STATE OF FLORIDA

COMMISSIONERS: E. LEON JACOBS, JR., CHAIRMAN J. TERRY DEASON LILA A. JABER BRAULIO L. BAEZ MICHAEL A. PALECKI



OFFICE OF GENERAL COUNSEL HAROLD A. MCLEAN (850) 413-6199

Hublic Service Commission

October 1, 2001

VIA FACSIMILE

Lee Willis, Esquire Ausley & McMullen 227 South Calhoun Street Tallahassee, FL 32301

Re: Docket No. 010577-EI (GridFlorida)

Dear Lee:

As we discussed, staff wishes to offer as an exhibit or exhibits to be put in evidence certain of Tampa Electric Company's responses to staff discovery in this docket. Staff has preliminarily identified the following responses to interrogatories as material we wish to offer:

Interrogatories Nos. 7, 8, 11, 18-21, 24, 28-33A, 34-44, 50, 51-55, 57-66, 68, 77-79, 82, 83, 88-90, 92-98, 101-105, 107-113, 122, 136-150, 162

Staff also wishes to offer TECO's responses to Requests for Production of Documents Nos. 2, 4-8, and 11-15.

This list is preliminary because staff has not yet received and reviewed TECO's responses to Staff's Third Set of Interrogatories and Staff's Second Request for Production of Documents. After this review is complete, I will have a more precise list to provide you. However, I anticipate that the list provided will not change significantly. This preliminary list is offered as a starting point for TECO's consideration.

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I believe the majority of this material is related to Issues 2, 3, and 4 (estimated costs and benefits) and would be offered, in staff's view, as information to help complete the record on these issues rather than to prove or disprove any particular position.

Sincerely,

Wm. Cochran Keating IV

Staff Counsel

cc: Parties of Record