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

October 27, 2006

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: Petition for approval of new environmental program for cost recovery through Environmental Cost Recovery Clause by Tampa Electric Company FPSC Docket No. 050958-EI

Dear Ms. Bayo:

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Enclosed for filing in the above docket is the original and one copy of Tampa Electric Company's Answer to the First Request for Production of Documents (Nos. 1-19) of the Citizens of the State of Florida, propounded and served by U.S. Mail on September 22, 2006.

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.)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Petition for Approval of New Environmental Program for Cost Recovery through Environmental Cost Recovery Clause by Tampa Electric Company.

DOCKET NO. 050958-EI FILED: October 27, 2006

TAMPA ELECTRIC COMPANY'S ANSWER TO FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-19) <u>OF THE CITIZENS OF THE STATE OF FLORIDA</u>

Tampa Electric Company has this date furnished by hand delivery to Ms. Patricia A. Christensen, Associate Public Counsel, c/o The Florida Legislature, 111 West Madison Street, Room 812, Tallahassee, FL 32399-1400, its Answers to the Citizens' First Request for Production of Documents (Nos. 1-19), propounded and served by U. S. Mail on September 22, 2006.

DATED this 27 day of October 2006.

Respectfully submitted,

IGE L. 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 and correct copy of the foregoing Answer to Citizens' First

Request for Production of Documents, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (*) on this 27 day of October 2006 to the following:

Ms. Martha Carter Brown* Office of General Counsel Florida Public Service Commission Room 370N – Gerald L. Gunter Building 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 Mr. Myron Rollins Black & Veatch Corporation 11401 Lamar Avenue Overland Park, KS 66211

Ms. Patricia A. Christensen* Associate Public Counsel Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400

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