AUSLEY & MCMULLEN

ORIGINAL

ATTORNEYS AND COUNSELORS AT LAW

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

September 7, 1999

HAND DELIVERED

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Generic Investigation into Aggregate Electric Utility Reserve margins Planned for

Peninsular Florida; FPSC Docket No. 981890-EI

Dear Ms. Bayo:

Enclosed for filing in this docket are the original and fifteen (15) copies of Tampa Electric Company's Objection to LEAF's Interrogatory No. 10.

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,

(

s D. Beasley

AFA
APP
CAF
JDB/pp
CMU Enclosures
CIR

All Parties of Record (w/enc.)

EAGO AND LEG AND MAS 5 OPC PAI SEC WAW OTH

EDOC BUDGALLOS DE

DOCUMENT NUMBER - DATE

10709 SEP-78

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic investigation into the)	
aggregate electric utility reserve)	DOCKET NO. 981890-EU
margins planned for Peninsular)	FILED: September 7, 1999
Florida)	
)	

TAMPA ELECTRIC COMPANY'S OBJECTION TO LEAF'S INTERROGATORY NO. 10

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Order No. PSC-99-0760-PCO-EU, objects to LEAF's Interrogatory No. 10 contained in LEAF's First Interrogatories to Tampa Electric Company (Nos. 1-14) and, as grounds therefor, says:

The information sought in LEAF's Interrogatory No. 10 is not relevant and does not appear likely to lead to the discovery of admissible evidence. Interrogatory No. 10 asks for information pertaining to an issue that was initially identified but later deleted from the list of issues attached to the Order Clarifying Scope of Proceeding, Order No. PSC-99-1274-PCO-EU. The omitted issue had to do with whether the Commission should consider establishing pricing thresholds relating to utility cost recovery of power purchases and sales. As such, the information sought in LEAF's Interrogatory No. 10 has no relevance to the remaining issues identified in such order.

WHEREFORE, Tampa Electric Company submits the foregoing objection to LEAF's Interrogatory No. 10.

DOCUMENT NUMPER-DATE

DATED this 2 day of September 1999.

Respectfully submitted,

LEE L. WILLIS

AMES D. BEASLEY

Ausley & McMullen

Post Office Box 391

Tallahassee, FL 32302

(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

Mr. Robert V. Elias*
Ms. Leslie Paugh*
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Mr. Paul Sexton Mr. Thorton J. Williams Thorton Williams & Associates P. O. Box 10109 Tallahassee, FL 32302

Mr. Robert Scheffel Wright Mr. John T. LaVia III Landers and Parsons, P.A. P. O. Box 271 Tallahassee, FL 32302

Mr. Jeffrey A. Stone Beggs & Lane P. O. Box 12950 Pensacola, FL 32756-2950

Ms. Michelle Hershel Florida Electric Cooperative Association P. O. Box 590 Tallahassee, FL 32302

Mr. Richard A. Zambo 598 S.W. Hidden River Avenue Palm City, FL 34990

Mr. Jon C. Moyle, Jr.
Moyle, Flanigan, Katz, Kolins,
Raymond & Sheehan, P.A.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301

Ms. Gail Kamaras Ms. Debra Swim Legal Environmental Association Foundation, Inc. 1114 Thomasville Road – Suite E Tallahassee, FL 32303-6290

Mr. John Roger Howe Office of Public Counsel 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400

Mr. Matthew M. Childs Steel Hector & Davis 215 South Monroe Street, Suite 601 Tallahassee, FL 32301-1804

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

Mr. Joseph A. McGlothlin Ms. Vicki Gordon Kaufman McWhirter, Reeves, McGlothlin, Davidson, Decker, Kaufman, Arnold & Steen, P.A. 117 S. Gadsden Street Tallahassee, FL 32301

Mr. John W. McWhirter, Jr.
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
Post Office Box 3350
Tampa, FL 33601-3350

Mr. Timothy Woodbury Seminole Electric Cooperative Post Office Box 272000 Tampa, FL 33688 Mr. Frederick M. Bryant General Counsel Florida Municipal Power Agency 2010 Delta Boulevard Tallahassee, FL 32315

Mr. Robert C. Williams Director of Engineering Florida Municipal Power Agency 7201 Lake Ellenor Drive – Suite 100 Orlando, FL 32809-5769

Mr. Ken Wiley Florida Reliability Coordinating Council 405 Reo Street, Suite 100 Tampa, FL 33609

Mr. James Swartz City of Homestead 675 N. Flagler Street Homestead, FL 33030

Mr. Gary Lawrence City of Lakeland 501 East Lemon Street Lakeland, FL 33801

Mr. J. Paul Wetzel City of St. Cloud 1300 Ninth Street St. Cloud, FL 34769

Mr. Rex Taylor City of Vero Beach P. O. Box 1389 Vero Beach, FL 32961

Mr. Thomas W. Richards Fort Pierce Utilities P. O. Box 3191 Ft. Pierce, FL 34948

Mr. Raymond O. Manasco, Jr. Gainesville Regional Utilities P. O. Box 147117
Station A-138
Gainesville, FL 32614

Mr. Ben Sharma Kissimmee Utility Authority Post Office Box 423219 Kissimmee, FL 34742

Mr. Harvey Wildschuetz City of Lake Worth Utilities 1900 Second Avenue, North Lake Worth, FL 33461

Mr. Dean Shaw City of Coal Post Office Box 1270 Ocala, FL 34478

Mr. Richard G. Feldman City of Tallahassee 300 South Adams Street Tallahassee, FL 32301

Mr. Charles A. Russell Florida Keys Electric Cooperative Post Office Box 377 Tavernier, FL 33070

Ms. Tracy E. Danese Jacksonville Electric Authority 21 West Church Street T-16 Jacksonville, FL 32202

Mr. T. B. Tart Orlando Utilities Commission Post Office Box 3193 Orlando, FL 32802

Mr. Larry J. Thompson Utility Board of the City of Key West Post Office Drawer 6100 Key West, FL 33041

Mr. Gary Sasso Carlton, Fields, Ward, Emmanuel, Smith & Cutler Post Office Box 2861 St. Petersburg, FL 33731

TORNEY