

ORIGINAL

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October 19, 2000

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

Re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor; FPSC Docket No. 000001-EI

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and ten (10) copies of Tampa Electric Company's Objections in Response to Staff's First Set of Interrogatories Nos. 1-18, propounded and served by U. S. Mail on October 10, 2000.

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
James D. Beasley

JDB/pp
Enclosures

cc: All parties of record (w/encls.)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery)	
Clause with Generating Performance Incentive)	DOCKET NO. 000001-EI
Factor.)	FILED: October 19, 2000
_____)	

**TAMPA ELECTRIC COMPANY'S OBJECTIONS IN RESPONSE TO
STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-18)**

Pursuant to Rule 1.340, Florida Rules of Civil Procedure and Rule 28-106.206, Florida Administrative Code, Tampa Electric Company ("Tampa Electric" or "the company"), by and through its undersigned counsel, hereby files its objections to the First Set of interrogatories (Nos. 1-18) served by the Staff of the Florida Public Service Commission ("Staff") on Tampa Electric and says:

Objections to Specific Request

1. Tampa Electric objects to Interrogatory No. 18 on the grounds that it calls for information that is speculative and not relevant to the subject matter of the Petition pending before the Commission in this proceeding.

2. The Company is anxious to provide the Commission and Staff with any information that is reasonably calculated to assist the Commission in its deliberations. However, Interrogatory No. 18 would require Tampa Electric to devote significant resources to the creation of an analysis that would be based on scenarios that are not relevant.

3. The exercise of exploring how IMC would have fared under the proposed interruptible service agreement if that agreement had been in effect between January 1998 and August 2000 is meaningful only if one assumes that the relevant circumstances extant during that

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period will recur and persist in the future. Tampa Electric respectfully suggests that there is no reasonable basis for that heroic assumption since the proposed rates were established on the basis of projected future circumstances.

WHEREFORE, Tampa Electric submits the foregoing objections to the First Set of Interrogatories (Nos. 1- 18) served by the Staff in this proceeding.

DATED this 19th day of October, 2000.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Objections in Response to Staff's First Set of Interrogatories (Nos. 1-18), filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (*) on this 19th day of October 2000 to the following:

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