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ATTORNEYS AND COUNSELORS AT LAW

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October 17, 2013

HAND DELIVERED

RECEIVED-FPSC
13 OCT 17 PM 2:47
COMMISSION
CLERK

Ms. Ann Cole, Director
Division of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

REDACTED

Re: Fuel and Purchased Power Cost Recovery Clause with Generating
Performance Incentive Factor; FPSC Docket No. 130001-EI

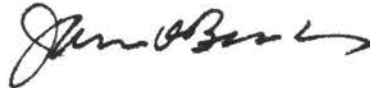
Dear Ms. Cole:

Enclosed for filing in the above docket are the original and seven (7) copies of Tampa Electric Company's Request for Confidential Classification and Motion for Temporary Protective Order regarding its answers to the Florida Public Service Commission Staff's Ninth Set of Interrogatories Nos. 50-61.

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.)

COM	
AFD	2
APA	1
ECO	1
ENG	1
GCL	1
IDM	1
TEL	
CLK	

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power)
Cost Recovery Clause and Generating)
Performance Incentive Factor.)
)
_____)

DOCKET NO. 130001-EI

FILED: October 17, 2013

**TAMPA ELECTRIC COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND MOTION FOR TEMPORARY PROTECTIVE ORDER**

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby request confidential classification of the yellow highlighted information contained in the following described document(s) ("the Document(s)") stamped "CONFIDENTIAL" and all information that is or may be printed on yellow paper stock stamped "CONFIDENTIAL" within the Document(s), all of said confidential information being hereinafter referred to as "Confidential Information."

Description of the Document(s)

Tampa Electric's answers to the Florida Public Service Commission Staff's Ninth Set of Interrogatories (Nos. 50, 55 and 56), a single copy of which is being simultaneously filed with the Commission on a confidential basis under a separate transmittal letter. Bates stamp Pages 2-6, 11, and 20 contain certain information ("Confidential Information") highlighted in yellow. In support of this request, the company states:

1. Subsection 366.093(1), Florida Statutes, provides that any records "found by the Commission to be propriety confidential business information shall be kept confidential and shall be exempt from s. 119.07(1), Florida Statutes [requiring disclosure under the Public Records

Act].” Proprietary confidential business information includes, but is not limited to “[i]nformation concerning . . . contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms.” Subsection 366.093(3)(d), Florida Statutes. Proprietary confidential business information also includes “[i]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information.” Section 366.093(3)(e), Florida Statutes. The Confidential Information that is the subject of this request and motion falls within the statutory categories and, thus, constitutes propriety confidential business information entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

2. Attached hereto as Exhibit "A" is a justification for confidential treatment of the Confidential Information contained in the Document(s).

3. Attached hereto as Exhibit "B" are two public versions of the Document(s) with the Confidential Information redacted, unless previously filed as indicated.

4. The Confidential Information contained in the Document(s) is intended to be and is treated by Tampa Electric as private and has not been publicly disclosed.

5. For the same reasons set forth herein in support of its request for confidential classification, Tampa Electric also moves the Commission for entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

Requested Duration of Confidential Classification

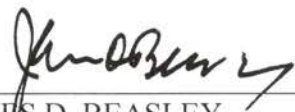
6. Tampa Electric requests that the Confidential Information be treated by the Commission as confidential proprietary business information for at least the 18 month period

prescribed in Rule 25-22.006(9)(a), Florida Administrative Code. If, and to the extent that the company is in need of confidential classification of the Confidential Information beyond the 18 month period set forth in the Commission rule, the justification and grounds for such extended confidential treatment are set forth in Exhibit "C" to this request and motion.

WHEREFORE, Tampa Electric Company respectfully requests that the Confidential Information that is the subject of this request and motion be accorded confidential classification for the reasons set forth herein and for a minimum period of 18 months, subject to any request for a longer period of confidential classification as may be set forth in Exhibit "C" to this request and motion. The company further moves for the entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

DATED this 16th day of October, 2013.

Respectfully submitted,



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(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification and Motion for Temporary Protective Order, filed on behalf of Tampa Electric Company, has been served by electronic and U. S. Mail or hand delivery(*) on this 17th day of October 2013, to the following:

Ms. Martha F. Barrera*
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White Springs, FL 32096

Ms. Cecilia Bradley
Senior Assistant Attorney General
Office of the Attorney General
The Capitol – PL01
Tallahassee, FL 32399-1050



ATTORNEY

**JUSTIFICATION FOR CONFIDENTIAL TREATMENT OF
HIGHLIGHTED PORTIONS OF TAMPA ELECTRIC'S RESPONSES TO
STAFF'S NINTH SET OF INTERROGATORIES (FILED OCTOBER 17, 2013)**

