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September 12, 2014

VIA: ELECTRONIC FILING

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

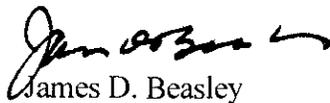
Re: Environmental Cost Recovery Clause
FPSC Docket No. 140007-EI

Dear Ms. Stauffer:

Attached for filing in the above docket is the original of Tampa Electric Company's Objections to the Southern Alliance for Clean Energy's First Set of Interrogatories (Nos. 1-3) and First Request for Production of Documents (Nos. 1-3).

Thank you for your assistance in connection with this matter.

Sincerely,


James D. Beasley

JDB/pp
Attachment

cc: All Parties of Record (w/attachment)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost)
Recovery Clause.)
_____)

DOCKET NO. 140007-EI

FILED: September 12, 2014

**TAMPA ELECTRIC COMPANY'S OBJECTIONS
TO THE SOUTHERN ALLIANCE FOR CLEAN ENERGY'S
FIRST SET OF INTERROGATORIES (NOS. 1-3) AND
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-3)**

Tampa Electric Company ("Tampa Electric" or the "company"), pursuant to Rule 1.340 and 1.350, Florida Rules of Civil Procedure, Rule 28-106.206, Florida Administrative Code and this Commission's Order Establishing Procedure PSC-14-0087-PCO-EI, submits the following objections to the Southern Alliance for Clean Energy's ("SACE's") First Set of Interrogatories (Nos. 1-3) and First Request for Production of Documents (Nos. 1-3).

I. Preliminary Nature of These Objections

1. Tampa Electric objections stated herein are preliminary in nature. Tampa Electric is furnishing its objections consistent with the time frame set forth in the Commission's Order Establishing Procedure, Order No. PSC-14-0087-PCO-EI. Should additional grounds for objection be discovered as Tampa Electric develops its responses, Tampa Electric reserves the right to supplement or modify its objections up to the time it serves its responses. Should Tampa Electric determine that a protective order is necessary regarding any of the information requested of Tampa Electric, Tampa Electric reserves the right to file a motion with the Commission seeking such an order at the time its response is due.

II. General Objections

2. Tampa Electric objects to each and every interrogatory request for documents that 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 such privilege or protection. The nature of the document(s), if any, will be described in a privilege log prepared by Tampa Electric.

3. In certain circumstances, Tampa Electric may determine, upon investigation and analysis, that information responsive to certain discovery requests to which objections are not otherwise asserted are confidential and proprietary and should be produced only with provisions in place to protect the confidentiality of the information, if at all. By agreeing to provide such information in response to such request, Tampa Electric is not waiving its right to insist upon appropriate protection of confidentiality by means of a protective order or other action to protect the confidential information requested. Tampa Electric asserts its right to require such protection of any and all documents that may qualify for protection under the Florida Rules of Civil Procedure and other applicable statutes, rules and legal principles.

4. Tampa Electric is a large corporation with employees located in many different locations. In the course of its business, Tampa Electric creates numerous documents that are not subject to Florida Public Service Commission or other governmental record retention requirements. These documents are kept in numerous locations and frequently are moved from site to site as employees change jobs or as business is reorganized. Therefore, it is possible that not every relevant document may have been consulted in developing Tampa Electric's response.

Rather, these responses provide all the information that Tampa Electric obtained after a reasonable and diligent search conducted in connection with this discovery request. To the extent that the discovery requests propose to require more, Tampa Electric objects on the grounds that compliance would impose an undue burden or expense on Tampa Electric.

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

6. Tampa Electric objects to each request to the extent it is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such discovery requests.

7. Tampa Electric also objects to these discovery requests to the extent they call for Tampa Electric to prepare information in a particular format or perform calculations or analyses not previously prepared or performed as purporting to expand Tampa Electric's obligations under applicable law. Tampa Electric will comply with its obligations under the applicable rules of procedure.

8. Tampa Electric objects to providing information to the extent that such information is already in the public record before a public agency and available through normal procedures or is readily accessible through legal search engines.

