



FILED 5/6/2024  
DOCUMENT NO. 02784-2024  
FPSC - COMMISSION CLERK

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May 6, 2024

VIA HAND DELIVERY

Mr. Adam J. Teitzman  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**REDACTED**

RECEIVED-FPSC  
2024 MAY -6 PM 2:57  
COMMISSION CLERK

Re: Storm Protection Plan Cost Recovery Clause  
FPSC Docket No. 20240010-EI

Dear Mr. Teitzman:

Attached for filing in the above docket is Tampa Electric Company's Request for Confidential Classification and Request for Temporary Protective Order pertaining to portions of the company's responses to the Office of Public Counsel's First Set of Interrogatories (Nos 1-3) and First Request for Production of Documents (Nos.1-2).

Thank you for your assistance in connection with this matter.

Sincerely,

*Malcolm N. Means*

Malcolm N. Means

COM \_\_\_  
AFD \_\_\_  
APA \_\_\_  
ECO \_\_\_  
ENG \_\_\_  
GCL \_\_\_  
IDM \_\_\_  
CLK \_\_\_

1 redacted copy

MNM/ne  
Attachment

cc: All parties of record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery  
Clause

DOCKET NO. 20240010-EI

FILED: May 6, 2024

**TAMPA ELECTRIC COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
AND REQUEST FOR TEMPORARY PROTECTIVE ORDER**

Tampa Electric Company, ("Tampa Electric" or the "company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby requests confidential classification of the yellow highlighted information contained in the following described document(s) ("the Document(s)") stamped "CONFIDENTIAL" and all information that is or may be printed on yellow paper stock stamped "CONFIDENTIAL" within the Document(s), all of said confidential information being hereinafter referred to as "Confidential Information."

**Description of the Document(s)**

On this date, Tampa Electric serves its answers to the Office of Public Counsel's ("OPC") First Set of Interrogatories (Nos. 1-3) and responses to OPC's First Request for Production of Documents (Nos. 1-2) ("OPC's First Set of Discovery"). The company believes that portions of its response to OPC's First Set of Discovery, as specified on Exhibit "A," constitute Confidential Information and has designated it as such by highlighting. Contemporaneous with the filing of this request, Tampa Electric submitted the Confidential Information to the Commission Clerk under a separate, confidential cover letter. Tampa Electric requests confidential classification for this information such that it will be entitled to protection against public disclosure pursuant to Section 366.093, Florida Statutes. In support of this request, the company states:

1. Subsection 366.093(1), Florida Statutes, provides that any records "found by the Commission to be proprietary confidential business information shall be kept confidential and

shall be exempt from s. 119.07(1), Florida Statutes [requiring disclosure under the Public Records Act].” Proprietary confidential business information includes but is not limited to: (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 the information; and (f) employee personnel information unrelated to compensation, duties, qualifications, or responsibilities. §366.093(3)(a)-(f), Fla. Stat. The Confidential Information that is the subject of this request and motion falls within one or more of these statutory categories and, thus, constitutes proprietary confidential business information entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

2. Attached hereto as Exhibit "A" is a justification for confidential treatment of the Confidential Information contained in the Documents.

3. Exhibit "B" contains the public versions of the Documents with the Confidential Information.

4. The Confidential Information contained in the Documents is intended to be and is treated by Tampa Electric as private and has not been publicly disclosed.

5. For the same reasons set forth herein in support of its request for confidential classification, Tampa Electric also moves the Commission for entry of a Temporary Protective Order pursuant to Rule 25-22.006(6)(a) of the Florida Administrative Code.

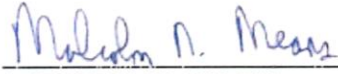
**Requested Duration of Confidential Classification**

6. Pursuant to Rule 25-22.006(9)(a), Tampa Electric requests that the Confidential Information be treated by the Commission as confidential proprietary business information for 18 months. If, and to the extent that the company is in need of confidential classification of the Confidential Information beyond the 18-month period set forth in the Commission rule, the justification and grounds for such extended confidential treatment are set forth in Exhibit "C" to this request and motion.

WHEREFORE, Tampa Electric respectfully requests that the Confidential Information that is the subject of this request and motion be accorded confidential classification for the reasons set forth herein and for 18 months.

DATED this 6th day of May, 2024.