<u>Bates Stamp Page No.</u>	<u>Interrogatory No.</u>	<u>Detailed Description</u>	<u>Rationale</u>
2 - 6	50	All Yellow Highlighted Information	(1)
11	55	All Yellow Highlighted Information	(1)
20	56	All Yellow Highlighted Information	(1)

-
- (1) The information contained on the listed pages contain fixed prices of hedged natural gas transactions, percent volume of natural gas consumption hedged, mark-to-market savings or losses, all of which types of information have been recognized by the Commission on numerous occasions to constitute proprietary confidential business information, the disclosure of which would be harmful to Tampa Electric's ability to contract for goods and services on favorable terms and, likewise, the disclosure of which would be harmful to the competitive interests of Tampa Electric. See, for example, Order Nos. PSC-07-0859-CFO-EI and PSC-07-9860-CFO-EI. This specific type of information is described in Section 366.093(3)(d) and (e) as being entitled to confidential protection and exemption from the Public Records Law.

PUBLIC VERSION(S) OF THE DOCUMENT(S)

Attached hereto (unless previously filed as may be noted below) are two public versions of the Document(s) with the Confidential Information redacted.

Public Version(s) of the Document(s) attached X

Public Version(s) of the Document(s) previously filed on _____

REDACTED

REDACTED

TAMPA ELECTRIC COMPANY
DOCKET NO. 130001-EI
STAFF'S NINTH SET OF
INTERROGATORIES
INTERROGATORY NO. 50
PAGE 2 OF 6
FILED: OCTOBER 17, 2013

Transaction Date (a)	Month of Swap (b)	Fixed Price (c)	NYMEX Forward Price (d)
14-Oct-10	201208		\$ 4.998
14-Oct-10	201208		\$ 4.998
14-Oct-10	201208		\$ 4.998
25-Aug-10	201208		\$ 5.136
25-Aug-10	201208		\$ 5.136
4-May-12	201208		\$ 2.495
4-May-12	201208		\$ 2.495
17-Feb-11	201208		\$ 4.664
17-Feb-11	201208		\$ 4.664
23-Aug-11	201208		\$ 4.435
23-Aug-11	201208		\$ 4.435
23-Aug-11	201208		\$ 4.435
25-Aug-11	201208		\$ 4.412
25-Aug-11	201208		\$ 4.412
26-Aug-11	201208		\$ 4.450
26-Aug-11	201208		\$ 4.450
14-Oct-10	201209		\$ 5.020
14-Oct-10	201209		\$ 5.020
14-Oct-10	201209		\$ 5.020
27-Sep-10	201209		\$ 4.933
6-May-11	201209		\$ 4.840
27-Sep-10	201209		\$ 4.933
11-May-11	201209		\$ 4.814
11-May-11	201209		\$ 4.814
25-Aug-11	201209		\$ 4.417
26-Aug-11	201209		\$ 4.455
26-Aug-11	201209		\$ 4.455
12-Sep-11	201209		\$ 4.411
6-Oct-11	201209		\$ 4.204
6-Oct-11	201209		\$ 4.204
6-Oct-11	201209		\$ 4.204
17-Apr-12	201209		\$ 2.297
17-Apr-12	201209		\$ 2.297
6-May-11	201210		\$ 4.893
26-Oct-10	201210		\$ 4.979
26-Oct-10	201210		\$ 4.979
28-Jan-11	201210		\$ 4.924
27-Apr-11	201210		\$ 5.028
11-May-11	201210		\$ 4.867
11-May-11	201210		\$ 4.867
25-Aug-11	201210		\$ 4.444
26-Aug-11	201210		\$ 4.482
26-Aug-11	201210		\$ 4.482
6-Oct-11	201210		\$ 4.238
6-Oct-11	201210		\$ 4.238
25-Jan-12	201210		\$ 3.162

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TAMPA ELECTRIC COMPANY
DOCKET NO. 130001-EI
STAFF'S NINTH SET OF
INTERROGATORIES
INTERROGATORY NO. 50
PAGE 3 OF 6
FILED: OCTOBER 17, 2013

