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Ruth Nettles

From: Jim Beasley [jbeasley@ausley.com]
Sent: Friday, June 26, 2009 4:03 PM
To: Filings@psc.state.fl.us
Cc: Katherine Fleming
Subject: Docket 080409-EG -TECO's Objection to Staff Sixth Set of Interrogatories (No. 33)
Attachments: Obj Staff IRR #33.pdf



Obj Staff IRR
#33.pdf (34 KB)

Electronic filing

a. Person responsible for this electronic filing:

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b. Docket No. 080409-EG

In re: Commission review of numeric conservation goals (Tampa Electric Company)

c. The document is being filed on behalf of Tampa Electric Company

d. There is a total of 3 pages, plus cover letter

e. The document attached for electronic filing is Tampa Electric Company's June 26, 2009 Objection to Florida Public Service Commission Staff's Sixth Set of Interrogatories (No. 33)

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June 26, 2009

Via: Electronic Filing

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

Re: Commission review of numeric conservation goals (Tampa Electric Company);
FPSC Docket No. 080409-EG

Dear Ms. Cole:

Enclosed for filing in the above docket is Tampa Electric Company's Objection to the Florida Public Service Commission Staff's Sixth Set of Interrogatories (No. 33).

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

In re: Commission review of numeric)
Conservation Goals (Tampa Electric Company).)
_____)

DOCKET NO. 080409-EG

FILED: June 26, 2009

**TAMPA ELECTRIC COMPANY'S OBJECTION TO THE
FLORIDA PUBLIC SERVICE COMMISSION STAFF'S
SIXTH SET OF INTERROGATORIES (NO. 33)**

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Rule 1.340, Florida Rules of Civil Procedure, and Rule 28-106.206, Florida Administrative Code, submits the following objection to Interrogatory No. 33 contained in Staff's Sixth Set of Interrogatories to Tampa Electric Company (Nos. 21-33) and says:

1. Included in Staff's Sixth Set of Interrogatories is Interrogatory No. 33 which reads as follows:

33. Please complete the following four tables showing the projected rates in cents per kilowatt hour (¢kWh) and projected customer bills in dollars per 1,200 kilowatt hours (\$/1,200 kWh) for the ten year period, 2010 to 2019, in nominal and net present value amounts for the Base Case (assumes no DSM), DSM based on RIM test, and DSM based on TRC, each with and without CO₂ costs.

2. Tampa Electric objects to Interrogatory No. 33 on the grounds that to answer it Tampa Electric would have to create information and results which do not presently exist and which cannot be addressed without imposing an undue burden on the company. To answer this interrogatory Tampa Electric would have to perform exhaustive and very costly studies and essentially restart the entire process it has engaged in to date in this docket. Tampa Electric would need to enlist the assistance of Itron to recreate Tampa Electric's basis for demand side management goal setting to fit an additional case that assumes no CO₂ costs. Such an effort

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would be extremely time consuming and costly and would effect an undue burden on Tampa Electric.

3. Notwithstanding this objection, and without waiving it, Tampa Electric will attempt to provide information explaining to the best of its ability the impact of CO₂ on its economic analyses to address the subject matter of Staff's Interrogatory No. 33.

DATED this 26th day of June, 2009.

Respectfully submitted,



LEE L. WILLIS
JAMES D. BEASLEY
Ausley & McMullen
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(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Objection to Staff's Sixth Set of Interrogatories (No. 33), filed on behalf of Tampa Electric Company, has been furnished electronically* or U. S. Mail on this 26th day of June 2009 to the following:

Ms. Katherine E. Fleming*
Senior Attorney
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