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May 13, 2004

VIA HAND DELIVERY

MARTIN S. FRIEDMAN, P.A.
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(LICENSED IN TEXAS ONLY)

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

Re: Docket No. ~~000061-EI~~

040086-EI MR

Dear Ms. Bayo:

Attached are the original and fifteen copies of Odyssey Manufacturing Company's Request for Confidential Classification in the above-referenced docket.

Sincerely,

ROSE, SUNDBSTROM & BENTLEY, LLP



David F. Chester, Esq.
For The Firm

DFC/lah

Enclosures

CMP _____
COM _____
CTR _____
ECR 1
GCL 1
GPC _____
MMS _____
RCA _____
SCR _____
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Allied Universal Corporation and)
Chemical Formulators, Inc.'s Petition to) Docket No. 040086-EI
Vacate Order No. PSC-01-1003-AS-EI) Filed: May 13, 2004
Approving, as Modified and Clarified, the)
Settlement Agreement between Allied)
Universal Corporation and Chemical)
Formulators, Inc., and Tampa Electric)
Company and Request for Additional)
Relief.)
_____)

REQUEST FOR CONFIDENTIAL CLASSIFICATION

Odyssey Manufacturing Company ("Odyssey"), by and through undersigned counsel and pursuant to Rule 25-22.006(4)(a), Florida Administrative Code, files this Request for Confidential Classification and states as follows:

1. On April 22, 2004, Circuit Judge Michael B. Chavies signed the Agreed Order on Defendants' Emergency Motion for Contempt and for Sanctions in Allied Universal Corporation, et al, v. Odyssey Manufacturing Company, et al, Case No. 01-27699 CA25 in the Circuit Court of the 11th Judicial Circuit in and for Miami-Dade County, Florida. The Agreed Order provides in part that:

The parties are hereby permitted to file any and all documents and deposition transcripts obtained during the captioned matter with the Florida Public Service Commission ("PSC"), Docket No. 040086-EI, subject to said party seeking confidential classification thereof pursuant to Rule 25-22.006, F.A.C.

2. On the same date Judge Chavies signed the Agreed Order, Odyssey filed its Notice of Intent to Seek Confidential Classification of portions of the transcript of the December 18, 2003

deposition of Stephen Sidelko in the aforesaid circuit court proceeding, and a January 23, 2004 errata sheet, as signed by Stephen Sidelko. Odyssey filed therewith a complete copy of said deposition transcript and errata sheet, together with a copy of said Agreed Order.

3. Odyssey submits that said transcript and errata sheet are documents containing “Confidential Information” subject to the aforesaid Agreed Order and the related September 2002 Protective Order entered in the circuit court proceeding. Odyssey previously filed said Protective Order in the docket on February 13, 2004 as Exhibit “A” to the Emergency Motion for Contempt and for Sanctions, which itself was appended to Odyssey’s Emergency Motion for Abeyance.

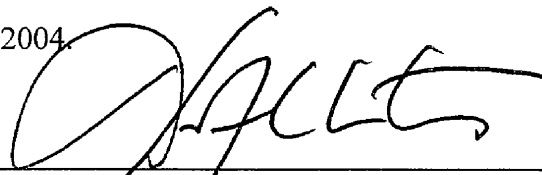
4. Attached hereto as Exhibit “A” is a categorization of the information which Odyssey has redacted from the aforesaid deposition transcript and errata sheet as submitted with its April 22, 2004, Notice of Intent to Seek Confidential Classification.

5. The information for which confidential classification is requested in categories 1, 2, and 3 of Exhibit “A” hereto is intended to be, and is treated by Odyssey as, private and has not been publicly disclosed.

6. The information for which confidential classification is requested in categories 4 and 5 of Exhibit “A” is, on information and belief, intended to be and is treated by Allied Universal Corporation (“Allied”) and/or Chemical Formulators, Inc. (“CFI”), and/or Tampa Electric Company as private, and, on information and belief, has not been publically disclosed.

Wherefore, Odyssey Manufacturing Corporation requests that its Request for Confidential Classification be granted.

Respectfully submitted this 13th day of May, 2004.



DAVID F. CHESTER, ESQ.

