

Leslie Paugh, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0950

Jack Shreve, Esq.
Office of Public Counsel
111 W. Madison
Tallahassee, FL 32399-1400

Vicki Kaufman, Esq.
117 S. Gadsden St.
Tallahassee, FL 32301

Charles A. Guyton, Esq.
Steel, Hector & Davis
215 S. Monroe St., Suite 601
Tallahassee, FL 32301-1804

John McWhirter, Esq.
P.O. Box 3350
Tampa, FL 33601

Jeffrey A. Stone, Esq.
Beggs & Lane
P.O. Box 12950
Pensacola, FL 32576-2950

Lee L. Willis, Esq.*
James D. Beasley, Esq.*
Ausley & McMullen
227 South Calhoun St.

James A. McGee, Esq.
Florida Power Corporation
P.O. Box 14042
St. Petersburg, FL 33733

Mollie Lampi, Esq.
Pace University Energy Project
122 S. Swan Street
Albany, NY 12110

Debra Swim
Debra Swim, Esq.