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April 13, 1998

HAND DELIVERED

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Fuel and Purchased Power Cost Recovery Clause
and Generating Performance Incentive Factor
FPSC Docket No. 980001-EI

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and ten (10) copies of Tampa Electric Company's Supplement to Request for Specified Confidential Treatment of portions of Forms 423-1(a) and 423-2(b) for the month of January 1998.

Please acknowledge receipt and filing of the above by stamping ✓ the duplicate copy of this letter and returning same to this writer.

- ACK ✓
- MFA
- APP 1
- CAF
- CMU
- CTR
- EAG
- LEG
- LIN 3 JDB/pp Enclosures
- QPC
- RCH
- SEC 1
- WAS
- OTH

Thank you for your assistance in connection with this matter.

Sincerely,


James D. Beasley

cc: All Parties of Record (w/enc.)

RECEIVED & FILED

FPSC BUREAU OF RECORDS

04193

ORIGINAL

In re: Fuel and Purchased Power)	
Cost Recovery Clause and)	DOCKET NO. 980001-EI
Generating Performance Incentive)	FILED: April 13, 1998
Factor.)	
)	

**TAMPA ELECTRIC COMPANY'S SUPPLEMENT TO
REQUEST FOR SPECIFIED CONFIDENTIAL TREATMENT**

Pursuant to §366.093, Fla. Stat., Tampa Electric Company ("Tampa Electric" or "the company") submits the following Supplement to its Request for Specified Confidential Treatment of the company's Forms 423-1(a), 423-2, 423-2(a) and 423-2(b) for the month of January 1998:

1. Tampa Electric's original request for confidential treatment of the above-referenced forms for January 1998 was filed March 16, 1998. The first page of Exhibit "A" attached to that filing set forth the justification for confidential treatment of highlighted information in the confidential version of FPSC Form 423-1(a), page 1 of 2. Attached hereto as page 1.5 of Exhibit "A" is the company's supplemental justification for confidential treatment of page 2 of 2 of FPSC Form 423-1(a).

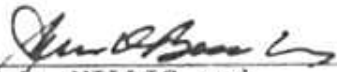
2. In addition, on FPSC Form 423-2(b) (Electro-Coal Transfer Facility - Gannon Station (1)), the line references on the original filing indicate "1 - 4" when they should have been "1 - 5." Attached is a revised version of page 10 of Exhibit "A" correcting these line references.

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06193 00138

WHEREFORE, Tampa Electric submits the foregoing supplemental information in support of its request for confidential treatment of its Forms 423 filing for the month of January 1998.

DATED this 13th day of April, 1998.

Respectfully submitted,



LEE L. WILLIS and
JAMES D. BEASLEY
Ausley & McMullen
Post Office Box 391
Tallahassee, Florida 32302
(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Supplemental Request for Specified Confidential Treatment, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail on this 13th day of March, 1998 to the following individuals:

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ATTORNEY

TAMPA ELECTRIC COMPANY

Docket No. 980001-EI
April 13, 1998

**Justification for Confidentiality of January, 1998 Report:
Tampa Electric Company**

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-1(a) (Page 2 of 2)	1 - 8	H	(1)
423-1(a) (Page 2 of 2)	1 - 8	I	(2)
423-1(a) (Page 2 of 2)	1 - 8	J	(2)
423-1(a) (Page 2 of 2)	1 - 8	K	(2)
423-1(a) (Page 2 of 2)	1 - 8	L	(2)
423-1(a) (Page 2 of 2)	1 - 8	M	(2), (3)
423-1(a) (Page 2 of 2)	1 - 8	N	(2), (4)
423-1(a) (Page 2 of 2)	1 - 8	O	(2)

Rationale for Confidentiality:

- (1) This information is contractual information which, if made public, "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. The information shows the price which Tampa Electric has paid for No. 2 fuel oil per barrel for specific shipments from specific suppliers. This information would allow suppliers to compare an individual supplier's price with the market "for that date of delivery" and thereby determine the contract pricing formula between Tampa Electric and that supplier.

Disclosure of the invoice price would allow suppliers to determine the contract price formula of their competitors. The knowledge of each other's prices would give suppliers information with which to actually control the pricing in No. 2 oil by either all quoting a particular price or adhering to a price offered by a major supplier. This could reduce or eliminate any opportunity for a major buyer, like Tampa Electric, to use its market presence to gain price concessions from any individual supplier. The end result is reasonably likely to be increased No. 2 fuel oil prices and, therefore, increased electric rates.

- (2) The contract data found in Columns I through O are algebraic functions of Column H. Thus, the publication of these columns together, or independently, could allow a supplier to derive the invoice price of No. 2 oil paid by Tampa Electric.
- (3) For fuel that does not meet contract requirements, Tampa Electric may reject the shipment, or accept the shipment and apply a quality adjustment. This is, in effect, a pricing term which is as important as the price itself and is therefore confidential for the reasons stated in paragraph (1) relative to price concessions.
- (4) This column is as important as H from a confidentiality standpoint because of the relatively few times that there are quality or discount adjustments. That is, Column N will equal Column H most of the time. Consequently, it needs to be protected for the same reason as set forth in paragraph (1).

**Justification for Confidentiality of January, 1998 Report:
Electro-Coal Transfer Facility - Gannon Station (1)**

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(b)	1 - 5	G	(1)
423-2(b)	1 - 5	I	(2)
423-2(b)	1 - 5	K	(3)
423-2(b)	1 - 5	L	(3)
423-2(b)	1 - 5	M	(3)
423-2(b)	1 - 5	N	(3)
423-2(b)	1 - 5	O	(3)
423-2(b)	1 - 5	P	(3)

Rationale for Confidentiality:

- (1) Disclosure of the effective purchase price in Column G "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Disclosure of the original invoice price per ton would enable a competitor to "back into" the segmented transportation cost using the publicly disclosed delivered price for coal at the Electro-Coal Transfer Facility. This would be done by subtracting the original invoice price per ton from the price per ton delivered at Electro-Coal, thereby revealing the river barge rate. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Electro-Coal Transfer Facility - Big Bend Station).
- (2) Disclosure of the rail rate per ton would adversely affect the ability of Tampa Electric and its affiliates to negotiate favorable rail rates with the various railroads serving areas in the vicinity of the river terminals used by Tampa Electric's affiliate, Gatliff Coal Company. This coal is shipped from different terminals which affords Gatliff some leverage in negotiating with the railroads. Disclosure of the rail rates paid would effectively eliminate this leverage and lead to higher rail rates. This would work to the ultimate detriment of Tampa Electric and its Customers. Accordingly, disclosure of this information "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat.