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May 28, 2024

VIA HAND DELIVERY

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COMMISSION CLERK

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

REDACTED

In re: Petition for Rate Increase by Tampa Electric Company

DOCKET NO. 20240026-EI

In re: Petition for approval of 2023 Depreciation and Dismantlement Study, by Tampa Electric Company

DOCKET NO. 20230139-EI

In re: Petition to implement 2024 Generation Base Rate Adjustment provisions in Paragraph 4 of the 2021 Stipulation and Settlement Agreement, by Tampa Electric Company


DOCKET NO. 20230090-EI

Dear Mr. Teitzman:

Attached for filing in the above docket is Tampa Electric Company's Request for Confidential Classification of certain information contained in Exhibit No. 1 to the deposition transcript of Jeff Chronister Also attached is the public (redacted) version of the document.

Thank you for your assistance in connection with this matter.

Sincerely,


Virginia Ponder

VLP/ne
Attachment

cc: All parties of record

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- CLK _____

I redacted copy

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase by Tampa Electric Company

DOCKET NO. 20240026-EI

In re: Petition for approval of 2023 Depreciation and Dismantlement Study, by Tampa Electric Company

DOCKET NO. 20230139-EI

In re: Petition to implement 2024 Generation Base Rate Adjustment provisions in Paragraph 4 of the 2021 Stipulation and Settlement Agreement, by Tampa Electric Company

DOCKET NO. 20230090-EI

FILED: May 28, 2024

**TAMPA ELECTRIC COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

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 May 14, 2024, Tampa Electric filed a Notice of Intent to Request Confidential Classification and a Motion for Temporary Protective Order for certain of the questions, answers, and exhibits contained in the transcript of the deposition of Jeff Chronister ("Transcript").¹ The company has completed its review of the text of the Transcript and has determined that the only confidential material is found within Exhibit No. 1 to the Transcript.

¹ See DN 03016-2024 and DN 03020-2024 filed on May 14, 2024, in Docket No. 20240026-EI.

The company believes that portions of Exhibit No. 1 to the Transcript of the Deposition of Jeff Chronister, as specified on Exhibit "A" of this Request for Confidential Classification, constitutes Confidential Information and has designated it as such by highlighting. Contemporaneous with the filing of this request, Tampa Electric submitted Exhibit No. 1 with the Confidential Information highlighted 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 (Exhibit No. 1) with the Confidential Information redacted.

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.

Requested Duration of Confidential Classification

5. 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 28th day of May, 2024.

Respectfully submitted,



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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 28th day of May, 2024 to the following:

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ATTORNEY

EXHIBIT A
JUSTIFICATION FOR CONFIDENTIAL TREATMENT

Exhibit No. 1 to the Transcript of the Deposition of Jeff Chronister		
Document	Description of Information	Justification
Exhibit No. 1 to the Transcript of the Deposition of Jeff Chronister	The Highlighted Information.	(1)

Justifications

(1) The highlighted information is cost profile information about unregulated affiliates that their competitors are not required to disclose publicly, and therefore relates to competitive interests of unregulated affiliates, the disclosure of which would impair the competitive business of those entities. 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 X

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

Source POD 2-37 Excel spreadsheets

	A	B	C	D	E	F	G
		2023	2022	2021	2023	2022	2021
Emera & Affiliates	Amount	Amount	Amount	Percent	Percent	Percent	
1 Emera Allocated Below							
2 Nova Scotia Power	\$ 9,281,239	\$ 8,970,310	\$ 8,620,688	34%	35%	34%	
3 Emera Holdo				18%	19%	20%	
4 TECO	\$ 4,132,878	\$ 2,995,235	\$ 2,751,316	15%	12%	11%	
5 Emera Energy Trading				10%	11%	10%	
6 PGS	\$ 1,334,044	\$ 889,961	\$ 597,285	5%	4%	2%	
7 NMG	\$ 1,067,629	\$ 886,629	\$ 913,344	4%	3%	4%	
8 TSI	\$ 1,158,626	\$ 1,757,751	\$ 2,074,586	4%	7%	8%	
9 Barbados P&L	\$ 708,164	\$ 850,685	\$ 904,458	3%	3%	4%	
10 Grand Bahamas	\$ 409,542	\$ 247,350	\$ 639,224	2%	1%	2%	
11 Subtotal Above Affiliates	\$ 25,789,737	\$ 24,041,201	\$ 24,203,273	95%	95%	94%	
12 Other Affiliates	\$ 1,346,767	\$ 1,345,392	\$ 1,446,152	5%	5%	6%	
13 Total Allocated				100%	100%	100%	

Chronister
 Exhibit 2
 Date: 5/8/24
 J. Babcock

EXHIBIT C
JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD

N/A