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May 30, 2024

**VIA HAND DELIVERY**

**REDACTED**

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

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

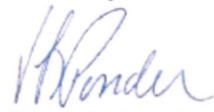
DOCKET NO. 20230090-EI

Dear Mr. Teitzman:

Attached for filing in the above docket is Tampa Electric Company's Request for Confidential Classification and Request for Temporary Protective Order of certain information contained in its answers to Federal Executive Agencies' First Request for Production of Documents (Nos. 1-15). 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

RECEIVED-FPSC  
2024 MAY 30 PM 1:54  
COMMISSION  
CLERK

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 30, 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 Federal Executive Agencies' ("FEA") First Request for Production of Documents (Nos. 1-15) ("FEA's Request"). The company believes that portions of its responses to FEA's Request, 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 30<sup>th</sup> 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 response have been served by electronic mail on this 30<sup>th</sup> day of May, 2024 to the following:

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Timothy Sparks  
Daniel Dose  
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ATTORNEY

**EXHIBIT A  
JUSTIFICATION FOR CONFIDENTIAL TREATMENT**

<b>Federal Executive Agencies' First Request for Production of Documents (Nos. 1-15)</b>			
<b>Bates Page Nos.</b>	<b>Document Description</b>	<b>Description of Information</b>	<b>Justification</b>
31410	Attachment to correspondence between Gannett Fleming and TECO as it pertains to the 2023 Depreciation Study filed as Exhibit NA-1, Document No. 2, provided in Tampa Electric's Response to Federal Executive Agencies' Request for Production No. 13.	The Highlighted Information	(1) & (2)

**Justifications**

- (1) 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.
- (2) The highlighted information consists of labor rates. 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.

**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



GANNETT FLEMING VALUATION AND RATE CONSULTANTS, LLC

2024 BILLING RATES

<u>Personnel</u>	<u>Hourly Rate</u>
<b>SUPERVISORY STAFF</b>	
John J. Spanos, President	
Ned W. Allis, Vice President	
Harold Walker, III, Manager, Financial Studies	
Bryan P. Berry, Vice President, Energy	
Constance E. Heppenstall, Senior Project Manager, Rate Studies	
John F. Wiedmayer, Jr., Senior Project Manager, Depreciation Studies	
<b>STAFF</b>	
Assistant Project Manager, Depreciation Studies	
Assistant Project Manager, Rate Studies	
Senior Analysts	
Analysts	
Associate Analysts	
Assistant Analysts III	
Assistant Analysts II	
Assistant Analysts I	
Senior Technicians	
Support Staff	

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

N/A