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

February 19, 2001

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

GOVERNMENTAL CONSULTANTS
MARGARET A. MENDUNI
M LANE STEPHENS

By Hand Delivery

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 for filing on behalf of Allied/CFI are the original and fifteen copies of Allied/CFI's Notice of Filing Supplemental Confidential Exhibit to Rebuttal Testimony and Notice Of Intent to Request Confidential Classification.

Please acknowledge this filing by date 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

JRE/sy Enclosures

cc: Parties of Record

This docketed notice of intent was filed with Confidential Document No. (2257-0). The document has been placed in confidential storage pending timely receipt of a request for confidentiality.

DOCUMENT NUMBER - DATE

02256 FEB 19 a

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

relief.)	
, 1)	
information; and request for expedited)	
petition to examine and inspect confidential	l)	Filed: February 19, 2001
Commercial/Industrial Service Rider tariff;)	
with respect to rates offered under)	
366.06(2) and 366.07, Florida Statutes,)	
for violation of Sections 366.03,)	Docket No. 000061-EI
Inc. against Tampa Electric Company)	
Corporation and Chemical Formulators,)	
In re: Complaint of Allied Universal)	

ALLIED/CFI'S NOTICE OF FILING SUPPLEMENTAL CONFIDENTIAL EXHIBIT TO REBUTTAL TESTIMONY AND 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, hereby give this Notice of Filing Supplemental Confidential Exhibit to Rebuttal Testimony and hereby file this Notice of Intent to Request Confidential Classification, and state as follows:

- 1. Concurrently with this Notice, Allied/CFI is filing one set of copies of Supplemental Confidential Exhibit RMN-20 to the Rebuttal Testimony of Robert M. Namoff, filed on January 22, 2001, in this proceeding. The documents are numbered: (1) 0000001 through 0000349-A; and (2) 0000441 through 0000532, and are being filed in an envelope marked "Confidential." An index to the documents is attached to this Notice as Exhibit A.
- 2. The documents being filed were produced to Tampa Electric Company ("TECO") on January 19, 2001, in response to TECO's First Request for Production of Documents (Nos. 1-12).

DOCUMENT NUMBER-DATE
02256 FEB 19 =

FPSC-RECORDS (REPORTING

Redacted copies of the documents were provided to counsel for Odyssey Manufacturing Company and Sentry Industries, Inc. on January 30, 2001.

- 3. One set of copies of the documents was filed on January 30, 2001, pursuant to a Notice of Intent to Request Confidential Classification. Allied/CFI hereby amends its earlier Notice of Intent to reflect that confidential classification of these same documents will be requested pursuant to this Notice.
- 4. The documents and the information contained in the documents for which confidential classification will be requested are intended to be and are treated by Allied/CFI as private and have not been publicly disclosed.
- 5. 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 Filing Supplemental Confidential Exhibit to Rebuttal Testimony and Notice of Intent to Request Confidential Classification was furnished by U. S. Mail, or by hand delivery(*), to the following this 19th day of February, 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

Harry W. Long, Jr., Esq. (*)
TECO Energy, Inc.
Legal Department
P. O. Box 111

Wayne L. Schiefelbein, Esq. (*) P. O. Box 15856 Tallahassee, FL 32317-5856

Tampa, FL 33601

John L. Wharton Rose, Sundstrom & Bentley 2548 Blairstone Pines Drive Tallahassee, FL 32301 Lee L. Willis, Esq.
James D. Beasley, Esq.
Ausley & McMullen
227 South Calhoun Street
Tallahassee, Florida 32301

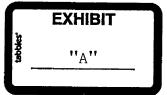
Patrick K. Wiggins, Esq. Wiggins & Villacorta P. O. Box 1657 Tallahassee, FL 32302

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

> HIM R EMG IOHN R. ELLIS

Index of Allied/CFI Documents filed January 30, 2001 [Conf. Ex. (RMN-20)]

