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November 20, 2024

VIA HAND DELIVERY

REDACTED

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

Re: Staff's Audit Workpapers (Control No.: 2024-031-1-1)
Environmental Cost Recovery Clause
FPSC Docket No. 20240007-EI

Dear Mr. Teitzman:

Attached for filing in the above docket is Tampa Electric Company's Amended (Control No. Ref. 2024-031-1-1) Request for Confidential Classification of certain information contained in its responses to Staff's Confidential Audit Workpapers to be retained here: 2024-031-1-1 (Document No. 08870-2024).

Also attached is an accompanying USB containing the public (redacted) version of these documents.

Thank you for your assistance in connection with this matter.

Sincerely,

Malcolm N. Means

MNM/bml
Attachment

cc: All parties of record

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COMMISSION
CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost Recovery Clause

DOCKET NO. 20240007-EI

FILED: November 20, 2024

**TAMPA ELECTRIC COMPANY'S AMENDED
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 August 30, 2024, Commission Staff filed their final audit report for Tampa Electric in the above-captioned docket. *See* DN 08781-2024. On September 5, 2024, Commission Staff informed Tampa Electric that it was retaining certain confidential audit work papers. Pursuant to Rule 25-22.006(3)(a)2, Florida Administrative Code, a utility must file a request for confidential classification covering confidential workpapers within 21 days after the date the audit exit conference would have taken place, or in this case on September 5, 2024, unless the utility shows good cause. Due to inadvertence, the company hereby files this Request for Confidential Classification after the September 26th deadline because it believes that portions of the Workpapers, as specified on Exhibit "A" of this Request, 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 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.

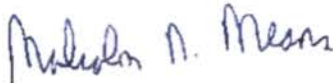
Requested Duration of Confidential Classification

5. Pursuant to Rule 25-22.006(9)(a), 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 Company 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 20th day of November 2024.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request, filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 20th day of November 2024 to the following:

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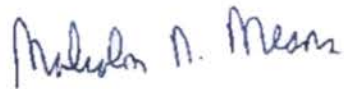
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ATTORNEY

**EXHIBIT A
JUSTIFICATION FOR CONFIDENTIAL TREATMENT**

Tampa Electric Company Staff Audit Workpapers			
Bates Page Nos.	Document Description	Description of Information	Justification
3-15	Cogen Billing & lists of Cogen purchases	The Highlighted Information	(1) & (2)

Justifications

(1) The highlighted information consists of customer names and 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.

(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 via USB X

EXHIBIT C
JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD

N/A