

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: July 27, 2021

TO: Charles W. Murphy, Senior Attorney, Office of the General Counsel

FROM: Dylan Andrews, Public Utility Analyst III, Division of Accounting & Finance

RE: Tampa Electric Company - Docket No. 20210034, 20200264 - Confidentiality Request - Document No. 07711-2021

Pursuant to Section 366.093, Florida Statutes (F.S.), and Rule 25-22.006, Florida Administrative Code, Tampa Electric Company (TECO or Company) requests confidential classification for certain highlighted information contained in responses to OPC's first request for PODs (Nos. 1-18).

The Company is claiming confidentiality for certain highlighted information appearing in Document No. 07711-2021 under Section 366.093(3), F.S. Per the referenced Statute, propriety of confidential business information includes, but is not limited to: Subsections (a) "Trade secrets," and (e) "Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information." The highlighted information provided in Document No. 07711-2021 for which confidential treatment is being sought consists of the proprietary work product of Tampa Electric's consultant, Moody's Analytics. The Company asserts that this information is in the nature of a trade secret owned by Moody's and public disclosure of this information would allow duplication of the consultant's work without compensation and would impair Moody's competitive business interests by diminishing the demand for Moody's proprietary work product.

Staff has reviewed the information provided in the highlighted portions of the Company's response to OPC's first request for PODs (Nos. 1-18) as well as the Company's confidentiality request (Document No. 07710-2021). In staff's opinion, the information that is the subject of the confidentiality request does meet the criteria for confidentiality contained in Section 366.093(3), F.S. Therefore, staff recommends that the request for confidentiality of information included in Document No. 07711-2021 be approved.