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July 20, 1998

HAND DELIVERED

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

> Re: Petition by Tampa Electric Company for Approval of Cost Recovery for a new Environmental Program, the Big Bend Unit. 1 and 2 Flue Gas Desulfurization System; FPSC Docket No. 980693-E1

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of each of the following

- Tampa Electric Company's Written Response to Staff's First Request for Production of Documents (Nos. 1-35)
- 2 Tampa Electric Company's Written Response to FIPUG's First Request for Production of Documents (Nos. 1-6)

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. Bensley

DB/pp Enclosures

cc All Parties of Record (w/enc)

POD 1-3- POD 16.
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION RIGINAL

In re: Peti	tion by Tampa Electric
Company	for Approval of Cost Recovery
for a new	Environmental Program, the
Big Bend	Units 1 and 2 Flue Gas
	ation System.

DOCKET NO. 980693-EI FILED. July 20, 1998

TAMPA ELECTRIC COMPANY'S WRITTEN RESPONSE TO STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-35)

Tampa Electric Company responds as follows to Staff's First Request for Production of Documents Nos. 1-35 by saying that Tampa Electric will produce for inspection documents responsive to Staff's First Request for Production of Documents Nos 1-35 with the exception of any documents with respect to which any objection remains outstanding and subject to a notice of intent to seek confidential classification of certain limited portions of the documents to be produced.

DATED this 20 day of July, 1998.

Respectfully submitted.

KEE L WILLIS

JAMES D. BEASLEY

Ausley & McMullen

Post Office Box 391

Tallahassee, FL 32302

(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

DOCUMENT NUMBER-DATE 07615 JUL 20 #

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Written Response, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (*) on this 20 day of July, 1998 to the following:

Ms. Grace Jaye*
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevar
Tallahassee, FL 32399-0850

Mr. John W. McWhirter, Jr. McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A. Post Office Box 3350 Tampa, FL 33601 Mr. Joseph A. McGlothlin Ms. Vicki Gordon Kaufman McWhirter, Reeves, McGlothlin, Davidson, Rief & Bakas, P.A. 117 South Gadsden Street Tallahassee, FL 32301

ATORNEY

TEC 980693Response to Staff's 1" RFP