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August 17, 1998

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VIA HAND DELIVERY

Blanca S. Bayo, Director Florida Public Service Commission Division of Records and Reporting Gunter Building 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0870

Re: Docket No. 980693-EI

Dear Ms. Bayo:

OTH

Enclosed for filing and distribution are the original and fifteen copies of the Florida Industrial Power Users Group's Objections to Tampa Electric Company's Discovery in the above docket.

Please acknowledge receipt of the above on the extra copy enclosed herein and return it to me. Thank you for your assistance.

2020-50	Sincerely,	RECLIVED & HILFD
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Tampa Electric Company) for Approval of Cost Recovery for a New) Environmental Program, the Big Bend Units) 1 and 2 Flue Gas Desulfurization System.

Docket No. 980693-EI

Filed: August 17, 1998

FIPUG'S OBJECTIONS TO TAMPA ELECTRIC COMPANY'S DISCOVERY

The Florida Industrial Power Users Group (FIPUG), pursuant to Order No. PSC-98-0864-PCO-EI, in an abundance of caution, files its objections to Tan pa Electric Company's (TECO) First Request for Production, Nos. 1-7. As grounds therefor, FIPUG states:

- The issues to which TECO's discovery is directed concern return on equity and cost of capital issues. Such issues have been deferred to a later proceeding and FIPUG will withdraw the testimony of its witness, Mr. Selecky, related to these issues.
- FIPUG has requested that TECO withdraw its discovery requests because the information sought is no longer relevant to this proceeding; however, TECO has not yet done so, though FIPUG expects that it will.
 - Thus, in an abundance of caution, FIPUG objects to TECO's discovery

requests on the grounds that they are not relevant.

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