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RECORDS AND  
REPORTING

November 17, 2000

HAND DELIVERED

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

Re: Petition of Tampa Electric Company for Approval of a Special Contract with IMC Phosphates Company for the Provision of Interruptible Electric Service; FPSC Docket No. 001287-EI

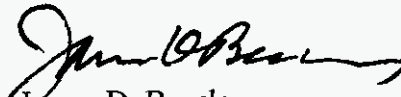
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Request for Confidential Classification and Protective Order.

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


Thank you for your assistance in connection with this matter.

Sincerely,

  
James D. Beasley

JDB/pp  
Enclosures

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

RECEIVED & FILED  
  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

~~14910~~ NOV 17 8

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Tampa Electric Company )  
For Approval of a Special Contract With )  
IMC Phosphates Company For The Provision )  
Of Interruptible Electric Service )  
\_\_\_\_\_ )

DOCKET NO. 001287-EI

FILED: November 17, 2000

**TAMPA ELECTRIC COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION AND PROTECTIVE ORDER**

Pursuant to Section 366.093, Florida Statutes and Rule 25-22.006, Florida Administrative Code, Tampa Electric Company ("Tampa Electric" or "the Company") respectfully requests that the Commission treat as confidential information and exempt from public disclosure certain confidential proprietary business information contained in the Company's responses to Staff's Second Set of Interrogatories (No. 24) in this docket and that the Commission issue an order protecting such information. In support thereof, the Company says:

1. Section 366.093, Florida Statutes, at subsection (3)(e), specifically states that proprietary, confidential business information includes:

*"(e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information."*

2. Tampa Electric is this date filing, under separate cover, its response to Staff's Second Set of Interrogatories in this proceeding. Tampa Electric's response to Interrogatory No. 24 contains information that is commercially sensitive and proprietary to IMC Phosphates Company ("IMC") and/or Tampa Electric. A detailed justification for the requested confidential treatment of the information in question is set forth below.

DOCUMENT NUMBER-DATE

14910 NOV 17 8

FPSC-RECORDS/REPORTING

3. The highlighted portions of the response to Interrogatory No. 24, including the workpapers printed on yellow paper that provide the detail underlying the three scenarios examined, contain information on the IMC's electric service billing and usage. Information on the Customer's load and electric expense can be used to extrapolate other proprietary information concerning the Customer's business operations, all of which could be used by the Customer's competitors to the Customer's disadvantage.

4. In addition, the highlighted portions of the response disclose negotiated rates, billing determinants, projected fuel costs and incremental costs that are proprietary in nature. The negotiated rate and billing determinant information could be used to IMC's disadvantage by its competitors. Public disclosure of the Tampa Electric fuel cost projections and incremental cost would seriously undermine the Company's ability to acquire wholesale power supplies at reasonable prices.

5. The material for which confidential classification is sought is intended to be and is treated by Tampa Electric and IMC as private and has not been disclosed.

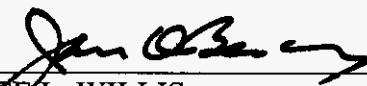
WHEREFORE, Tampa Electric respectfully requests that the Commission grant the Company's request for confidential classification of the highlighted portions of the above-mentioned interrogatory responses and that the Commission issue an order protecting such information from discovery.

DATED this 17<sup>th</sup> day of November 2000

Respectfully Submitted

HARRY W. LONG, JR.  
Assistant General Counsel  
Tampa Electric Company  
Post Office Box 111  
Tampa, Florida 33601  
(813) 228-1702

and

  
\_\_\_\_\_  
LEE L. WILLIS  
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 Request for Confidential Classification and Protective Order, filed on behalf of Tampa Electric Company, has been served by hand delivery (\*) on this 17<sup>th</sup> day of November 2000 to the following:

Ms. Deborah D. Hart\*  
Staff Counsel  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

  
\_\_\_\_\_  
ATTORNEY