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**ORIGINAL**

May 22, 2000

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**BY HAND DELIVERY**

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

Re: Determination of regulated earnings of Tampa Electric Company pursuant to stipulations for calendar years 1995 through 1999; Docket No. 950379-EI

Dear Ms. Bayo:

Enclosed for filing in the above docket are fifteen (15) copies of Tampa Electric Company's Objections, Motion for Protective Order and Written Response to the Florida Industrial Power User Group's First Request for Production (Nos. 1-9) and Second Set of Interrogatories (Nos. 11-36) and Motions for Protective Order.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,

  
James D. Beasley

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of regulated earnings	)	DOCKET NO. 950379-EI
of Tampa Electric Company pursuant to	)	
stipulations for calendar years 1995 through 1999	)	Filed: May 22, 2000
	)	

**TAMPA ELECTRIC COMPANY'S OBJECTIONS,  
WRITTEN RESPONSE TO THE  
FLORIDA INDUSTRIAL PUBLIC UTILITY GROUPS  
SECOND SET OF INTERROGATORIES (NOS. 11-36)  
AND MOTION FOR PROTECTIVE ORDER**

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to the Commission's Order Establishing Procedure (Order No. PSC-96-0272-PCO-EI, dated February 26, 1996), submits the following Objections and Motion for Protective Order in response to Florida Industrial Public Utility Group's ("FIPUG") Second Set of Interrogatories to Tampa Electric Company (Nos. 11-36) and, as grounds therefor, says:

**Preliminary Nature of These Objections**

The objections stated herein are preliminary in nature and should additional grounds for objections be discovered as Tampa Electric attempts to prepare its answers to interrogatories in this proceeding, the company reserved the right to supplement or advise or modify its objections. Should Tampa Electric determine that a further protective order is necessary with respect to any of the information requested, Tampa Electric reserves the right to file a motion with the Commission seeking such an order at the time it serves its written answers to FIPUG.

Tampa Electric Company makes the following objections to FIPUG's Second Set of Interrogatories in this proceeding.

1. Tampa Electric objects to that portion of Interrogatory No. 15 which requests information with respect to affiliates, which includes affiliates with operations in foreign countries, on the ground that such information is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this proceeding.

**Motion for Protective Order**

2. Tampa Electric's objections to FIPUG's discovery requests are submitted pursuant to the authority contained in Slatnick v. Leadership Housing Systems of Florida, Inc., 368 So.2d 79 (Fla. 3<sup>rd</sup> DCA 1979). To the extent that a Motion for Protective Order is required, Tampa Electric's objections are to be construed as a request for a Protective Order.

WHEREFORE, Tampa Electric submits the foregoing as its Objections and Motion for Protective Order relative to FIPUG's Second Set of Interrogatories (Nos. 11-36).

DATED this 22<sup>nd</sup> day of May, 2000.

Respectfully submitted,



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Ausley & McMullen  
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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

**CERTIFICATE OF SERVICE**


I HEREBY CERTIFY that a true copy of the foregoing Objections and Motion for Protective Order relative to FIPUG's Second Set of Interrogatories (Nos. 11-36), filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (\*) on this 22<sup>nd</sup> day of May, 2000 to the following:

Mr. Robert V. Elias\*  
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Division of Legal Services  
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