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November 1, 2004

HAND DELIVERY

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

RECEIVED - FPSC
04 NOV - 1 PM 4:30
COMMISSION CLERK

Re: Docket No. 000061-EI - Complaint by Allied Universal Corporation and Chemical Formulators, Inc. against Tampa Electric Company for Violation of Sections 366.03, 366.06(2), and 366.07, F.S., with respect to rates offered under Commercial/Industrial Service Rider tariff; petition to examine and inspect confidential information; and request for expedited relief.

Dear Ms. Bayo:

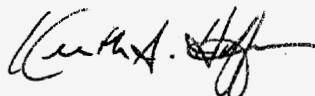
Enclosed herewith for filing on behalf of Allied Universal Corporation and Chemical Formulators, Inc. ("Allied/CFI") are the original and fifteen copies of Allied/CFI's Response to Tampa Electric Company's Request for Extension of Confidential Classification of Documents and Odyssey Manufacturing Company's Renewed Request for Confidentiality.

Please acknowledge receipt of these documents by stamping the extra copy of this letter "filed" and returning the same to me. Thank you for your assistance with this filing.

- CMP _____
- COM _____
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- RCA _____
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- SEC 1
- OTH Lockard

KAH/tls
Enclosures

Sincerely,



Kenneth A. Hoffman

RECEIVED & FILED

FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

2. To the extent that the documents listed in Attachment B contain specific proprietary confidential business information listed in Section 366.093(3)(a) and (e), Florida Statutes, such as trade secrets or information relating to competitive interests, Allied/CFI agrees with TECO and Odyssey that such documents should continue to be classified as confidential by the Commission.

3. Allied/CFI objects however, to continued confidential classification of the specific following documents included in Attachment B to Order Number 03-0532:

A. Document number 07053-01- - Rebuttal testimony of Robert N. Namoff and Exhibits RMN-15 through RMN-19. Specifically, Allied/CFI objects to the continued classification of Exhibit RMN-16 to Robert N. Namoff's testimony which includes a copy of the Contract Service Agreement ("CSA") between Tampa Electric and Odyssey; and

B. Document number 03681-01 - - Original version of CSA between TECO and Allied Universal Corp. with Exhibit B.

3. Allied/CFI also objects to the continued classification of any and all documents included in Attachment B to Order 03-0532 that contain specific information related to and arising from negotiations between TECO, Odyssey and Allied/CFI culminating in CSAs pursuant to TECO's Commission approved Commercial Industrial Service Rider Tariff ("CISR Tariff").

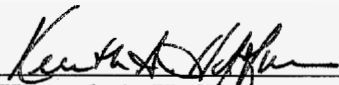
4. Order No. 03-0532 requires that a party seeking continued confidential classification for eighteen (18) months demonstrate "good cause why the period should be extended." The requests of TECO and Odyssey fail to meet that burden and should be denied with respect to the CSAs and the documents as outlined above.

4. In support of its request, TECO states only that "while Tampa Electric no longer has a CSIR (sic) tariff in place, its commitments to Allied, CFI and Odyssey continue unabated."

Allied/CFI is not aware of what commitments TECO is referring to and no explanation is provided in TECO's Request for Extension. With respect to the Allied/CFI and TECO CSA, the Commission is well aware of Allied/CFI's position that TECO did not keep its commitments to Allied/CFI resulting in a unilateral termination of that CSA by TECO to the injury and detriment of Allied/CFI and consumers of liquid chlorine bleach in general.

5. In any case, TECO's authority to offer a CISR rate has expired. As TECO concedes, its CISR tariff is no longer in place. The need to maintain confidential protection of CISR rate contracts (the CSAs) and CISR negotiation information to avoid the availability and use of such contracts by other potential CISR customers in negotiations with TECO no longer exists. There is no longer a legitimate public policy reason or any type of statutory or Commission order authority for maintaining the confidentiality of the CSAs entered into between TECO and Odyssey and between TECO and Allied/CFI or for maintaining the confidentiality of documents that contain specific information related to and arising from negotiations between TECO, Odyssey and Allied/CFI culminating in the CSAs. Accordingly, the Commission should deny TECO and Odysseys's requests for an additional eighteen (18) months of confidential protection for these two CSAs, and for the documents that contain information related to and arising from negotiations between the parties that culminated in the CSAs.

Respectfully submitted,



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and Chemical Formulators, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished by U.S. Mail, this 1st day of November, 2004, to the following:

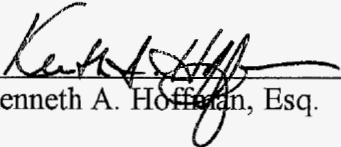
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