



August 21, 2024

VIA ELECTRONIC FILING

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 of portions of the July 26, 2024, deposition transcript of Archie Collins containing the public (redacted) version of these documents.

Thank you for your assistance in connection with this matter.

Sincerely,

Virginia Ponder

VLP/ne
Attachment

cc: All parties of record

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: August 21, 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 July 26, 2024, the Office of Public Counsel ("OPC") conducted a deposition of company witness Archie Collins. During the deposition, there was discussion related to confidential discovery responses produced to OPC in this docket. On July 29, 2024, Tampa Electric filed a motion for temporary protective order pertaining to the July 26, 2024, deposition transcript of Archie Collins ("Transcript").¹

¹ See DN 07983-2024 filed on July 29, 2024, in Docket No. 20240026-EI.

The company has conducted a confidentiality review and identified certain information within the Transcript, as specified on Exhibit "A," that constitutes 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), Florida Statutes. The Confidential Information that is the subject of this request 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.

Requested Duration of Confidential Classification

5. Pursuant to Rule 25-22.006(9)(a), Florida Administrative Code, 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.

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

DATED this 21st day of August, 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 21st day of August, 2024 to the following:

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ATTORNEY

EXHIBIT A
JUSTIFICATION FOR CONFIDENTIAL TREATMENT

July 26, 2024, Deposition Transcript of Archie Collins			
Location of Information	Document Description	Description of Information	Justification(s)
Page 181, Line 11.	July 26, 2024, Deposition Transcript of Archie Collins	The Highlighted Information	(1)

JUSTIFICATION(S)

(1) The highlighted information relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. Tampa Electric is not privy to the detailed information presented to and considered by the board of directors of other investor owned utilities; therefore, disclosure of the detailed information presented to and considered by the TECO Energy board of directors would put the company at a competitive disadvantage. 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

1 A. It does use that term.

2 Q. That's also a term in quotation marks.

3 A. And I don't know why that is.

4 Q. Okay. And for purposes of this page, is the
5 term "energy poverty" being defined as it's suggested in
6 the first bullet as when 6 percent or more of income is
7 spent on the household energy bill?

8 A. That's what it appears to indicate, you know,
9 and there's a footnote there, but yes.

10 Q. And this page acknowledges that approximately
11 [REDACTED] of a community in Hillsborough County is
12 likely experiencing energy poverty; is that right?

13 A. So it's suggesting that that's a possibility,
14 yes. You know, you can -- we hadn't really done any
15 research on this. It was really again trying to make
16 the point, the team to the board, that the escalation of
17 rates that we had experienced in 2023 was causing some
18 hardship. And while we are not economists, we don't
19 really know exactly how to interpret this. We were
20 simply trying to facilitate a conversation with the
21 board.

22 Q. Do you remember what the outcome of that
23 conversation was?

24 A. Yes.

25 Q. And what was it?

EXHIBIT C
JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD

N/A