## AUSLEY & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

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

September 2, 2005

#### HAND DELIVERED

Ms. Blanca S. Bayo, Director Division of Commission Clerk and Administrative Services 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. 050001-EI

Dear Ms. Bayo:

Enclosed for filing in the above docket is the original and one copy of Tampa Electric Company's Answer to First Request for Production of Documents (Nos. 1-2) of the Staff of the Florida Public Service Commission, propounded and served by U. S. Mail on August 2, 2005.

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.)

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery	)	
Clause with Generating Performance Incentive	)	DOCKET NO. 050001-EI
Factor.	)	FILED: September 2, 2005
	)	

# TAMPA ELECTRIC COMPANY'S ANSWER TO THE FLORIDA PUBLIC SERVICE COMMISSION STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-2)

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") answers the Staff's First Request for Request for Production of Documents (Nos. 1-2) saying that it has produced the requested documents for Staff's review on a confidential basis.

WHEREFORE, Tampa Electric submits the foregoing as its answer to Request for Production of Documents to Tampa Electric Company (Nos. 1-2).

DATED this 2 day of September 2005.

Respectfully submitted,

LEW WILLIS

JAMES D. BEASLEY

Ausley & McMullen

Post Office Box 391

Tallahassee, Florida 32302

(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Answer has been furnished by U. S.

Mail or hand delivery (\*) on this \_\_\_\_day of September 2005 to the following:

Ms. Adrienne E. Vining\* Senior Attorneys Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0863

Mr. James A. McGee Associate General Counsel Progress Energy Florida, Inc. Post Office Box 14042 St. Petersburg, FL 33733

Mr. Gary V. Perko Hopping Green & Sams P.A. P.O. Box 6526 Tallahassee, FL 32314

Mr. Timothy J. Perry McWhirter, Reeves, McGlothlin, Davidson, Kaufman & Arnold, P.A. 117 S. Gadsden Street Tallahassee, FL 32301

Mr. John W. McWhirter, Jr. McWhirter, Reeves, McGlothlin, Davidson, Kaufman & Arnold, P.A. 400 North Tampa Street, Suite 2450 Tampa, FL 33601-5126

Ms. Patricia A. Christensen Associate Public Counsel Office of Public Counsel 111 West Madison Street -- Room 812 Tallahassee, FL 32399-1400 Mr. Norman Horton Messer Caparello & Self Post Office Box 1876 Tallahassee, FL 32302

Ms. Cheryl Martin Florida Public Utilities Company P. O. Box 3395 West Palm Beach, FL 33402-3395

Mr. John T. Butler Steel Hector & Davis LLP 200 South Biscayne Boulevard Suite 4000 Miami, FL 33131-2398

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

Mr. R. Wade Litchfield Florida Power & Light Company 700 Universe Blvd. Juno Beach, FL 33408

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

Mr. Jeffrey A. Stone Mr. Russell A. Badders Beggs & Lane Post Office Box 12950 Pensacola, FL 32591-2950 Mr. Jon C. Moyle, Jr. Moyle, Flanigan, Katz, Raymond & Sheehan, P.A. 118 N. Gadsden Street Tallahassee, FL 32301

Mr. Robert Scheffel Wright Mr. John T. LaVia, III Landers & Parsons, P.A. 310 West College Avenue Tallahassee, FL 32301 Mr. Mark Hoffman Legal Department CSX Transportation 500 Water Street, 14<sup>th</sup> Floor Jacksonville, FL 32202

ATTORNEY