

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Allied Universal)
Corporation and Chemical Formulators,)
Inc. against Tampa Electric Company)
for violation of Sections 366.03,)
366.06(2) and 366.07, Florida Statutes,)
with respect to rates offered under)
Commercial/Industrial Service Rider tariff;)
petition to examine and inspect confidential)
information; and request for expedited)
relief.)
_____)

Docket No. 000061-EI

REBUTTAL TESTIMONY

OF

ROBERT M. NAMOFF

ON BEHALF OF

ALLIED UNIVERSAL CORPORATION

AND

CHEMICAL FORMULATORS, INC.

January 22, 2001

DOCUMENT NUMBER - DATE

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FPSC-REGULATORY REPORTING

1 **Q. Please state your name, address and business affiliation.**

2 A. My name is Robert M. Namoff. I am Chief Executive Officer of Allied
3 Universal Corporation ("Allied"). My business address is 8350 N.W. 93rd
4 Street, Miami, Florida 33166-2098.

5 **Q. Did you submit direct testimony in this proceeding?**

6 A. Yes, my direct testimony on behalf of Allied and its affiliate Chemical
7 Formulators, Inc. ("CFI") was submitted on February 21, 2000. Additionally,
8 I was given the opportunity to address the Commission at its Agenda
9 Conference on April 18, 2000 in response to the position of Tampa Electric
10 Company ("TECO") that Allied/CFI should not be permitted to inspect
11 TECO's records of its dealings with my company and with our business
12 competitor, Odyssey Manufacturing Company ("Odyssey").

13 **Q. What is the purpose of your rebuttal testimony?**

14 A. The purpose of my rebuttal testimony is to address Issues 1 through 5 stated
15 in the Draft Prehearing Order and to respond to the direct testimony of
16 Odyssey witness Stephen W. Sidelko concerning a further issue raised by his
17 testimony.

18 **Q. Issue 1 concerns TECO's response to Odyssey's request for CISR tariff**
19 **rates. What are your concerns with TECO's response to Odyssey's**
20 **request?**

21 A. I have three concerns with this issue that I understand are being presented to
22 the Florida Public Service Commission for determination in this case. Before

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stating those concerns, I want to thank the Commission for having been given the opportunity to see for myself many of TECO's records of their dealings with Odyssey and with my company. As I said to the Commission in my remarks on April 18, 2000, I do not need or want confidential trade secret information about Odyssey or about Odyssey's plant. What I want in this case is a fair rate for electrical power from TECO.

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Q. Does this conclude your rebuttal testimony?

A. Yes.