

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Generic investigation)
into the aggregate electric) DOCKET NO. 981890-EU
utility reserve margins planned)
for Peninsular Florida)

DUKE ENERGY NORTH AMERICA'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS
TO TAMPA ELECTRIC COMPANY

Intervenor, Duke Energy North America ("Duke"), hereby
requests Tampa Electric Company to produce the documents
requested in paragraph 1 below, pursuant to Rule 1.350, Florida
Rules of Civil Procedure, and Rule 28-106.206, Florida
Administrative Code ("F.A.C."), for inspection and copying at the
offices of Landers & Parsons, P.A., 310 West College Avenue,
Tallahassee, Florida 32301, or the offices Ausley & McMullen, 227
South Calhoun Street, Tallahassee, Florida 32301, on November 1,
1999, at 10:00 A.M. or at some other mutually agreeable time and
place.

Instructions

If you are unable to provide all of the documents requested

AFA below, please provide all of the documents that you are able to
APP produce and state the reason(s) for your inability to produce the
CAF remainder of the documents. If you object to a request for
CMU production, please provide those documents that can be supplied
CTR without objection and state the reason(s) for each objection. If
EAG
LEG
MAS
OPC
PAI
SEC
WAW
OTH

RECEIVED & FILED
FPSC-BUREAU OF RECORDS

a privilege is claimed with respect to any document that has been requested, please identify the document, the topic discussed in the document, the privilege claimed, and the basis for your claim of privilege.

Definitions

For the purposes of this request to produce, the following terms shall be defined in the manner set forth below:

A. "Document" shall mean all written or printed papers or other materials that contain or convey information, including, without limitation, all letters, reports, memoranda, laboratory data, records of telephone or other conversations, intraoffice and interoffice communications, correspondence, handwritten or typewritten notes, diaries, records of every kind, sound recordings, transcripts, contracts, agreements, books, financial statements, books of account, journals, ledgers, invoices, indices, data processing cards, other data processing materials, data sheets, computer modeling input and output files, tapes, photographs, photostats, aerial maps, bulletins, circulars, notices, messages, tabulations, economic or statistical studies, instructions, requests, calendars, desk pads, appointment books, scrapbooks, notebooks, specifications, drawings, diagrams, sketches, and writings of every kind or character, including preliminary drafts and other copies of the foregoing, however

produced or reproduced. "Document" also includes information stored by a computer, whether stored on a hard disk, "floppy" disk, CD ROM, or in any other fashion or manner.

B. "Possession, custody or control" of documents shall mean documents within the actual or constructive possession, custody or control of Tampa Electric Company.

DOCUMENTS REQUESTED

Please produce all of the following documents that are in the possession, custody or control of Tampa Electric Company.

1. Any and all Documents relied upon by Tampa Electric Company's witness, Mark Ward in the preparation of his direct testimony and rebuttal testimony filed in this docket.

LANDERS & PARSONS, P.A.



Robert Scheffel Wright
Florida Bar No. 966721
John T. LaVia, III
Florida Bar No. 853666
310 West College Avenue (ZIP 32301)
Post Office Box 271
Tallahassee, Florida 32302
Telephone (850) 681-0311
Telecopier (850) 224-5595

Counsel for Duke Energy North
America

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing filed in the referenced proceeding, has been furnished by hand delivery (*) or U.S. Mail on this 1st day of October, 1999, to the following:

Robert V. Elias, Esq.*
Division of Legal Services
Florida Public Service Comm.
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

John W. McWhirter, Jr., Esq.
McWhirter, Reeves, McGlothlin
et al.
P.O. Box 3350
Tampa, FL 33601-3350

Paul Sexton, Esq.
Thornton J. Williams, Esq.
Thornton Williams & Associates
P.O. Box 10109
Tallahassee, FL 32302

Ken Wiley
Florida Reliability
Coordinating Council
405 Reo Street, Suite 100
Tampa, FL 33609

Matthew M. Childs, Esq.
Steel Hector & Davis
215 S. Monroe Street, Ste. 601
Tallahassee, FL 32301-1804

John Roger Howe, Esq.
Office of Public Counsel
111 W. Madison Street, Rm 812
Tallahassee, FL 32399

