

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Tampa Electric Company's Petition ) Docket No. 992014-EI
For approval of its plan to bring its ) Filed: February 23, 2000
Generating units into compliance with )
The Clean Air Act. )

LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION, INC.
NOTICE OF SERVICE OF SECOND SET OF INTERROGATORIES
(NOS. 24-27)
AND SECOND SET OF PRODUCTION OF DOCUMENTS REQUESTS
(NOS. 9-10) TO TAMPA ELECTRIC CO.

LEAF files Notice that it has served its Second Set of Interrogatories (Nos. 24-27) and its Second Set of Production of Documents Requests (Nos. 9-10) to Tampa Electric Co. by hand delivery (\*) or by U.S. Mail to the following parties of record on February 23, 2000.

Grace Jaye
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Tallahassee, FL 32301
John McWhirter
McWhirter Reeves
PO Box 3350
Tampa, FL 33601-3350

Lee Willis/James Beasley\*
Ausley Law Firm
PO Box 391
Tallahassee, FL 32302

Michael G. Briggs
Reliant Energy Power Generation
PO Box 61867
Houston, TX 77208-1867

Ms. Angela Llewellyn
Regulatory Affairs
Tampa Electric Co.
PO Box 111
Tampa, FL 33601-0111

Joseph McGlothlin
McWhirter Reeves
117 S. Gadsden Street
Tallahassee, FL 32301

Jack Shreve
Office of Public Counsel
111 W. Madison St., Suite 812
Tallahassee, FL 32399-1400

Gail Kamaras
Legal Environmental Assistance
Foundation, Inc.
1114 Thomasville Road, Suite E
Tallahassee, FL 32303
850-681-2591; 850-224-1275 fx
gkamaras@lewisweb.net

Vicki Gordon Kaufman
McWhirter Reeves
117 S. Gadsden St

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APP
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DOCUMENT NUMBER-DATE

02506 FEB 23 8

FPSC-RECORDS/REPORTING

no copy filed

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For approval of its plan to bring its )  
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Docket No. 992014-EI  
Filed: February 23, 2000

**LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION, INC.**

**SECOND SET OF INTERROGATORIES TO**

**TAMPA ELECTRIC CO. (NOS. 24-27)**

LEAF, through its undersigned attorney, asks the following interrogatories, pursuant to Rule 1.340, Florida Rules of Civil Procedure (FRCP) and Rule 28-106.206, Florida Administrative Code (FAC), to Tampa Electric Company (TECO). These interrogatories shall be answered under oath by you or your agent who is qualified and shall be identified, with the answers being served as provided by the above rules. Each interrogatory shall be answered separately and fully in writing unless objected to. Each answer shall be signed by the person making it. Please answer these interrogatories within twenty (20) days of service.

Please provide the name, address and relationship to TECO of each person providing the answers to each interrogatory. If an interrogatory asks for information that has already been provided or is being provided to another party to this proceeding, please so state.

24. Please describe in detail the results of the BACT analysis referred to on page 14 of the testimony of Mr. Nelson.

25. Please explain why TECO's projected emission reductions are compared to emissions in 1997 rather than 1998 or 1999 (the last year of Phase I under Title IV) as referenced in Mr. Nelson's testimony at page 16.

a. Please explain what emissions were or would have been "expected in 2010" as referenced at page 16, line 14.

26. Please state what, if any changes TECO made between its December 1999 Plan filed with its Petition and the January 2000 Plan filed as an exhibit to Mr. Nelson's testimony and state the reason for each change.

27. Please clarify what is meant by fuel switching versus re-powering as referenced on page 12 of Mr. Ward's testimony.



Gail Kamaras

Legal Environmental Assistance Foundation, Inc.  
1114 Thomasville Road, Suite E  
Tallahassee, FL 32303-6290  
(850) 681-2591; (850)-224-1275 fx

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**LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION, INC.**  
**SECOND SET OF PRODUCTION OF DOCUMENTS REQUESTS TO**  
**TAMPA ELECTRIC CO. (NOS. 9-10)**

Pursuant to Uniform Rule 28-106.206, Florida Administrative Code and Rule 1.350, Florida Rules of Civil Procedure, LEAF, through its undersigned attorney, serves the following Request for Production of Documents on Tampa Electric Co. (TECO).

Please produce the following documents at the LEAF office, 1114 Thomasville Road, Suite E, Tallahassee, FL, 32303, no later than twenty days after service of this request for the purpose of inspection and copying.

**DEFINITIONS**

The word "documents" means the original and any non-identical copies of any writing or record, including any book, pamphlet, periodical, letter, memorandum, report, study, handwritten note, electronic communication, working paper, chart, graph, survey, disk, data sheet, computerized record or any other recorded matter.

9. Please produce the ESP optimization study referenced as recently complete in Mr. Nelson's testimony at page 14.

10. Please produce the BACT analysis referenced at page 14 of Mr.

Nelson's testimony.

*Gail Kamaras*

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1114 Thomasville Road, Suite E  
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(850) 681-1591; (850) 224-1275 fx