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January 6, 1999

HAND DELIVERED

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32388-0850

Re: Adoption of Numeric Conservation Goals by Tampa Electric Company

FPSC Docket No. 971007-EG

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Response in Opposition to LEAF's Motion to Extend Discovery Schedule and Filing Date for LEAF's Testimony and Exhibits.

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.

ACK		
AFA		Sincerely,
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Adoption of Numeric)	
Conservation Goals by Tampa)	DOCKET NO. 971007-EG
Electric Company.)	FILED: January 6, 1999
)	

TAMPA ELECTRIC COMPANY'S RESPONSE IN OPPOSITION TO LEAF'S MOTION TO EXTEND DISCOVERY SCHEDULE AND FILING DATE FOR LEAF'S TESTIMONY AND EXHIBITS

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Fla. Admin. Code Rule 28-106.204, responds as follows in opposition to the Motion to Extend Discovery Schedule and Filing Date for LEAF's Testimony and Exhibits filed in this proceeding on December 30, 1998:

- 1. LEAF's latest procedural motion to extend the discovery schedule and the filing date for LEAF's testimony and exhibits is tardy and should be summarily denied. The procedural schedule in this docket was announced in the Commission's March 10, 1998 order establishing procedure¹ and has been common knowledge for the better part of a year.
- 2. Although LEAF's motion is not specific as to the extent of additional time requested, paragraph 8 of the motion could be construed to request an extension of LEAF's filing date for testimony and exhibits beyond the actual hearing date set forth in the order establishing procedure. This is entirely inappropriate and should be rejected.

WHEREFORE, Tampa Electric Company urges the Commission to deny LEAF's Motion to Extend Discovery Schedule and Filing Date for LEAF's Testimony and Exhibits.

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¹ Order PSC-98-0384-PCO-EG

DATED this 6 day of January, 1999.

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Respectfully submitted,

EEE L. WILLIS

JAMES D. BEASLEY

Ausley & McMullen

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Tallahassee, FL 32302

(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Response in Opposition to LEAF's Motion to Extend Discovery Schedule and Filing Date for LEAF's Testimony and Exhibits, filed on behalf of Tampa Electric Company, has been furnished by hand delivery (*) or U. S. Mail on this day of January, 1999 to the following:

Ms. Leslie Paugh*
Staff Counsel
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Florida Public Service Commission
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Tallahassee, FL 32399-0850

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ATTORNEY