

AUSLEY & MCMULLEN

RECEIVED FPSC

ATTORNEYS AND COUNSELORS AT LAW

123 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

11 AUG 24 PM 3:00

COMMISSION
CLERK

August 24, 2011

HAND DELIVERED

Ms. Ann Cole, Director
Division of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Fuel and Purchased Power Cost Recovery Clause with Generating
Performance Incentive Factor; FPSC Docket No. 110001-EI

Dear Ms. Cole:

Enclosed for filing in the above docket is the original and one copy of Tampa Electric Company's Answer to Second Request for Production of Documents (Nos. 14-21) of the Florida Public Service Commission Staff, propounded and served by electronic and U. S. Mail on July 25, 2011.

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

JDB/pp
Enclosure

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

- COM _____
- APA _____
- ECR I
- GCL _____
- RAD _____
- SRC _____
- ADM _____
- OPC _____
- CLK _____

DOCUMENT NUMBER-DATE
06104 AUG 24 =
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery)
Clause with Generating Performance Incentive)
Factor.)
_____)

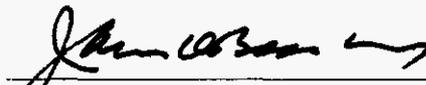
DOCKET NO. 110001-EI
FILED: August 24, 2011

**TAMPA ELECTRIC COMPANY'S ANSWER TO THE
FLORIDA PUBLIC SERVICE COMMISSION STAFF'S
SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 14-21)**

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, Tampa Electric Company ("Tampa Electric" or "the company") files this its Answer to the Florida Public Service Commission Staff's Second Request for Production of Documents (Nos. 14-21) propounded and served on July 25, 2011. The company is this date furnishing the requested documents to the Commission's Staff accompanied by a Request for Confidential Classification and Motion for a Temporary Protective Order.

DATED this 24th day of August 2011.

Respectfully submitted,



JAMES D. BEASLEY
J. JEFFRY WAHLEN
Ausley & McMullen
Post Office Box 391
Tallahassee, Florida 32302
(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

DOCUMENT NUMBER-DATE

06104 AUG 24 =

FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Answer to Staff's Second Request for Production of Documents, filed on behalf of Tampa Electric Company, has been furnished by U.S. Mail or hand delivery (*) on this 24th day of August 2011 to the following:

Ms. Lisa C. Bennett*
Senior Attorney
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0863

Mr. John T. Burnett
Ms. Dianne M. Triplett
Progress Energy Service Co., LLC
Post Office Box 14042
St. Petersburg, FL 33733-4042

Mr. Paul Lewis, Jr.
106 East College Avenue
Suite 800
Tallahassee, FL 32301-7740

Ms. Vicki Kaufman
Mr. Jon C Moyle
Keefe Anchors Gordon & Moyle, PA
118 N. Gadsden Street
Tallahassee, FL 32301

Ms. Patricia A. Christensen
Associate Public Counsel
Office of Public Counsel
111 West Madison Street – Room 812
Tallahassee, FL 32399-1400

Ms. Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 S. Monroe St., Suite 618
Tallahassee, FL 32301

Karen S. White, Staff Attorney
c/o AFCESA-ULFSC
139 Barnes Drive, Suite 1
Tyndall AFB, FL 32403-5319

Mr. Tom Geoffroy
Florida Public Utilities Company
P. O. Box 3395
West Palm Beach, FL 33402-3395

Mr. John T. Butler
Managing Attorney - Regulatory
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420

Mr. Kenneth Hoffman
Florida Power & Light Company
215 South Monroe Street, Suite 810
Tallahassee, FL 32301-1859

Ms. Susan Ritenour
Secretary and Treasurer
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0780

Mr. Jeffrey A. Stone
Mr. Russell A. Badders
Mr. Steven R. Griffin
Beggs & Lane
Post Office Box 12950
Pensacola, FL 32591-2950

Mr. Robert Scheffel Wright
Mr. John T. LaVia, III
Young van Assenderp, P.A.
225 South Adams Street, Suite 200
Tallahassee, FL 32301

Mr. Randy B. Miller
White Springs Agricultural Chemicals, Inc.
Post Office Box 300
White Springs, FL 32096

Ms. Cecilia Bradley
Senior Assistant Attorney General
Office of the Attorney General
The Capitol – PL01
Tallahassee, FL 32399-1050

Mr. James W. Brew
Mr. F. Alvin Taylor
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, D.C. 20007-5201

Mr. Patrick K. Wiggins
Post Office Drawer 1657
Tallahassee, FL 32302

Mr. Dan Moore
AFFIRM
316 Maxwell Road, Suite 400
Alpharetta, GA 30009



ATTORNEY