April 26, 1999 fax to Robert Namoff from Peter DeAngelis re: engineering firms and salt suppliers
January 2000 Florida Trend article entitled "Come and Get It"
Cost and production estimates for proposed Membrane Cell Chlor Alkali Plant
February 27, 2000 fax to Bob Namoff from Peter DeAngelis re: cost and production estimates for proposed Chlor Alkali Plant
April 28, 1999 Fax to Bob Namoff from Peter DeAngelis containing salt supplier deliverability information to Tampa and Brunswick
May 3, 1999 fax to Bob Namoff from Peter DeAngelis concerning salt availability from Morton
Namoff's summary of April 23, 1999 meeting with Pete DeAngelis of CEP Associates re: plant costs, power costs, insurance and log sheets
September 29, 1997 Fortune article entitled: "Need Electricity: Call your Broker"
Chart of the principle of operation of membrane cell
Memo from Pete DeAngelis on the monopolar vs. bipolar chlor alkali units
Chart of principle of operation of the membrane cell
Memo from Peter DeAngelis on monopolar vs. bipolar chlor alkali units
Handwritten notes re: Allied Universal's Power and Salt requirements and salt costs
Letter to Robert Namoff from Peter DeAngelis dated May 12, 1999 with price quotes and delivery terms from two salt suppliers
"Cell Financing" folder
E-mails between Bob Namoff from Mike Koven dated June 28, 1999 re: industrial revenue bonds



32	Memo to Bob Namoff from Mike Koven dated July 6, 1999 re: bond information
33	"Co-Generation" folder
34	Handwritten phone message and notes re: 6/18 call from AGL Resources to Bob Namoff
35	"Conve and AVS" folder
36-48	July 1999 Conve Construcciones proposal for design and construction of membrane cell Chlor Alkali Plant
49	March 17, 1999 Conve Construcciones proposal cover letter
50	"Dupont Membranes" folder
51	Dupont business card
52	August 2, 1999 letter from Christopher Brickler to Bob Namoff on Nafion and membrane technology
53-58	Confidential Nafion abstract on membrane durability in chloralkali plants
59-66	Nafion Perfluorinated Membranes for the Chloralkali Industry brochure
67-78	Nafion Global Operating Experience with Ion Exchange Membranes in Modern Chloralkali Cell Technologies article by Dr. Hans Gerner and R.D. Theobald
79-85	Nafion customer service laboratories
86-93	Nafion technical information brochure on Nafion membranes for electrolysis product information
94	"Georgia Power" folder
95	Business cards from Georgia Power
96	Handwritten notes re: Georgia Power voltage, consumption, job credit, and sales tax exemption
97-99	Fax to Bob Namoff from William E. Edwards, Georgia Power, August 3, 1999 re Brunswick Project, with price quote

100	May 25, 1999 letter from William E. Edwards, Regional Economic Development Manager/Georgia Power to Bob Namoff, with price quote for Georgia site
101, 102	Fax to Larry Rodriguez, TECO from Bob Namoff June 25, 1999 forwarding Georgia Power's May 25, 1999 price quote
103	5/6/99 handwritten notes re: Georgia Power's price quote and sales tax exemption
104	Handwritten notes of R.M. Namoff re: Georgia Power price quote and terms
105, 106	Handwritten notes from July 23, 1999 on Georgia Power
106 A	Message for Bob from Bill Jacobsen of the Georgia Port Authority re: rail track
107	"Granite State" folder
108	Fax to Bob Namoff from Steve Sopora on 6/28/99 regarding Granite State mineral salt
109	"IDB Bond Financing" folder
110	Memo to Bob Namoff from Mike Koven July 6,1999 re: Bond information
111	Message to Bob from Hank Harris dated 6/16
112-131	July 28, 1999 fax to Mike Koven from Daniel McRae of Finance and Investment Transactions Group re: financing for the Brunswick project
132	"International Salt" folder
133	Business cards from International Salt
134	International Salt brochure
135	Business card from William Kohlsaat from International Salt Co.
136	Letter to Bob Namoff from William Kohlsaat regarding pricing information for salt to Brunswick and Tampa
137	Typical Analysis for Chilean Chemical Grades of Salt
138	Pictures of salt

139	International Salt Promotion Brochure
140	Picture of a salt tanker
141	International Salt Co. logo
142	Phone message regarding Granite Salt Minerals
143-145	Fax to Heinz Mezgolits from Robert Namoff dated July 14, 1999 re: Granite Salt Minerals specifications for evaporated salt
147	June 25, 1999 fax to Steve Sopora from Robert Namoff on the other salt supplier specs
148-149	November 11, 1999 fax to Robert Namoff from International Salt Company regarding the evaporated specs
150	International Salt Company specifications for evaporated salt
151-152	June 22, 1999 fax to Steve Sopora from Robert Namoff
153	International Salt purified evaporated salt specifications
154, 155	June 22, 1999 fax to Steve Sopora from Robert Namoff
156-159	Noram brochure
160	November 12, 1999 letter to Jim Palmer from Arthur Woods comparing International Salt to Dow
161	"Kvaerner Chemetics" folder
162-181	Kvaerner Chemetics Chloralkali Technology Preliminary Assessment Information
182	Chemetics
183	Handwritten notes to Kotzo
184	April 1, 1999 letter to Chuck Kotzo from Ivan Felsen regarding confidentiality agreement
185	Plans from Kvaerner Chemetics

190	Additional Kvaerner Chemetics plans
187-189	April 4, 1999 Kvaerner Chemetics project reference list
191-202	Kvaerner Chemetics "Focus on Technology
203-205	List of services available from Kvaerner Chemetics
206	Business information for Kvaerner Chemetics
207	April 22 message for Bob from Mike Rushton
208-209	Membrane cell technology comparison
210	Handwritten notes from 4/1/99
211, 212	Handwritten notes from 4/9/99
213, 214	March 23, 1999 questions and answers on Kvaerner Chemetics
215, 216	April 11, 1999 summary of the Chlorine Institute trip
217-221	April 7, 1999 Kvaerner Chemetics Plant performance documents and handwritten notes
222, 222A	June 24, 1999 handwritten notes and phone number
223	"Morton Salt" folder
224	July 19, 1999 fax to Robert Namoff from Steve Sopora regarding the Morton Salt specifications
225,226	August 4, 1999 fax to Bob Namoff from John Menz regarding the proposed sodium hypochlorite facility in Brunswick, Georgia
227, 228	July 16, 1999 fax to Bob Namoff from Trip Miller regarding the PDS on bulk industrial crude solar salts
229, 230	Fax to Steve Sopora from Bob Namoff dated July 16, 1999 for his review
231	May 5 message to Bob from Dow Chemical
232	"Noram" folder

233	Noram business cards
234-236	Conve pictures
237	June 7 message for Bob from John King
238, 239	Noram's operating cost estimate for solar and evaporated salts
240	June 24, 1999 Noram handwritten notes
241-242	May 11 fax to Bob Namoff from Steve Sopora regarding questions to be resolved
243	May 17, 1999 Noram operating cost estimate for ECU
244,245	May 14, 1999 fax to Bob Namoff from Steve Sopora with a crude estimate of the ECU cost
246	May 7, 1999 fax from John King to Bob Namoff confirming a business meeting
248, 249	May 11,1999 handwritten notes
250-275	May 7, 1999 preliminary design basis for sodium hypochlorite plant
276	May 4, 1999 International Salt Company purified evaporated salt specifications
278	June 22, 1999 to Steve Sopora from Bob Namoff regarding specs
279	July 12,1999 letter to Bob Namoff from Steve Sopora regarding the revised proposal
280, 281	June 15, 1999 fax to Bob Namoff from Steve Sopora regarding price information for Brunswick and Tampa plants
282	June 16, 199 fax to Bob Namoff from Steve Sopora regarding the budget estimate for total installed cost of a hydrochloric acid synthesis system
283, 284	June 15, 1999 fax to Bob Namoff from Steve Sopora with a revised operating cost estimate for ECU
285	Notes on George Warborough from the desk of R. M. Namoff
286, 287	May 12, 1999 letter to Bob Namoff from Peter DeAngelis discussing two salt suppliers that have offered evaporated salt to Allied

288-290	July 12, 1999 fax to Bob Namoff from Steve Sopora with the revised ECU cost estimate for base and expanded plants
291-310	Pre-qualification document for a sodium hypochlorite plant from Noram May 5, 1999
313-348	July 12, 1999 budget proposal for equipment and engineering for a sodium hypochlorite plant submitted by Noram
349	June 11, 1999 letter from Steve Sopora from Bob Namoff discussing proposal number C0524 Revision A
349A	April 16, 1999 Cell Analysis with handwritten notes
441	"Oxytech Systems" folder
442	June 23, 1999 e-mail to Cathy Gillarmod from Heinz Mezgolits reply to plant
443	May 7, 1999 fax to Bob Namoff from Dermot Gosser referring another ETC company which is Conve Construcciones
444	April 28, 1999 fax to Bob Namoff from Dermot Gosser confirming details for Oxytech
445	"PCI Cell Analysis" folder
446-455	Financial work sheets with notes for Allied Universal
456	"Salt Cost" folder
457	June 17, 1999 message for Bob from Jack Kassabian from International Salt
458-464	Chilean salt brochure
465, 466	June 21, 1999 Confidentiality Agreement with International Salt
467	Letter to Bob Namoff with estimated pricing from International Salt for Tampa and Brunswick
468	Customer letter from William Kohlsaat and Robert Jones of International Salt discussing formation of a new company
469	"TECO Power" folder

470	Business cards of Tampa Electric and Georgia Power
471	June 15, 1999 handwritten notes
472	June 6, 1999 fax to Bob Namoff from Larry Rodriguez with customer information required to evaluate the feasibility of CISR Application
473	Handwritten power costs analysis numbers
474	June 2, 1999 letter to William Ashburn from Bob Namoff about TECO as the supplier of electric power
475	Tampa Electric April 14, 1999 bill
476, 477	June 22, 1999 Confidentiality Agreement between Allied and Tampa Electric
478-480	Fax of the signed Confidentiality Agreement between Bob Namoff and Larry Rodriguez
481	September 29, 1999 Fortune article titled "Need Electricity-Call Your Broker"
482	July 19, 1999 draft of TECO's non-price terms and conditions
483, 484	Maps of electricity by state; notes of price terms
485	August 25, 1999 Affidavit of Robert Namoff
486, 487	Fax to Larry Rodriguez to Bob Namoff dated August 26, 1999 re: the affidavit
488, 489	July 15, 1999 letter to Larry Rodriguez from Bob Namoff forwarding proposal for construction of the bleach plant in Tampa or Georgia
490	May 19, 1999 fax to Bob Namoff from Steve Foster of Georgia Power regarding power requirements, with handwritten notes
491, 492	June 21, 1999 letter to Larry Rodriguez from Bob Namoff responding to questions re: load and service requirements
493-498	October 18, 1999 letter to Bob Namoff from Larry Rodriguez re: Proposed CISR Rate Terms Sheet/ Proposed Power Purchase Agreement Terms Sheet
499, 500	November 6, 1999 solicitation letter to James Davis of Davis Supply from Patrick Allman of Odyssey Manufacturing re: Odyssey

501, 502	August 11, 1999 letter to Larry Rodriguez from Bob Namoff regarding the CISR information
502A	August 11, 1999 Allied Universal Corp. CISR information fax to Bob Namoff from Larry Rodriguez
503-514	Financial Project Analysis for Allied Universal in Brunswick, Georgia, Plant Size
515-517	Fax to Bob Namoff from Lucky Garcia at Florida Power & Light with map and rate use summaries
518, 519	January 2000 Florida Trend Article entitled "Come and Get It" with handwritten notes
520	August 19, 1999 letter to Larry Rodriguez from Bob Namoff in reference to his two most recent questions for the Tampa facility
521	Fax Verification Report from August 19, 1999
522-526	Tampa Electric Company Tariff Agreement for the Purchase of Interruptible Service, "with note: given by Larry 6/99"
527-529	Tampa Electric Company Industrial Interruptible Service tariff 6.090 with note, "Given to RN by Larry 6/99"
530	Tampa Electric tariff sheet nos. 6.020, 6.021 re: additional billing charges effective March 31, 1999
532	Map with directions to TECO Plaza faxed May 12, 1999

F:\USERS\JELLIS\bates. docsum.wpd