# 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

March 3, 2008

## HAND DELIVERED

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

Re:

Fuel and Purchased Power Cost Recovery Clause with Generating Performance

Incentive Factor; FPSC Docket No. 080001-EI

Dear Ms. Cole:

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. 1-8) of the Florida Public Service Commission Staff, propounded and served by U. S. Mail on February 1, 2008.

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,

	•
CMP	_
COM	An Ossen
CTR	James D. Beasley
ECRJDB/pp	
GCL Enclosure	
OPCc: All Parties of Record (w/enc.)	
RCA	
SCR	
SGA	
SEC	DOCUMENT NUMBER-DATE
OTH	01563 MAR-3 #

FPSC-COMMISSION CLERK

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery	)	
Clause with Generating Performance Incentive	)	DOCKET NO. 080001-EI
Factor.	)	FILED: March 3, 2008
	)	

# TAMPA ELECTRIC COMPANY'S ANSWER TO THE FLORIDA PUBLIC SERVICE COMMISSION STAFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-8)

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 First Request for Production of Documents (Nos. 1-8) propounded and served on February 1, 2008. 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. Additionally, inasmuch as certain of the documents requested contain proprietary information about Tampa Electric's 2007 purchased power RFP activities, Tampa Electric will make those documents available in the offices of Ausley & McMullen in Tallahassee, Florida on a date and time convenient for Staff.

DATED this **3** day of March 2008.

Respectfully submitted,

LEE L. WILLIS
JAMES D. BEASLEY
Ausley & McMullen
Post Office Box 391
Tallahassee, Florida 32302

(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY DOCUMENT NUMBER - DATE

01563 MAR-38

FPSC-COMMISSION CLERK

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Answer, filed on behalf of Tampa

Electric Company, has been furnished by U. S. Mail or hand delivery (\*) on this 3 day of

March 2008 to the following:

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

Mr. John T. Burnett Associate General Counsel 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

Mr. John W. McWhirter, Jr. McWhirter, Reeves & Davidson, 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, P.A. Post Office Box 15579 Tallahassee, FL 32317

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

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

Mr. Wade Litchfield 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. Michael B. Twomey Post Office Box 5256 Tallahassee, FL 32314-5256

Karen S. White, Lt Col, USAF Damund E. Williams, Capt., USAF AFLSA/JACL-ULT 139 Barnes Drive, Suite 1 Tyndall Air Force Base, FL 32403-5319 Ms. Cecilia Bradley Senior Assistant Attorney General Office of the Attorney General The Capitol – PL01 Tallahassee, FL 32399-1050

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

ATTORXEY ATTORXEY