# ORIGINAL

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August 15, 2003

#### HAND DELIVERED

Ms. Blanca S. Bayo, Director Division of Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 COMMISSION COMMISSION

Re: Petition by Cargill Fertilizer, Inc. to engage in a pilot project for self service wheeling to, from, and between points within Tampa Electric Company's service

area; FPSC Docket No. 001048-EQ

(020898-EQ)

Dear Ms. Bayo:

AUS CAF CMP

COM

CTR ECR GCL OPC

MMS SEC

OTH

Pursuant to Order No. PSC-00-1596-TRF-EQ issued in the above docket on September 6, 2000, and pursuant to discussions with the Commission Staff regarding the confidential nature of certain of the information contained in this filing, we enclose for filing two redacted copies of Tampa Electric Company's Quarterly Report identifying the costs and revenues associated with the approved experimental self-service wheeling program. The enclosed redacted Quarterly Reports is for the second quarter of 2003.

A single confidential version of the Quarterly Report is being filed under a separate cover letter. Attached hereto as Exhibit "A" is a justification for the confidential classification of the information contained in the redacted portions of this filing, which portions are highlighted in yellow on the confidential version of this Quarterly Report. That information is the "Avoided Fuel and Purchased Power Expense" for each month and each quarter as reflected under Item (9) of each quarterly report entitled "Avoided Fuel and Purchased Power Expense." As explained in Exhibit "A" additional information needs to be treated confidentially in order to prevent Tampa Electric's competitors from arithmetically backing into the "Avoided Fuel and Purchased Power Expense" using the values shown under item (11) ("Avoided Energy Cost") and the unnumbered line item, "Net Impact."

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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Thank you for your assistance in connection with this matter.

Sincerely,

James D. Beasley

JDB/pp Enclosures

cc: Angela Llewellyn (w/enc.)

## Justification for Confidential Treatment of Values Shown for "Avoided Fuel and Purchased Power Expense" <u>Under Item</u> (9) in Each Quarterly Report

Tampa Electric actively participates is the wholesale power market. In that market Tampa Electric has many competitors. Any entity competing against Tampa Electric who will make wholesale sales to third parties would derive a significant competitive advantage by knowing information reflecting on the probable price or price range Tampa Electric is willing to charge for a particular sale. Disclosing the company's avoided incremental fuel and purchased power expense would disclose to Tampa Electric's wholesale competitors valuable information regarding the cost Tampa Electric could be expected to incur in making a particular sale. Armed with this cost information, Tampa Electric's competitors can more accurately project the price at which Tampa Electric would offer to sell wholesale power. This would enable competitors to structure their own offers to undercut Tampa Electric's price and thereby secure a sale at the expense of Tampa Electric and its general body of ratepayers who benefit from such sales. In addition, disclosing Tampa Electric's avoided incremental fuel and purchased power expense would arm potential purchasers of Tampa Electric's wholesale power with valuable cost information and enable them to offer to buy power from Tampa Electric at slightly above the company's incremental fuel and purchased power cost. This would reduce the gains Tampa Electric might otherwise obtain from wholesale power sale to the ultimate detriment of Tampa Electric and its general body of ratepayers. As such, the avoided incremental fuel and purchased power expense is "information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information" and, thus, entitled to confidential treatment pursuant to Section 366.093(3)(e), Florida Statutes.

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#### Justification for Confidential Treatment of the Values Shown for "Avoided Energy Cost" Under Item (11) in Each Report and the Unnumbered Line Item "Net Impact"

The values in question are not proprietary <u>per se</u>, but can be used to arithmetically derive the highly proprietary values shown under Item (9) of each quarterly report in the line entitled "Avoided Fuel and Purchased Power Expense." As a consequence, these values need to be treated confidentially as well in order to protect against inadvertent disclosure of the "Avoided Fuel and Purchased Power Expense." This has been approved by the Commission on numerous occasions in the fuel adjustment proceeding to protect against the inadvertent disclosure of proprietary confidential business information.