Jeffrey A. Stone, Esq.
Beggs & Lane
P.O. Box 12950
Pensacola, FL 32756-2950

James A. McGee
Florida Power Corporation
P.O. Box 14042
St. Petersburg, FL 33733

Michelle Hershel, Esq.
Florida Electric Cooperative
Association
P.O. Box 590
Tallahassee, FL 32302

Gail Kamaras, Esq.
Debra Swim, Esq.
LEAF
1114 Thomasville Rd., Suite E
Tallahassee, FL 32303

Joseph A. McGlothlin, Esq.
Vicki Gordon Kaufman, Esq.
McWhirter, Reeves,
McGlothlin, et al.
117 S. Gadsden Street
Tallahassee, FL 32301

Jon C. Moyle, Jr., Esq.
Moyle, Flanigan, Katz, Kolins,
Raymond & Sheehan, P.A.
The Perkins House
118 North Gadsden Street
Tallahassee, FL 32301

Richard A. Zambo
598 S.W. Hidden River Avenue
Palm City, FL 34990

Kenneth A. Hoffman
Post Office Box 551
Tallahassee, FL 32302

Charles A. Russell
Florida Keys Electric
Cooperative
P.O. Box 377
Tavernier, FL 33070

Frederick M. Bryant, Esq.
Florida Municipal Power Agency
2010 Delta Boulevard
Tallahassee, FL 32315

Tracy E. Danese
Jacksonville Electric Authority
21 West Church Street, T-16
Jacksonville, FL 32202

Brent Bailey
General Counsel
Duke Energy Power Services
Post Office Box 1642
Houston, TX 77251-1642

Gary Lawrence
City of Lakeland
501 East Lemon Street
Lakeland, FL 33801

Rex Taylor
City of Vero Beach
P.O. Box 1389
Vero Beach, FL 32961

Dean Shaw
City of Ocala
P.O. Box 1270
Ocala, FL 34478

Ben Sharma
Kissimmee Utility Authority
P.O. Box 423219
Kissimmee, FL 34742

Harvey Wildschuetz
City of Lake Worth Utilities
1900 Second Avenue, North
Lake Worth, FL 33461

Lee L. Willis, Esq.*
James D. Beasley, Esq.
Ausley & McMullen
227 S. Calhoun Street
Tallahassee, FL 32301

Gary L. Sasso, Esq.
Carlton Fields
P.O. Box 2861
St. Petersburg, FL 33731

James Swartz
City of Homestead
675 N. Flagler Street
Homestead, FL 33030

Raymond O. Monasco, Jr.
Gainesville Regional Utilities
P.O. Box 147117
Station A-138
Gainesville, FL 32614

J. Paul Wetzel
City of St. Cloud
1300 Ninth Street
St. Cloud, FL 34769

Thomas W. Richards
Fort Pierce Utilities
P.O. Box 3191
Ft. Pierce, FL 34948

T. B. Tart, Esq.
Orlando Utilities Commission
P.O. Box 3193
Orlando, FL 32802

Timothy Woodbury
Seminole Electric Cooperative
P.O. Box 272000
Tampa, FL 33688

Richard G. Feldman
City of Tallahassee
300 South Adams Street
Tallahassee, FL 32301

Larry J. Thompson
Utility Board of the
City of Key West
P.O. Drawer 6100
Key West, FL 33041

Thomas J. Maida
Foley & Lardner
30 East Park Avenue
Tallahassee, FL 32301

Roy C. Young
Young, van Assenderp et al.
225 South Adams Street, #200
Tallahassee, FL 32301

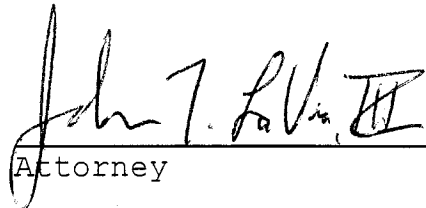
Charles Guyton
Steel Hector & Davis
215 South Monroe Street
Suite 601
Tallahassee, FL 32301-1804

Michael B. Wedner
JEA
Office of the General Counsel
117 West Duval St., Suite 480
Jacksonville, FL 32202

Myron Rollins
Black & Veatch
P.O. Box 8405
Kansas City, MO 64114

Mr. Jack English
Florida Public Utilities Co.
401 South Dixie Highway
West Palm Beach, FL 32402

Mr. Robert Williams
7201 Lake Ellinor Drive
Orlando, FL 32808



Attorney