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

10. Tampa Electric objects to each and every discovery request that calls for the production of documents and/or disclosure of information from any entity other than Tampa

Electric that does not deal with transactions or cost allocations between Tampa Electric and any other entity. Such documents and/or information do not affect Tampa Electric's rates or cost of service to Tampa Electric's customers. Therefore, those documents and/or information are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Furthermore, Tampa Electric is the party appearing before the Florida Public Service Commission in this docket. To require any non-regulated entities to participate in irrelevant discovery is by its very nature unduly burdensome and overbroad. To the extent any responsive documents contain irrelevant affiliate information as well as information related to Tampa Electric and Tampa Electric's rates or cost of service charged to its customers, Tampa Electric may redact the irrelevant affiliate information from the responsive documents.

11. Tampa Electric objects to any production location other than at its Tampa office, located at 702 North Franklin Street, Tampa, Florida 33602, unless otherwise agreed by the parties.

12. Tampa Electric objects to each and every discovery request and any instructions that purport to expand Tampa Electric's obligations under applicable law.

13. In addition, Tampa Electric reserves its right to count discovery requests and their sub-parts, as permitted under the applicable rules of procedure, in determining whether it is obligated to respond to additional discovery requests served by any party.

14. Tampa Electric expressly reserves and does not waive any and all obligations it may have to the admissibility, authenticity or relevancy of the information provided in its responses.

15. Tampa Electric objects to any attempt by the party seeking discovery to evade any numerical limitations set on interrogatories or requests 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.

16. Subject to the foregoing general objections, Tampa Electric nevertheless will provide interrogatory answers and produce documents responsive to all relevant discovery requests not specifically objected to, to the extent the company possesses the information and/or documents in question.

III. Specific Objections

In addition to the foregoing General Objections, Tampa Electric makes the following specific objections to SACE's discovery:

17. Tampa Electric objects to SACE's Interrogatory No. 1, which reads as follows:
1. Please identify analysis or assessment prepared by or for TECO since January 1, 2013 of the economics, regulatory requirements, feasibility, or technology options related to continued operation, conversion, retirement or life extension of any of TECO's coal-fired generating units.

Basis for Objection: Tampa Electric objects to this interrogatory on the ground that it calls for irrelevant information which is not likely to lead to the discovery of admissible evidence. The subject matter of this interrogatory has nothing to do with this docket. Tampa Electric is not proposing any new projects involving coal-fired generating units or any environmental cost recovery with respect to the same. The requested information has nothing to do with true-up information relating to 2013, actual/estimated submissions regarding 2014, or any proposed cost recovery for 2015.

18. Tampa Electric objects to SACE's Interrogatory No. 2 to the extent that it seeks information relating to major maintenance costs. Interrogatory No. 2 reads as follows:

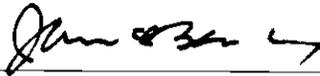
2. Please identify whether the TECO's forecasts for environmental or major maintenance costs are modeled as a stream of relatively uniform costs, or whether they are modeled based on typical construction cost schedules that assume specific dates for environmental or major maintenance projects.

Basis for Objection: Tampa Electric objects to this interrogatory, to the extent it seeks information relating to major maintenance costs, on the ground that it is irrelevant information which is not likely to lead to the discovery of admissible evidence. Major maintenance costs are costs that are recovered through base rates. That subject is beyond the scope of this docket and has nothing to do with the true-up data filed for 2013, the actual/estimated data relating to 2014 or projected cost recovery data for 2015.

19. Tampa Electric objects to SACE's Request for Production of Documents Nos. 1 and 2 on the same grounds and to the same extent the company has objected to SACE's Interrogatories Nos. 1 and 2, to which these document requests relate.

DATED this 12th day of September, 2014.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Objections to SACE's First Set of Interrogatories (Nos. 1-3) and First Request for Production of Documents (Nos. 1-3), filed on behalf of Tampa Electric Company, has been furnished by hand delivery (*) or electronic mail on this 12th day of September 2014 to the following:

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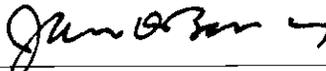
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