

ORIGINAL

**RUTLEDGE, ECENIA, PURNELL & HOFFMAN**

PROFESSIONAL ASSOCIATION  
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA  
KENNETH A. HOFFMAN  
THOMAS W. KONRAD  
MICHAEL G. MAIDA  
MARTIN P. McDONNELL  
J. STEPHEN MENTON

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

TELEPHONE (850) 681-6788  
TELECOPIER (850) 681-6515

R. DAVID PRESCOTT  
HAROLD F. X. PURNELL  
MARSHA E. RULE  
GARY R. RUTLEDGE  
GOVERNMENTAL CONSULTANTS  
MARGARET A. MENDUNI  
M. LANE STEPHENS

April 18, 2002

Ms. Blanca Bayo, Director  
Commission Clerk and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RECEIVED FPSC  
02 APR 18 PM 4:02  
COMMISSION CLERK

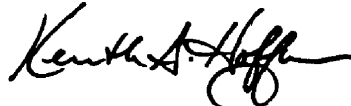
Re: Docket No. 000061-EI

Dear Ms. Bayo:

Enclosed for filing on behalf of Allied Universal Service Corporation and Chemical Formulators, Inc. (collectively "Allied/CFI") are an original and fifteen copies of Allied/CFI's Joinder in Support of Tampa Electric Company's Request for Return of Confidential Documents or, in the Alternative, For an Extension of the Confidential Protection afforded such Documents by the Commission.

Please acknowledge receipt of these documents by date stamping the enclosed copy of this letter "filed" and returning it to the undersigned.

Sincerely,



Kenneth A. Hoffman

- AUS \_\_\_\_\_
  - CAF \_\_\_\_\_
  - CMP \_\_\_\_\_
  - COM \_\_\_\_\_
  - CTR \_\_\_\_\_
  - ECR \_\_\_\_\_
  - GCL \_\_\_\_\_
  - OPC \_\_\_\_\_
  - MMS \_\_\_\_\_
  - SEC \_\_\_\_\_
  - OTH \_\_\_\_\_
- KAH/rl  
—Enclosures  
—Allied.bayo418

RECEIVED & FILED  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE  
04325 APR 18 02  
FPSC-COMMISSION CLERK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Complaint of Allied Universal )  
Corporation and Chemical Formulators, )  
Inc. against Tampa Electric Company )  
for violation of Sections 366.03, )  
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 )  
information; and request for expedited )  
relief. )  
\_\_\_\_\_ )

Docket No. 000061-EI

Filed: April 18, 2001

**ALLIED/CFI'S JOINDER IN SUPPORT OF  
TAMPA ELECTRIC COMPANY'S REQUEST  
FOR RETURN OF CONFIDENTIAL DOCUMENTS OR,  
IN THE ALTERNATIVE, FOR AN EXTENSION OF THE  
CONFIDENTIAL PROTECTION AFFORDED  
SUCH DOCUMENTS BY THE COMMISSION**

Allied Universal Corporation and Chemical Formulators, Inc. (collectively "Allied/CFI"), by and through its undersigned counsel, hereby files this Joinder in Support of the Request filed by Tampa Electric Company ("TECO") for return of confidential documents or, alternatively, for an extension of the confidential protection afforded such documents by the Commission and, as grounds therefor, states as follows:

1. Allied/CFI adopts and incorporates by reference the grounds for relief set forth in TECO's Request filed April 15, 2002.

2. With respect to Allied/CFI, numerous confidential documents, including prefiled testimony and exhibits and deposition transcript and exhibits, have been filed and made a part of the record pursuant to the Settlement Agreement entered into between Allied and TECO. Other confidential documents have been filed which are not a part of the record. Documents and information filed by Allied have been granted confidential classification pursuant to Order Nos.

DOCUMENT NUMBER-DATE

04325 APR 18 2001

FPSC-COMMISSION CLERK

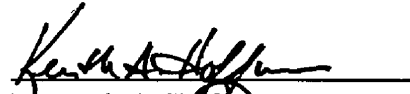
PSC-01-1003-AS-EI issued April 24, 2001; Order No. PSC-01-1442-CFO-EI issued July 5, 2001; Order No. PSC-01-2251-CFO-EI issued November 16, 2001; and Order No. PSC-01-2253-CFO-EI issued November 16, 2001.

3. Pursuant to Section 366.093(2), Florida Statutes, and Order No. PSC-01-0401-PHO-EI issued February 16, 2001, Allied supports TECO's request that any documents and information which have determined to be confidential but have not been entered into the record of the proceeding be returned to the respective provider of the information.

4. Alternatively, and consistent with TECO's request, Allied/CFI requests that all of the documents granted confidential treatment that are not part of the record in this proceeding, if not returned to the provider of the documents, continue to be treated as confidential. As an alternative suggestion to that recommended by TECO, Allied/CFI would suggest that if confidential documents (that are not part of the record) are not returned, then all such confidential documents not entered into the record be maintained as confidential for one period of time (perhaps January 1, 2004) applicable to all such documents.

WHEREFORE, Allied/CFI joins in and supports TECO's request that all documents and information deemed by the Commission to be confidential and which were not made a part of the record of this proceeding be returned to the supplying party, pursuant to Section 366.093(2), Florida Statutes, and, in the alternative, that the confidential classification period applicable to any and all such documents be extended for a period of time and time certain to be determined by the Commission applicable to all such confidential documents.

Respectfully submitted,



Kenneth A. Hoffman, Esq.  
Rutledge, Ecenta 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)

Attorneys for Allied Universal Corporation and  
Chemical Formulators, Inc.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was furnished by U. S. mail to the following this 18th day of April, 2002.

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

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

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

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

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

John L. Wharton  
Rose, Sundstrom & Bentley  
2548 Blairstone Pines Drive  
Tallahassee, FL 32301

  
\_\_\_\_\_  
Kenneth A. Hoffman