Fla. Bar No. 146293

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Attorneys for Odyssey Manufacturing Company

Exhibit "A"

1. Odyssey has redacted from the deposition transcript and errata sheet the following references to its own CISR rate (original rate, escalation factor, adjusted rates):

<u>Pages (Electronic)</u>	<u>Lines</u>
186	23
187	5
188	2, 7, 8, 10, 11, 12, 18
189	2, 25
190	8, 13, 19
191	12, 25
192	6
193	10, 12, 17, 24
194	3, 11, 25
195	5, 16
196	21
197	24
198	4, 11, 17
200	4
201	8
202	8, 21, 25
203	15
204	6, 11
205	6, 13, 15, 17, 21
206	3, 23
207	2, 5, 7, 11, 14, 20, 21, 23
208	8
210	10, 21, 22
211	1
244	23
245	1, 2, 5, 6, 9, 10, 12, 13, 14, 17
246	10, 22
247	2, 3, 9, 10, 11, 12
248	14
249	18
250	6, 10, 11, 13, 14, 17, 20, 25
251	3, 5, 8, 24
252	1, 4, 18, 19

253	18, 22, 25
254	5
255	18, 19
283	16
286	3
Errata sheet:	last word in "Change" column next to page 205, line 10 reference.

These values equate to Odyssey's original CISR rate, the rate in effect after application of the specified escalation factor set forth in the CSA between Odyssey and Tampa Electric Company, or said escalation factor itself. The PSC has previously recognized that Odyssey's CISR rate qualifies for confidential classification, in Docket No. 000061-EI.

2. Odyssey has redacted from the deposition transcript the following references to data pertaining to the present and anticipated capacity of its plant, its sales, productivity, and profits (actual and/or hypothetically calculated), and other proprietary information related to its manufacturing processes, finances, and operations.

<u>Pages (Electronic)</u>	<u>Lines</u>
211	10
212	1, 4, 7, 17, 18, 25
213	1, 5, 8, 12, 13, 15, 16, 17, 18, 19, 21
214	1, 10, 12, 13, 14, 16, 17, 19, 20, 21, 22, 23, 24, 25
215	3, 6, 10, 24
216	2, 3, 7, 8, 18, 21, 22, 24
217	1, 2, 3, 7, 9, 10, 14
218	21, 22, 24, 25
219	1, 3, 19
220	4, 6, 18
236	4, 10
242	19
243	6, 23
246	12, 13, 15, 16, 22, 23, 25
247	5, 6, 8, 9, 10, 11, 12, 13, 14, 19, 21, 22, 23, 25
248	1, 4, 5, 6, 7, 23, 24, 25
249	1

256	15, 16
257	9, 10
259	24
260	7, 8, 9, 13, 18, 19
261	4
272	17, 18, 19, 20
273	1
277	18, 19, 20
278	3, 4, 5
287	17, 18, 19, 20

3. Odyssey has redacted from the deposition transcript the following references to the identity of its customers:

<u>Pages (Electronic)</u>	<u>Lines</u>
263	23, 24, 25
264	1, 2, 3, 6, 11, 19, 21
265	4, 6, 7, 9, 14, 18, 22
266	3, 13, 21, 23
268	21
271	13
297	5, 8, 10, 11
298	7, 9, 14

4. Odyssey has in good faith redacted from the deposition transcript the following references to the CISR rate, and approximations thereof, and collateral matters related thereto, which it understands was negotiated between Tampa Electric Company and Allied Universal Corporation and/or Chemical Formulators, Inc.

<u>Pages (Electronic)</u>	<u>Lines</u>
188	23
245	22
246	4, 10, 23
248	8, 11, 12, 13, 16, 17, 21
249	17
251	9
252	24
253	4
254	6, 23
255	7, 23

5. Odyssey has in good faith redacted from the deposition transcript the following references to Allied/CFI which on information and belief may be proprietary information of such companies.

<u>Pages (Electronic)</u>	<u>Lines</u>
261	4
287	17, 18, 19, 20

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification has been furnished via U.S. Mail to the following on this 13th day of May, 2004:

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J. Stephen Menton, Esq.
Rutledge, Eçenia, Purnell & Hoffman, P.A.
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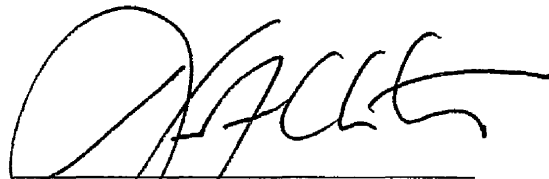
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David F. Chester, Esq.

Odyssey/Request for Confidential Classification wpd