

AUSLEY & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

ORIGINAL

June 24, 2002

HAND DELIVERED

RECEIVED- FPSC
02 JUN 24 PM 3:25
COMMISSION
CLERK

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

Re: Review of Investor-Owned Electric Utilities' Risk Management Policies and
Procedures; FPSC Docket No. 011605-EI


Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies Tampa
Electric Company's Supplemental Request for Confidential Treatment.

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

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

Confidential 71, 72, 74, 78
DOCUMENT NUMBER-DATE
06490 JUN 24 02
FPSC-COMMISSION CLERK

RECEIVED & FILED



FPSC-BUREAU OF RECORD

Supplement Request Confidential 65, 66, 71+72
DOCUMENT NUMBER-DATE DOCUMENT NUMBER-DATE

06488 JUN 24 02 06489 JUN 24 02

FPSC-COMMISSION CLERK FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Review of Investor-Owned)	DOCKET NO. 011605-EI
Electric Utilities' Risk Management)	FILED: June 24, 2002
Policies and Procedures)	
_____)	

**TAMPA ELECTRIC COMPANY'S SUPPLEMENTAL
REQUEST FOR CONFIDENTIAL TREATMENT**

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, submits this its Supplemental Request for Confidential Treatment of certain portions of the Bureau of Regulatory Review's Audit of Internal Controls of Florida's Investor-Owned Utilities for Fuel and Wholesale Energy Transactions ("Staff's Audit Report") and, as grounds therefore, says:

1. On June 11, 2002, Tampa Electric Company submitted its initial request for confidential treatment of Portions of Staff's Audit Report. At that time the Staff's Audit Report was still in draft form. A copy of Tampa Electric's June 11 filing is attached hereto as Exhibit "A". Since the pagination of the Final Staff Audit Report differs from the earlier draft, this Supplemental Request is intended to apply to the Final Staff Audit Report whereas the company's June 11 request still applies to the earlier draft report. All further references herein to the Staff's Audit Report pertain to the final version of that report.

2. Tampa Electric requests confidential treatment of the two percentage amounts contained in paragraph no. 5 on page 71 of Staff's Audit Report. The two percentage amounts in question, if disclosed publicly, would place Tampa Electric at a competitive disadvantage in its fuel procurement efforts as it would disclose to potential suppliers Tampa Electric's priorities concerning reliance on different duration of fuel supply arrangements. Disclosing the duration of

DOCUMENT NUMBER - DATE
06488 JUN 24 2002
FPSC-COMMISSION CLERK

the agreement would inform other potential suppliers concerning the extent to which Tampa Electric is willing to enter into gas supply contracts of a given term. This could adversely affect Tampa Electric in future negotiations and ultimately have an adverse impact on Tampa Electric's retail customers. As such, the information in question constitutes contractual data, the disclosure of which would impair the efforts of Tampa Electric to contract for goods and services on favorable terms. This being the case the information in question is entitled to protection as confidential proprietary business information pursuant to Section 366.093(3)(d), Florida Statutes. Tampa Electric has not disclosed this type of information and doing so in the Staff's Audit Report would place Tampa Electric at a competitive disadvantage.

3. All of the information contained in Exhibit 19, set forth on page 72 of the Staff's Audit Report is in need of confidential protection. Exhibit 19 discloses a portion of Tampa Electric's purchasing plan. This would place Tampa Electric at a competitive disadvantage in fuel procurement as it would disclose to potential suppliers Tampa Electric's priority concerning reliance of different types of fuels and the duration of fuel contracts. As such, Exhibit 19 contains confidential information the public disclosure of which would harm Tampa Electric's ability to contract for goods and services on favorable terms. As such, the information in question is entitled to protection pursuant to Section 366.093(3)(d), Florida Statutes. Tampa Electric has never disclosed this type of information and doing so in the Staff's Audit Report would place Tampa Electric at a competitive disadvantage.

4. All of the Tampa Electric related information contained in subsection B, appearing at pages 77 through most of page 78 of the Staff's Audit Report, is entitled to confidential protection. Subsection B discloses Tampa Electric's fossil fuel procurement and wholesale purchased power plans. Public disclosure of the information contained in subsection

B would put Tampa Electric at a competitive disadvantage in procuring fossil fuel and purchased power by disclosing to potential suppliers the company's strategic plans, thereby enabling the suppliers to tailor their bids in a manner likely to generate higher profits for the suppliers and greater costs to Tampa Electric and its general body of ratepayers. As such, the information in question constitute data the disclosure of which would impair Tampa Electric's efforts to contract for goods or services on favorable terms. As such, the information is entitled to confidential treatment pursuant to Section 366.093(3)(d), Florida Statutes.

5. Tampa Electric is filing under a separate cover letter a confidential version of each page of the Staff's Audit Report containing confidential information, with the confidential information highlighted in yellow. Two redacted (public) versions of the Staff Audit Report accompany this supplemental request.

WHEREFORE, Tampa Electric Company urges the Commission to treat as confidential proprietary business information and exempt from public disclosure pursuant to Section 366.093, Florida Statutes, the confidential information described in this supplemental request for confidential treatment, said information being contained in the Commission Staff's Final Audit Report.

