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May 8, 2001

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RECEIVED-FPSC
MAY - 8 PM 3:41
RECORDS AND REPORTING

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

Re: Complaint of Allied Universal Corporation and Chemical Formulators,
Inc. against Tampa Electric Company; Docket No. 000061-EI

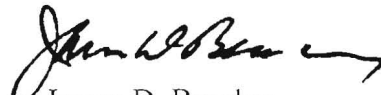
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Supplemental Request for Confidential Classification of Deposition Transcript of Witness Pamela Winters.

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,



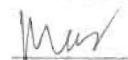
James D. Beasley

JDB/pp
Enclosure

ALL
DAP
GMP
GJM
LIR
ECR
LEG
OPC
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SEC
SER
OTH

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

RECEIVED & FILED


FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

05819 MAY-8 2001

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint of Allied Universal)
Corporation and Chemical Formulators,)
Inc. against Tampa Electric Company.)
_____)

DOCKET NO. 000061-EI
FILED: May 8, 2001

**TAMPA ELECTRIC COMPANY'S SUPPLEMENTAL
REQUEST FOR CONFIDENTIAL CLASSIFICATION
OF DEPOSITION TRANSCRIPT OF WITNESS PAMELA WINTERS**

Tampa Electric Company ("Tampa Electric" or the "company") pursuant to Order No. PSC-01-1003-AS-EI ("Order No. 01-1003") issued in this proceeding on April 24, 2001, submits the following Supplemental Request for Confidential Classification of portions of the deposition transcript of witness Pamela Winters in this proceeding and, as grounds therefor, says:

1. Order No. 01-1003 approved the settlement agreed to by and between Tampa Electric and Allied Universal Corporation and Chemical Formulators, Inc. ("Allied"). That order called for the parties to submit confidentiality requests with respect to the testimony and exhibits of their respective witnesses, after which each party would have an opportunity to respond and to supplement any request for confidential classification.

2. Odyssey Manufacturing Company and Sentry Industries, Inc. ("Odyssey") have not requested confidential classification of any portion of the deposition transcript of Odyssey's witness Pamela Winters. Tampa Electric has reviewed the deposition transcript of this witness and has determined that portions of the transcript are in need of confidential classification and exemption from public disclosure in order to protect the interests of Tampa Electric and its customers and in order to avoid disclosure of confidential contract service arrangement ("CSA") related information.

3. Tampa Electric is simultaneously filing under a separate transmittal letter on a confidential basis a copy of the deposition transcript of witness Winters with the confidential information highlighted in yellow. Attached hereto as Exhibit "A" are written justifications for the confidential classification of the highlighted portions of the deposition transcript of this witness. As is explained in greater detail in Tampa Electric's written justifications, the highlighted information is entitled to protection against public disclosure pursuant to Section 366.093, Florida Statutes, and the Commission's implementing Rule 25-22.006, Florida Administrative Code.

4. This will confirm that the material for which confidential classification is sought is intended to be and is treated by Tampa Electric as private and has not been disclosed publicly.

5. Order No. 01-1003 states that, consistent with Rule 25-22.006, Florida Administrative Code, all parties will be afforded an opportunity to respond to or supplement any request for confidential treatment. Tampa Electric has prepared a redacted public version of the deposition transcript of witness Winters with the information that is the subject of this confidentiality request redacted. Tampa Electric does not want to file the public version of the deposition transcript before determining whether Allied wishes to provide any supplemental requests pertaining to the deposition transcript of witness Winters. The company is furnishing copies of its Supplemental Request for Confidential Classification to counsel for Allied and Odyssey to review. In order to determine whether Allied seeks to file any supplemental request pertaining to witness Winters deposition transcript, Tampa Electric is temporarily withholding the Commission's redacted public version of this transcript and will file it after the later of (a) the May 15, 2001 expiration of the fourteen day review period as set forth in Rule 25-22.006, Florida Administrative Code, or (b) if any supplemental requests from Allied is forthcoming, the final disposition of such supplemental requests.


WHEREFORE, Tampa Electric requests confidential classification of the highlighted portions of the deposition transcript of Odyssey's witness Pamela Winters for the reasons set forth in Exhibit "A" hereto.

DATED this 8th day of May 2001.

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
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(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Supplemental Request for Confidential Classification of Deposition Transcripts and Exhibits, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (*) on this 8th day of May 2001 to the following:

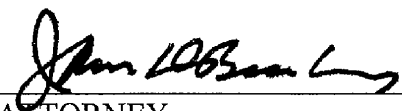
Mr. Robert V. Elias*
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Bryant & Yon
108 East College Avenue -- 12th Floor
Tallahassee, FL 32301



ATTORNEY

**Justification for Confidentiality of Portions of the Deposition Transcript
and, as Applicable, Deposition Exhibits of Witness Pamela Winters**

<u>PAGE</u>	<u>LINE(S)</u>	<u>DESCRIPTION</u>	<u>RATIONALE</u>
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10	13	Numeric value	(1)
11	8	Numeric value	(1)
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Rationale for Confidentiality:

- (1) This type of information would disclose negotiated terms and conditions of either the Odyssey CSA or the Allied CSA. As provided in Tampa Electric's Commission approved Original Tariff Sheet No. 6.720, CSAs shall be considered confidential documents. As the Commission stated in its Order No. PSC-00-1530-PCO-EI issued in this proceeding on August 23 2000, the CISR tariff imposes an affirmative obligation on Tampa Electric not to disclose the information in the CSA other than to the Commission or the Commission's Staff. Public disclosure of this information would harm the interests of Tampa Electric and its general body of ratepayers in future CISR negotiations and would impose a definite chilling effect on the willingness of other at-risk customers to supply information of a business nature in CISR negotiations. As such, this information is entitled to protection against public disclosure under Section 366.093(3)(d) and (e), Florida Statutes.