Respectfully submitted,



J. JEFFRY WAHLEN

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(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that electronic copies of the foregoing request have been served by electronic mail on this 6<sup>th</sup> day of May, 2024 to the following:

Daniel Dose  
Jennifer Crawford  
Shaw Stiller  
Office of General Counsel  
Florida Public Service Commission  
Room 390L – Gerald L. Gunter Building  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[ddose@psc.state.fl.us](mailto:ddose@psc.state.fl.us)  
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*Malcolm N. Means*

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- ATTORNEY

**EXHIBIT A**  
**JUSTIFICATION FOR CONFIDENTIAL TREATMENT**

<b>First Request for Production of Documents (Nos. 1-2)</b>			
<b>Bates Page Nos.</b>	<b>Document Description</b>	<b>Description of Information</b>	<b>Justification</b>
2-3	Invoice Responsive to OPC POD 1	The Highlighted Information.	(1) & (2)

**Justifications**

- (1) The highlighted information consists of labor rates, calculations, and bank information. This constitutes “[i]nformation concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility to contract for goods or services on favorable terms” under Section 366.093(3)(d), Florida Statutes.
- (2) The highlighted information relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. This information is protected by Section 366.093(3)(e), Florida Statutes.



**EXHIBIT B**  
**PUBLIC VERSION(S) OF THE DOCUMENT(S)**

Attached hereto (unless previously filed as may be noted below) are two public versions of the Document(s) with the Confidential Information redacted.

Public Version(s) of the Document(s) attached

\_\_\_\_\_

Public Version(s) of the Document(s) attached

  X

**EXHIBIT C**  
**JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD**

N/A

REDACTED

TAMPA ELECTRIC COMPANY  
DOCKET NO. 20240010-EI  
OPC'S FIRST REQUEST FOR PODS  
MAY 6, 2024


Page 1



CREATE AMAZING.

December 21, 2023

Invoice: 162728-1Rev  
Federal ID: 43-0956142  
Client Agreement: 20-00192  
Client Work Order: 2

TAMPA ELECTRIC CO ACCOUNTS PAYABLE 702 N FRANKLIN ST TAMPA FL 33602	<b>SEND PAYMENT TO:</b>  Burns & McDonnell Engineering Co., Inc. PO Box 411883 Kansas City, MO 64141-1883  Reference Invoice Number with Payment  TERMS: NET 30 DAYS	<b>WIRE INSTRUCTIONS:</b>  
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Professional Services for Storm Protection Plan 2025

SERVICE THROUGH: 30-Nov-2023

Item No	Description	Amount	% Completed	Total Completed	Previous Invoice	Current Invoice	Less Retainage	Net Amount
1	Core Updates & Reporting	██████████	100.00	██████████	0.00	██████████	0.00	██████████
2	Model Enhancements	██████████	0.00	0.00	0.00	0.00	0.00	0.00
3	Initial SPP3 Plan Development	██████████	0.00	0.00	0.00	0.00	0.00	0.00
4	AssetLens (Labor)	██████████	0.00	0.00	0.00	0.00	0.00	0.00
5	Incorporate Engineering Feedback	██████████	0.00	0.00	0.00	0.00	0.00	0.00
6	Finalize Plan and Prepare Filing Deliverables	██████████	0.00	0.00	0.00	0.00	0.00	0.00
<b>TOTAL</b>		██████████		██████████	0.00	██████████	0.00	██████████

**EXPENSE**

(See Attached)

Subtotal TECO 2025 SPP ██████████

**TOTAL AMOUNT DUE THIS INVOICE** ██████████ **USD**

apinvoice@tecoenergy.com

**Thank you for your business. We appreciate the opportunity to serve you.**

Project Manager: Arlin Mire +1 (737) 787-6684 arlin.mire@1898andco.com  
Invoice Inquiry: Jose Vargas jvargas@burnsmcd.com

Invoice 162728-1Rev

Travel Expense				
Name	Expenditure Type	Cost	Markup/ Markdown	Billed Amount
Boyle, Carter	AIRLINE			
Boyle, Carter	LODGING			
Boyle, Carter	MEALS - TRAVEL			
Boyle, Carter	PARKING/TOLLS			
Boyle, Carter	PERSONAL MILEAGE			
Feuerborn, Scott	GROUND TRANSPORTATION			
Feuerborn, Scott	MEALS - TRAVEL			
Given, Braeden	AIRLINE			
Given, Braeden	GROUND TRANSPORTATION			
Given, Braeden	PARKING/TOLLS			
Given, Braeden	MEALS - TRAVEL			
Given, Braeden	LODGING			
Mire, Arlin	AIRLINE			
Mire, Arlin	GROUND TRANSPORTATION			
Mire, Arlin	PARKING/TOLLS			
Mire, Arlin	MEALS - TRAVEL			
Mire, Arlin	LODGING			
Mire, Arlin	PERSONAL MILEAGE			
Travel Expense Total				

Other Expense				
	Expenditure Type	Cost	Markup/ Markdown	Billed Amount
	COMPUTER EQUIPMENT/SUPPLIES			
Other Expense Total				

Expense Subtotal: TECO 2025 SPP				
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