

ORIGINAL

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

RECEIVED FPSC

In Re: Petition by BellSouth Telecommunications, Inc.,)
pursuant to Florida Statutes § 364.051(4) to Recover)
2005 Tropical System Related Costs and Expenses)

Docket No. 060598-TL)
06 NOV 20 PM 4:31
COMMISSION)
CLERK)
November 20, 2006

BELLSOUTH TELECOMMUNICATIONS, INC.'S MOTION FOR A
TEMPORARY PROTECTIVE ORDER

COMES NOW BellSouth Telecommunications, Inc. ("BellSouth"), and files, pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, a Motion for Temporary Protective Order ("Motion") in connection with *Revised* Response to Staff's First Request for Production of Documents No. 2.

On November 20, 2006, BellSouth filed the *Revised* Response to Staff's First Request for Production of Documents No. 2, portions of which are deemed to be confidential and proprietary by BellSouth. Some of the information that will be conveyed to and reviewed by Citizens in connection with the *Revised* Response contains proprietary, confidential business information which should not be publicly disclosed. Thus, pursuant to the Commission's Rule on confidentiality, Rule 25-22.006(5)(c), Florida Administrative Code, BellSouth moves the Prehearing Officer to issue a

CMP 1 Temporary Protective Order exempting these documents from § 119.07(1), Florida
COM _____ Statutes. The proprietary information in question includes, but is not limited to,
CTR _____ confidential business and financial information related to the following: tropical system
ECR _____
GCL 1 related expenses BellSouth experienced in 2005, specific categories of BellSouth's retail
OPC _____ line counts, hypothetical storm reserve analysis, and prior years' storm costs. Once OPC
RCA _____ notifies BellSouth that any of the proprietary documents are to be used in a proceeding
SCR _____
SGA _____ for the Commission, BellSouth will file a detailed Motion for Protective Order

SEC 1
OTH 1 *conf records*

(CONF DN 10649-06)
DOCUMENT NUMBER-DATE
10647 NOV 20 06
FPSC-COMMISSION CLERK

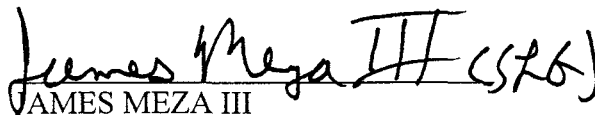
specifically addressing each of the documents identified in accordance with Rule 25-22.006, Florida Administrative Code.

Counsel for BellSouth contacted counsel for OPC on November 17, 2006 and advises that OPC does not object to the Motion but that OPC reserves the right to challenge the confidential status of any particular document.

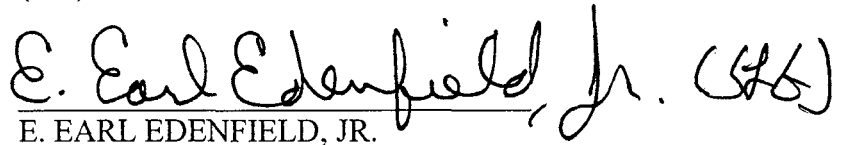
WHEREFORE, BellSouth respectfully requests the Commission to grant its Motion for Temporary Protective Order in regard to the Revised Response to Staff's First Request for Production of Documents No. 2 filed on November 20, 2006.

Respectfully submitted this 20th day of November, 2006.

BELLSOUTH TELECOMMUNICATIONS, INC.

 (5/26)

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