

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:** April 15, 2024

**TO:** Timothy Sparks, Senior Attorney, Office of the General Counsel  
Carlos Marquez II, Senior Attorney, Office of the General Counsel

**FROM:** Penelope D. Buys, Engineering Specialist IV, Division of Engineering *PB LK*

**RE:** Staff's recommendation on confidentiality of certain information contained in Exhibit LC-1, Document No. 3 to direct testimony of Lori L. Cifuentes and MFR Schedules C, D, E and F.

DOCKET NO.: 20240026-EI DOCUMENT NO.: 01546-2024

SOURCE: Tampa Electric Company

---

On April 2, 2024, Tampa Electric Company (TECO or Company) filed a request for confidential treatment of Document No. 01546-2024. This document contains confidential information from Exhibit LC-1, Document No. 3 to the direct testimony of Lori L. Cifuentes and MFR Schedules C, D, E, and F, contained on USB. The confidential information contained within Exhibit LC-1, Document No. 3 and MFR Schedules C-33, C-35, C-36, C-40, F-7, and F-8 relates to the proprietary work product of TECO's consultant, Moody's Analytics. The confidential information contained in MFR Schedule D-2 relates to projected capital structure components of TECO's non-regulated operations and parent company. The confidential information contained in MFR Schedules E, Volume II, Opt-Out Study relates to labor rates and calculations.

In its request for confidentiality, TECO asserts that disclosure of this information would harm both TECO and its consultant, as the information relates to bids and other contractual data, competitive interests, proprietary work product, and trade secrets. Furthermore, TECO states that the Company treats the highlighted information provided in Document No. 01546-2024 as private and has not publicly disclosed it. If disclosed it may impair the Company's ability to contract for goods and services on favorable terms and also impair the competitive business of the provider of the information.

Staff has reviewed the documents and concurs with TECO that the nature of the information meets the requirements set forth in Section 366.093(3)(a), (d), and (e), Florida Statutes, whereby disclosure of the information would impair the competitive business operations of TECO, TECO's ability to contract for goods or services, and impair the competitive business interests of TECO's retained consultant. Therefore, staff recommends the request by TECO for confidential classification of Document No. 01546-2024 be approved.

cc: Office of Commission Clerk



# 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:** April 3, 2024  
**TO:** Division of Engineering, Office of Primary Responsibility  
**FROM:** OFFICE OF COMMISSION CLERK  
**RE:** CONFIDENTIALITY OF CERTAIN INFORMATION

DOCKET NOS: 20240026-EI DOCUMENT NO: 01546-2024

DESCRIPTION: TECO (Ponder) - (CONFIDENTIAL) Highlighted information contained in Exh LC-1, Document No. 3 to direct testimony of Lori L. Cifuentes and MFR Schedules C, D, E and F, contained on USB.

SOURCE: Tampa Electric Company

---

The above confidential material was filed along with a request for confidential classification. Please complete the following form by checking all applicable information and forward it to the attorney assigned to the docket, along with a brief memorandum supporting your recommendation.

- The document(s) is (are), in fact, what the utility asserts it (them) to be.  
 The utility has provided enough details to perform a reasoned analysis of its request.  
 The material has been received incident to an inquiry.  
 The material is confidential business information because it includes:  
     (a) Trade secrets;  
     (b) Internal auditing controls and reports of internal auditors;  
     (c) Security measures, systems, or procedures;  
     (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms;  
     (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of information;  
     (f) Employee personnel information unrelated to compensation, duties, qualifications, or responsibilities;  
 The material appears to be confidential in nature and harm to the company or its ratepayers will result from public disclosure.  
 The material appears not to be confidential in nature.  
 The material is a periodic or recurring filing and each filing contains confidential information.

This response was prepared by Penelope D. Buys on April 15, 2024, a copy of which has been sent to the Office of Commission Clerk and the Office of General Counsel.