## RUTLEDGE, ECENIA, PURNELL & HOFFMAN

PROFESSIONAL ASSOCIATION ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA JOHN R. ELLIS KENNETH A. HOFFMAN THOMAS W. KONRAD MICHAEL G. MAIDA MARTIN P. McDONNELL

POST OFFICE BOX 551, 32302-0551 215 SOUTH MONROE STREET, SUITE 420 TALLAHASSEE, FLORIDA 32301-1841

TELEPHONE (850) 681-6788

TELECOPIER (850) 681-6515

J. STEPHEN MENTON R. DAVID PRESCOTT HAROLD E.X. PURNELL GARY R. RUTLEDGE

**GOVERNMENTAL CONSULTANTS** MARGARET A. MENDUNI M. LANE STEPHENS

ORIGINAL

January 22, 2001

Ms. Blanca S. Bayo, Director Division of Records and Reporting Florida Public Service Commission 2540 Shumard Oak Boulevard Betty Easley Conference Center, Room 110 Tallahassee, FL 32399-0850

Re:

Docket No.000061-EI

Dear Ms. Bayo:

Enclosed herewith for filing in the above-referenced docket on behalf of Allied Universal Corporation and Chemical Formulators, Inc. ("Allied/CFI") are:

1. The original and fifteen copies of Allied/CFI's Notice of Intent to Request Confidential Classification;

00923-01

The original and one highlighted copy of the Prefiled Rebuttal Testimony of Robert M. Namoff in an envelope marked "confidential;"

00924-01 Fifteen redacted copies of the Prefiled Rebuttal Testimony of Robert M. Namoff; 3. 00925-01

The original and one highlighted copy of the Prefiled Rebuttal Testimony of Dr. 4. Charles F. Phillips, Jr. in an envelope marked "confidential;"

00926-01

Fifteen redacted copies of the Prefiled Rebuttal Testimony of Dr. Charles F. 5.

Phillips, Jr.;

00927-01

The original and one highlighted copy of the Prefiled Rebuttal Testimony of 6. James W. Palmer in an envelope marked "confidential;"

O の タスピーの / Fifteen redacted copies of the Prefiled Rebuttal Testimony of James W. Palmer; 7.

00929-01

DATE DOCUMENT NO.

1/22/01 00923-01 FPSC - COMMISSION CLERK



## RUTLEDGE, ECENIA, PURNELL & HOFFMAN

8. The original and one highlighted copy of the Prefiled Rebuttal Testimony of Peter DeAngelis in an envelope marked "confidential;" and

© 0930-0/ Fifteen redacted copies of the Prefiled Rebuttal Testimony of Peter DeAngelis. 9.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the copy to me.

Thank you for your assistance with this filing.

Sincerely,

John R. Ellis

John R E MS

JRE/vp Enclosures

All counsel cc:

### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Allied Universal	)	"TIG/NAL
Corporation and Chemical Formulators,	)	. 4747
Inc. against Tampa Electric Company	)	
for violation of Sections 366.03,	)	Docket No. 000061-EI
366.06(2) and 366.07, Florida Statutes,	)	
with respect to rates offered under	)	
Commercial/Industrial Service Rider tariff;	)	
petition to examine and inspect confidential	)	Filed: January 22, 2001
information; and request for expedited	)	
relief.	)	
	_)	

DO:

# ALLIED/CFI'S NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

Allied Universal Corporation ("Allied") and it affiliate, Chemical Formulators, Inc. ("CFI") (collectively "Allied/CFI"), by and through their undersigned counsel and pursuant to Rule 25-22.006(3)(a), Florida Administrative Code, file this Notice of Intent to Request Confidential Classification, and state as follows:

- 1. Concurrently with this Notice, Allied/CFI is filing the prefiled rebuttal testimony of Dr. Charles F. Phillips, Jr., Robert M. Namoff, James W. Palmer and Peter De Angelis.
- 2. The rebuttal testimony of Dr. Phillips and Confidential Exhibits CFP-2 through CFP-3 to his testimony contain proprietary confidential business information.
- 3. The rebuttal testimony of Mr. Namoff and Confidential Exhibits RMN-15 through RMN-\_ to his testimony contain proprietary confidential business information.
- 4. The rebuttal testimony of Mr. Palmer contains proprietary confidential business information.

This docketed notice of intent was filed with  Confidential Document No The	
learment has been placed in confuential storage	DOCUMENT NUMBER-DATE
pending timely receipt of a request for	00923 JAN 22 5
	/ FPSC-RECORDS/REPORTING

- 5. The rebuttal testimony of Mr. De Angelis contains proprietary confidential business information.
- 6. Allied/CFI is filing the original and one copy of the prefiled rebuttal testimony of each witness in an envelope marked "Confidential" with the confidential portions of the testimony highlighted in the copy and any confidential exhibits included. Allied/CFI has also filed fifteen edited copies of each witness' prefiled rebuttal testimony with the confidential information in the testimony and any confidential exhibits redacted.
- 7. The information for which confidential classification will be requested is intended to be and is treated by Allied/CFI as private and has not been publicly disclosed.
- 8. The original of this Notice is being filed with the Division of Records and Reporting and a copy is being served on all counsel of record.

Respectfully submitted,

Kenneth A. Hoffman, Esq.

John R. Ellis, Esq.

Rutledge, Ecenia, Purnell & Hoffman, P.A.

P. O. Box 551

Tallahassee, FL 32302

(850) 681-6788 (Telephone)

(850) 681-6515 (Telecopier)

Daniel K. Bandklayder, Esq.
Anania, Bandklayder, Blackwell,
Baumgarten & Torricella
Bank of America Tower, Suite 4300
100 Southeast Second Street
Miami, FL 33131-2144
(305) 373-4900 (Telephone)
(305) 373-6914 (Telecopier)

Philip A. Allen, III, Esq.
One Biscayne Tower, Suite 1616
2 South Biscayne Boulevard
Miami, FL 33131
(786) 425-2960 (Telephone)
(786) 425-2967 (Telecopier)

Attorneys for Allied Universal Corporation and Chemical Formulators, Inc.

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Allied/CFI's Notice of Intent to Request Specified Confidential Classification was furnished as indicated to the following this 22nd day of January, 2001.

Robert V. Elias, Esq.(\*)
Marlene Stern, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard, Room 370
Tallahassee, Florida 32399-0850

Via Hand Delivery

Lee L. Willis, Esq.(\*)
James D. Beasley, Esq.
Ausley & McMullen
227 South Calhoun Street
Tallahassee, Florida 32301

Via Hand Delivery

Harry W. Long, Jr., Esq. TECO Energy, Inc. Legal Department P. O. Box 111 Tampa, FL 33601

Via U.S.Mail

Patrick K. Wiggins, Esq. Wiggins & Villacorta P. O. Box 1657
Tallahassee, FL 32302

Via U.S. Mail

Wayne L. Schiefelbein, Esq. P. O. Box 15856 Tallahassee, FL 32317-5856 Via Hand Delivery

Scott J. Fuerst, Esq. Ruden, McClosky, et al. 200 East Broward Blvd. Ft. Lauderdale, FL 33301 Via U.S. Mail

Allied/intent2