

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In 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, Florida Statutes,)
with respect to rates offered under)
Commercial/Industrial Service Rider tariff;)
petition to examine and inspect confidential)
information; and request for expedited)
relief.)
_____)

Docket No. 000061-EI

Filed: September 25, 2000

**ALLIED/CFI'S OBJECTIONS IN RESPONSE TO TAMPA ELECTRIC
COMPANY'S FIRST SET OF INTERROGATORIES (NOS. 1-24)**

Allied Universal Corporation ("Allied") and its affiliate, Chemical Formulators, Inc. ("CFI"), hereinafter referred to collectively as "Allied/CFI," by and through their undersigned counsel, and pursuant to Rule 1.340, Florida Rules of Civil Procedure, Rule 28-106.206, Florida Administrative Code, and Order No. PSC-00-0392-PCO-EI issued on February 23, 2000 in this proceeding, hereby serve the following objections to the First Set of Interrogatories (Nos. 1-24) served by Tampa Electric Company ("TECO").

General Objections

1. Allied/CFI objects to each interrogatory insofar as it seeks to impose obligations on Allied/CFI which exceed the requirements of the Florida Rules of Civil Procedure or Florida law.
2. Allied/CFI objects to each interrogatory insofar as it calls for information which is protected against discovery by the attorney/client privilege, the attorney work product privilege, or other applicable privilege.

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Objections to Interrogatories

1. Allied/CFI objects to subsections (b) through (e) of Interrogatory No. 2 on the grounds that these subsections call for trade secret information, and that the information requested is not relevant to the subject matter of this proceeding and not calculated to or likely to lead to the discovery of evidence which would be admissible in this proceeding. See, Southern Bell T.&T. v. Mobile American Corporation, Inc., 291 So.2d 199 (Fla. 1974).

2. Allied/CFI objects to Interrogatory No. 3 on the grounds that it calls for trade secret information, and that the information requested is not relevant to the subject matter of this proceeding and not calculated to or likely to lead to the discovery of evidence which would be admissible in this proceeding. See, Southern Bell T.&T. v. Mobile American Corporation, Inc., 291 So.2d 199 (Fla. 1974).

3. Allied/CFI objects to Interrogatory No. 5 on the grounds that it calls for trade secret information, and that the information requested is not relevant to the subject matter of this proceeding and not calculated to or likely to lead to the discovery of evidence which would be admissible in this proceeding. See, Southern Bell T.&T. v. Mobile American Corporation, Inc., 291 So.2d 199 (Fla. 1974).

4. Allied/CFI objects to Interrogatory No. 6 on the grounds that it calls for trade secret information, and that the information requested is not relevant to the subject matter of this proceeding and not calculated to or likely to lead to the discovery of evidence which would be admissible in this proceeding. See, Southern Bell T.&T. v. Mobile American Corporation, Inc., 291 So.2d 199 (Fla. 1974).

5. Allied/CFI objects to Interrogatory No. 7 on the grounds that it calls for trade secret information, and that the information requested is not relevant to the subject matter of this proceeding and not calculated to or likely to lead to the discovery of evidence which would be admissible in this proceeding. See, Southern Bell T.&T. v. Mobile American Corporation, Inc., 291 So.2d 199 (Fla. 1974).

6. Allied/CFI objects to Interrogatory No. 8 on the grounds that it calls for trade secret information, and that the information requested is not relevant to the subject matter of this proceeding and not calculated to or likely to lead to the discovery of evidence which would be admissible in this proceeding. See, Southern Bell T.&T. v. Mobile American Corporation, Inc., 291 So.2d 199 (Fla. 1974).

7. Allied/CFI objects to Interrogatory No. 9 on the grounds that it calls for trade secret information, and that the information requested is not relevant to the subject matter of this proceeding and not calculated to or likely to lead to the discovery of evidence which would be admissible in this proceeding. See, Southern Bell T.&T. v. Mobile American Corporation, Inc., 291 So.2d 199 (Fla. 1974).

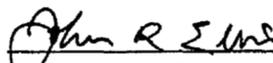
8. Allied/CFI objects to subsection (b) of Interrogatory No. 11 on the grounds that it calls for trade secret information which Allied/CFI already has provided to TECO but has not provided and objects to providing to Odyssey Manufacturing Company and its affiliates (“Odyssey”). Without waiver of this objection, Allied/CFI will provide a response to subsection (b) of Interrogatory No. 11.

9. Allied/CFI objects to Interrogatory No. 13 on the grounds that it calls for trade secret information.

10. Allied/CFI objects to Interrogatory No. 20 on the grounds that it calls for trade secret information which Allied/CFI already has provided to TECO but has not provided and objects to providing to Odyssey. Without waiver of this objection, Allied/CFI will provide a response to Interrogatory No. 20.

11. Allied/CFI objects to Interrogatory No. 21 on the grounds that it calls for trade secret information which Allied/CFI already has provided to TECO but has not provided and objects to providing to Odyssey. Without waiver of this objection, Allied/CFI will provide a response to Interrogatory No. 21.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Allied/CFI's Objections in Response to Tampa Electric Company's First Set of Interrogatories (Nos. 1-24) was furnished by U. S. Mail to the following this 25th day of September, 2000:

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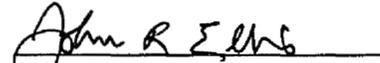
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