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RECORDS AND REPORTING

February 28, 2000

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: Complaint of Allied Universal Corporation and Chemical Formulators, Inc. against Tampa Electric Company for Violation of Sections 366.03, 366.06(2) and 366.07, F.S., with respect to Rates Offered Under Commercial/Industrial Service Rider Tariff and Petition to Examine and Inspect Confidential Information and Request for Expedited Relief; FPSC Docket No. 000061-EI

Dear Ms. Bayo

Enclosed for filing in the above docket are the original and fifteen (15) copies of each of the following:

1. Tampa Electric Company's Response, Motion for Protective Order, and Objections to Staff's First Request for Production of Documents (Nos. 1-8). 02649-00
2. Tampa Electric Company's Response, Motion for Protective Order, and Objections to Staff's First Set of Interrogatories (Nos. 1-7). 02650-00

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.

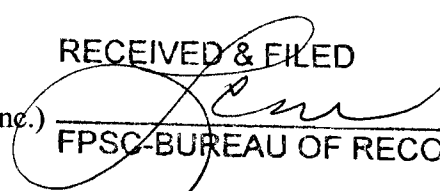
Sincerely,


James D. Beasley

AFA _____
 APP _____
 CAF _____
 CMU _____
 CTR _____
 EAG 2 *Draper*
 LEG 2
 MAS 3
 OPC _____
 PRR _____ JDB/pp
 SEC 1 Enclosures
 WAW _____
 OTH _____

cc: All Parties of Record (w/enc.)

RECEIVED & FILED


FPSC-BUREAU OF RECORDS

DOCUMENT NO.	DATE
02649-00	2/28/00
FPSC - COMMISSION CLERK	

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Allied Universal Corporation and)	DOCKET NO. 000061-EI
Chemical Formulators, Inc. against Tampa Electric)	FILED: February 28, 2000
Company)	
_____)	

**TAMPA ELECTRIC COMPANY’S RESPONSE, MOTION
FOR PROTECTIVE ORDER, AND OBJECTIONS TO STAFF’S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-8)**

Pursuant to Rule 28-106.206, Florida Administrative Code and discovery provisions of the Florida Rules of Civil Procedure, Tampa Electric Company (“Tampa Electric” or “the company”) submits the following Response, Motion for Protective Order and Objections to Staff’s First Request for Production of Documents (Nos. 1-8), and says:

1. Tampa Electric objects to Staff’s First Request for Production of Documents (Nos. 1-8) only to the extent that such requests call for any public disclosure of any of the information relating to Tampa Electric Company’s negotiations with Odyssey Manufacturing Company (“Odyssey”), Allied Universal Corporation and Chemical Formulators, Inc. (“Allied/CFI”) relative to a Commercial/Industrial Service Rider (“CISR”) Contract Service Agreement (“CSA”). Tampa Electric plans to submit to the Commission on a confidential basis documentation similar to that requested in Staff’s First Request for Production of Documents. That documentation and accompanying confidential affidavits or testimony will fully describe the negotiations Tampa Electric engaged in with Odyssey on the one hand and Allied/CFI on the other. The sole purpose of this Response, Motion for Protective Order and Objections is to underscore the need for confidential treatment of the information requested by Staff.

Motion for Protective Order

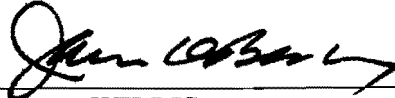
2. Tampa Electric's objections to Staff's discovery requests are submitted pursuant to the authority contained in Slatnick v. Leadership Housing Systems of Florida, Inc., 368 So. 2d 78 (Fla. 3rd DCA 1979). To the extent that a motion for protective order is required, Tampa Electric's objections are to be construed as a request for protective order.

DATED this 28th day of February 2000.

Respectfully submitted,

HARRY W. LONG, JR.
Chief Counsel
TECO Energy, Inc.
Post Office Box 111
Tampa, FL 33601
(813) 228-4111

and



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Response, Motion for Protective Order and Response, filed on behalf of Tampa Electric Company, has been furnished by hand delivery(*) or U. S. Mail this 28th day of February, 2000 to the following:

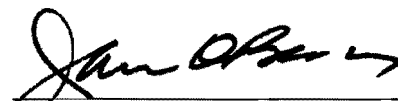
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Miami, FL 32166-2026

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Tampa, FL 33611-3223

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ATTORNEY

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