DATED this 24th day of June 2002.

Respectfully submitted,



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 Supplemental Request for Confidential Treatment, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (*) on this 24th day of June 2002 to the following:

Mr. Wm. Cochran Keating IV*
Senior Attorney
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Mr. John W. McWhirter, Jr.
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
Post Office Box 3350
Tampa, FL 33601

Ms. Vicki Gordon Kaufman
Mr. Joseph A. McGlothlin
McWhirter, Reeves, McGlothlin, Davidson,
Decker, Kaufman, Arnold & Steen, P.A.
117 S. Gadsden Street
Tallahassee, FL 32301

Mr. R. Wade Litchfield
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420

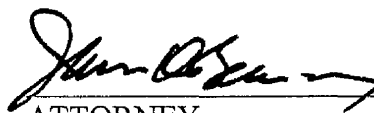
Ms. Susan D. Ritenour
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0780

Mr. Jeffrey A. Stone
Mr. Russell A. Badders
Beggs and Lane
Post Office Box 12950
Pensacola, FL 32576-2950

Mr. William G. Walker III
Florida Power & Light Company
215 S. Monroe Street, Suite 810
Tallahassee, FL 32301-1859

Mr. James A. McGee
Florida Power Corporation
One Progress Plaza, Suite 1500
St. Petersburg, FL 33733-4042

Mr. Rob Vandiver
Deputy Public Counsel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400



ATTORNEY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Internal Controls of)
Florida's Investor-Owned Utilities for)
Fuel and Wholesale Energy Transactions.)
_____)

UNDOCKETED
FILED: June 11, 2002

**TAMPA ELECTRIC COMPANY'S
REQUEST FOR CONFIDENTIAL TREATMENT**

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby requests confidential treatment of certain portions of the Bureau of Regulatory Review's Audit of Internal Controls of Florida's Investor-Owned Utilities for Fuel and Wholesale Energy Transactions ("Staff's Audit Report") and portions of Tampa Electric's response thereto. As grounds therefore, the company says:

1. On page 65 of the Staff's Audit Report, reference is made to the duration of a gas transportation supply contract. The duration of the contract is a negotiated term and disclosure of it to the public would disadvantage Tampa Electric in future negotiations for other gas supply contracts. Disclosing the duration of the agreement would inform other potential suppliers concerning the extent to which Tampa Electric is willing to enter into gas supply contracts of a given term. This could adversely affect Tampa Electric in future negotiations and ultimately have an adverse impact on Tampa Electric's retail customers. As such, the information in question constitutes contractual data, the disclosure of which would impair the efforts of Tampa Electric to contract for goods and services on favorable terms. This being the case the information in question is entitled to protection as confidential proprietary business information pursuant to Section 366.093(3)(d), Florida Statutes.

2. All of the information contained in subsection B, appearing at pages 71 through most of page 72 of the Staff's Audit Report, is entitled to confidential protection. Subsection B discloses Tampa Electric's fossil fuel procurement and wholesale purchased power plans. Public disclosure of the information contained in subsection B would put Tampa Electric at a competitive disadvantage in procuring fossil fuel and purchased power by disclosing to potential supplier the company's strategic plans, thereby enabling the suppliers to tailor their bids in a manner likely to generate higher profits for the suppliers and greater costs to Tampa Electric and its general body of ratepayers. As such, the information in question constitute data the disclosure of which would impair Tampa Electric's efforts to contract for goods or services on favorable terms. As such, the information is entitled to confidential treatment pursuant to Section 366.093(3)(d), Florida Statutes.

3. Exhibit 19, appearing on page 66 of the Staff's Audit Report, discloses a portion of Tampa Electric's purchasing plan. This would place Tampa Electric at a competitive disadvantage in fuel procurement as it would disclose to potential suppliers Tampa Electric's priority concerning reliance of different types of fuels and the duration of fuel contracts. As such, Exhibit 19 contains confidential information the public disclosure of which would harm Tampa Electric's ability to contract for goods and services on favorable terms. As such, the information in question is entitled to protection pursuant to Section 366.093(3)(d), Florida Statutes. Tampa Electric has never disclosed this type of information and doing so in the Staff's Audit Report would place Tampa Electric at a competitive disadvantage.

4. Tampa Electric does not yet have a final version of the Staff's Audit Report, but when it does it will submit under a separate cover letter copies of the pages of the Staff's Audit Report containing the confidential information in question with that confidential information

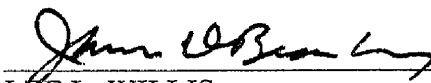
highlighted in yellow. The company will also supplement this request with two copies each of the pages in question from the Audit Report with the confidential information redacted.

5. Tampa Electric treats the information that is the subject of this request confidentially and has not disclosed it publicly.

WHEREFORE, Tampa Electric Company urges the Commission to treat as confidential proprietary business information and exempt from public disclosure pursuant to Section 366.093, Florida Statutes, the confidential information described above.

DATED this 11th day of June 2002.

Respectfully submitted,



LEE L. WILLIS
JAMES D. BEASLEY
Ausley & McMullen
Post Office Box 391
Tallahassee, Florida 32302
(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY