

State of Florida



ORIGINAL

Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD  
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M COMMISSION CLERK

**DATE:** October 6, 2004

**TO:** Adrienne Vining, Senior Attorney, General Counsel *RUF WBN*

**FROM:** Ralph J. VonFossen, Economic Analyst, Division of Economic Regulation

**RE:** Docket No. 040001 - EI, Fuel and Purchased Power Cost Recovery Clause, Request for Confidentiality of Document No. 09858-04

On September 9, 2004, Tampa Electric Company (TECO) filed its request for confidential classification for Document No. 09858-04. This document consists of TECO's Fuel Procurement and Wholesale Power Purchases Risk Management plan for 2004, for which the utility has requested confidentiality be granted for a period of three years.

TECO contends that disclosure of the highlighted information in the Plan would disclose its purchasing strategy (both with respect to fuel and purchased power) and the company's planned risk exposure. Those who have an interest in supplying TECO's fuel and purchased power needs could use this valuable information to help them force more favorable terms, to the detriment of the utility and its ratepayers. They could learn of the company's plans and needs and use that information in exacting better prices for meeting those needs.

Disclosure of the highlighted information in the Plan would also provide highly sensitive information to recipients regarding the manner and timing of TECO's entry into the fuel and purchased power markets. Knowledge of this information would allow the opportunity for market manipulation through transactions made in anticipation of the company's entry into the market. Market manipulations based on knowledge of the highlighted information would increase the price of fuel and purchased power paid by TECO's customers as well as the price paid by the company to hedge the customers' price of fuel and purchased power. These effects of disclosure would impair the efforts of TECO to contract for goods and services on favorable terms for the benefit of its customers.

**CTR** \_\_\_\_\_ Staff has reviewed this document and recommends that TECO's confidentiality request  
**ECR** \_\_\_\_\_ be approved with the following exception. Confidentiality should be denied for the portion of the  
**GCL** \_\_\_\_\_ document as detailed below.

**OPC** \_\_\_\_\_ Page 10, all of Column 1 (Total purchases)

**MMS** \_\_\_\_\_ This information is contained, unredacted, in Schedules E7 and E8 of the testimony of  
**RCA** \_\_\_\_\_ Denise Jordan filed in this docket. Additionally, the total of this column appears unredacted on  
**SCR** \_\_\_\_\_ page 9 of this document. Since this data is publicly available, it cannot be treated as confidential.

**SEC** 1

**OTH** *Maguire*  
*RUF:kb*

Cc: Commission Clerk

DOCUMENT NUMBER-DATE

10840 OCT-7 04

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