

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

December 4, 2008

HAND DELIVERED

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

RECEIVED-FPSC
08 DEC -4 AM 10:57
COMMISSION
CLERK

Re: Petition for Rate Increase by Tampa Electric Company
FPSC Docket No. 080317-EI

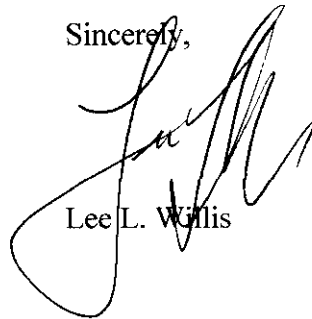
Dear Ms. Cole:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Preliminary Objections to FIPUG's Seventh Set of Interrogatories (Nos. 55-71).

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,



Lee L. Willis

COM _____
ECR _____
GCL 4 LLW/pp
Enclosure
OPC _____
RCP 1 cc: All Parties of Record (w/enc.)
SSC 1 _____
SGA 2 _____
ADM _____
CLK _____

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FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase)
by Tampa Electric Company.)
_____)

DOCKET NO. 080317-EI

FILED: December 4, 2008

**TAMPA ELECTRIC COMPANY'S PRELIMINARY OBJECTIONS
TO FIPUG'S SEVENTH SET OF INTERROGATORIES (NOS. 55-71)**

Tampa Electric Company ("Tampa Electric" or the "company") submits the following Preliminary Objections to FIPUG's Seventh Set of Interrogatories, specifically Nos. 61, 62 and 71.

I. General Objections.

Tampa Electric asserts the following general objections to FIPUG's Seventh Interrogatories, Nos. 55-71:

1. Tampa Electric objects to each and every individual interrogatory to the extent it calls for information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law, whether such privilege or protection appears at the time response is first made or is later determined to be applicable for any reason. Tampa Electric in no way intends to waive any such privilege or protection.

2. Tampa Electric objects to each individual interrogatory to the extent it requires production of information that is proprietary, confidential business information without provisions in place to protect the confidentiality of the information. Tampa Electric in no way intends to waive claims of confidentiality and will only produce such information subject to protective order, the Commission's rule on confidentiality and non-disclosure agreements for

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FPSC-COMMISSION CLERK

consultants hired by FIPUG. In order to facilitate FIPUG's review, Tampa Electric will produce confidential documents subject to the execution of a mutually agreeable non-disclosure agreement between Tampa Electric and FIPUG (and its consultants, attorneys and members who will have access to information claimed by Tampa Electric to be confidential). Documents and interrogatory answers that are confidential will be identified and separated for review by FIPUG.

3. Tampa Electric objects to any definition or instruction or question in any interrogatory that seeks information from persons or entities who are not parties to this proceeding or that are not subject to discovery under applicable rules.

4. Tampa Electric objects to each interrogatory to the extent that it seeks information that is not relevant to the subject matter of this docket and is not reasonably calculated to lead to the discovery of admissible evidence.

5. Tampa Electric objects to each and every interrogatory to the extent it is vague, ambiguous, overly broad, burdensome, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such discovery requests. The company will attempt to seek clarification in accordance with the Order on Procedure in this docket.

6. Tampa Electric objects on grounds of relevancy to each interrogatory seeking information relating to transactions or other business activity of Tampa Electric's non-regulated sister companies where Tampa Electric was not a party to the transaction or a participant in the business activity.

7. Tampa Electric expressly reserves and does not waive any objections it may have to the admissibility, authenticity or relevancy of the information provided in its responses to the subject interrogatories.

8. Tampa Electric objects to any attempt by the party seeking discovery to evade any numerical limitations set on interrogatories by asking multiple independent discovery requests within single individual discovery requests and subparts thereof. By making these general objections at this time, Tampa Electric does not waive or relinquish its right to assert additional general and specific objections to the subject discovery at the time Tampa Electric's response is due.

III. Specific Objections.

In addition to the general objections set forth above, which are incorporated herein by reference as to each and every interrogatory contained in FIPUG's Seventh Set of Interrogatories (Nos. 55-71), Tampa Electric asserts the following specific objections:

61. List all customers interrupted or curtailed, by customer account in order of curtailment or interruption, during the September 29, 2008 system event.

Objections: In addition to its general objections, which are incorporated herein by reference, the Company objects to this interrogatory on grounds that it is overbroad, burdensome and irrelevant.

62. List all customers interrupted or curtailed, by customer account in order of curtailment or interruption, during the September 30, 2008 system event.

Objections: In addition to its general objections, which are incorporated herein by reference, the Company objects to this interrogatory on grounds that it is overbroad, burdensome and irrelevant.

71. For each purchase made under TECO's Optional Provision for 2003 to date, provide:

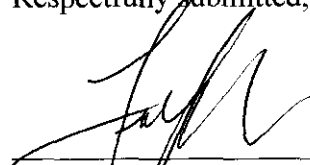
- a. The date of each purchase;

- b. The starting time of each purchase;
- c. The ending time of each purchase;
- d. The MWhs purchased;
- e. The purchased energy cost (excluding the administrative adder) for each optional purchase.

Objections: In addition to its general objections, which are incorporated herein by reference, the Company objects to this interrogatory on grounds that it is overbroad, burdensome and irrelevant.

DATED this 4th day of December 2008.

Respectfully submitted,



LEE L. WILLIS
JAMES D. BEASLEY
KENNETH R. HART
J. JEFFRY WAHLEN
Ausley & McMullen
Post Office Box 391
Tallahassee, FL 32302
(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Objections to FIPUG's Seventh Interrogatories (Nos. 55-71), filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (*) on this 4th day of December 2008 to the following:

Keino Young/Martha Brown*
Jennifer Brubaker/Jean Hartman
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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

Robert Scheffel Wright
John T. LaVia, III
Young van Assenderp, P.A.
225 South Adams Street, Suite 200
Tallahassee, FL 32301

Vicki Gordon Kaufman*
Jon C. Moyle, Jr.
Anchors Smith Grimsley
118 North Gadsden Street
Tallahassee, FL 32301

John W. McWhirter, Jr.
McWhirter, Reeves & Davidson, P.A.
Post Office Box 3350
Tampa, FL 33601-3350

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

Cecilia Bradley
Office of the Attorney General
The Capitol - PL 01
Tallahassee, FL 32399-1050



ATTORNEY