Transaction Date (a)	Month of Swap (b)	Fixed Price (c)	NYMEX Forward Price (d)
13-Jul-12	201210		\$ 2.894
13-Jul-12	201210		\$ 2.894
10-Feb-11	201211		\$ 4.966
6-May-11	201211		\$ 5.049
22-Nov-10	201211		\$ 5.309
11-May-11	201211		\$ 5.027
22-Aug-11	201211		\$ 4.603
26-Aug-11	201211		\$ 4.646
7-Aug-12	201211		\$ 3.150
9-Aug-12	201211		\$ 3.156
9-Aug-12	201211		\$ 3.156
21-Jun-12	201212		\$ 3.244
6-May-11	201212		\$ 5.271
9-Dec-10	201212		\$ 5.397
11-Feb-11	201212		\$ 5.154
11-May-11	201212		\$ 5.254
23-Aug-11	201212		\$ 4.885
23-Aug-11	201212		\$ 4.885
23-Aug-11	201212		\$ 4.885
25-Jun-12	201212		\$ 3.303
7-Sep-12	201212		\$ 3.079
13-Sep-12	201212		\$ 3.385
13-Sep-12	201212		\$ 3.385
6-Nov-12	201212		\$ 3.617
27-Nov-12	201212		\$ 3.769
27-Nov-12	201212		\$ 3.769
25-Oct-12	201301		\$ 3.910
9-Nov-12	201301		\$ 3.634
27-Jan-11	201301		\$ 5.411
6-May-11	201301		\$ 5.403
11-May-11	201301		\$ 5.383
26-Jan-12	201301		\$ 3.606
17-Feb-12	201301		\$ 3.743
23-Apr-12	201301		\$ 3.112
13-Jul-12	201301		\$ 3.546
13-Jul-12	201301		\$ 3.546
11-Sep-12	201301		\$ 3.450
11-Sep-12	201301		\$ 3.450
6-Nov-12	201301		\$ 3.748
4-May-12	201302		\$ 3.395
9-Nov-12	201302		\$ 3.647
9-Nov-12	201302		\$ 3.647
28-Feb-11	201302		\$ 5.346
9-May-11	201302		\$ 5.313
22-Aug-11	201302		\$ 4.969
7-Feb-12	201302		\$ 3.599

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TAMPA ELECTRIC COMPANY
DOCKET NO. 130001-EI
STAFF'S NINTH SET OF
INTERROGATORIES
INTERROGATORY NO. 50
PAGE 4 OF 6
FILED: OCTOBER 17, 2013

Transaction Date (a)	Month of Swap (b)	Fixed Price (c)	NYMEX Forward Price (d)
17-Feb-12	201302		\$ 3.752
22-Feb-12	201302		\$ 3.763
21-Mar-12	201302		\$ 3.493
7-Aug-12	201302		\$ 3.551
9-Aug-12	201302		\$ 3.570
11-Sep-12	201302		\$ 3.472
6-Nov-12	201302		\$ 3.754
6-Nov-12	201302		\$ 3.754
7-Nov-12	201302		\$ 3.720
21-Jun-12	201303		\$ 3.374
21-Jun-12	201303		\$ 3.374
14-Dec-12	201303		\$ 3.380
28-Mar-11	201303		\$ 5.441
27-Sep-11	201303		\$ 4.874
9-Nov-12	201303		\$ 3.622
9-May-11	201303		\$ 5.241
22-Feb-12	201303		\$ 3.747
20-Mar-12	201303		\$ 3.465
25-Jun-12	201303		\$ 3.436
7-Sep-12	201303		\$ 3.245
7-Sep-12	201303		\$ 3.245
6-Nov-12	201303		\$ 3.729
13-Dec-12	201303		\$ 3.407
3-Jan-13	201303		\$ 3.214
25-Oct-12	201304		\$ 3.857
25-Oct-12	201304		\$ 3.857
9-Nov-12	201304		\$ 3.611
27-Apr-11	201304		\$ 5.183
9-May-11	201304		\$ 5.026
28-Oct-11	201304		\$ 4.541
22-Feb-12	201304		\$ 3.708
21-Mar-12	201304		\$ 3.439
17-Apr-12	201304		\$ 3.149
23-Apr-12	201304		\$ 3.082
13-Jul-12	201304		\$ 3.514
13-Jul-12	201304		\$ 3.514
11-Sep-12	201304		\$ 3.459
6-Nov-12	201304		\$ 3.710
3-Jan-13	201304		\$ 3.250
4-Jan-13	201304		\$ 3.337
4-Jan-13	201304		\$ 3.337
14-Jan-13	201304		\$ 3.412
19-Mar-13	201304		\$ 3.969
6-May-11	201305		\$ 5.090
28-Nov-11	201305		\$ 4.247
4-May-12	201305		\$ 3.404

REDACTED

TAMPA ELECTRIC COMPANY
DOCKET NO. 130001-EI
STAFF'S NINTH SET OF
INTERROGATORIES
INTERROGATORY NO. 50
PAGE 5 OF 6
FILED: OCTOBER 17, 2013

Transaction Date (a)	Month of Swap (b)	Fixed Price (c)	NYMEX Forward Price (d)
9-Nov-12	201305		\$ 3.650
9-May-11	201305		\$ 5.040
17-Feb-12	201305		\$ 3.727
12-Mar-12	201305		\$ 3.357
21-Mar-12	201305		\$ 3.478
7-Aug-12	201305		\$ 3.536
9-Aug-12	201305		\$ 3.569
6-Sep-12	201305		\$ 3.344
16-Oct-12	201305		\$ 3.852
6-Nov-12	201305		\$ 3.744
4-Jan-13	201305		\$ 3.393
4-Jan-13	201305		\$ 3.393
3-Jan-13	201305		\$ 3.306
14-Jan-13	201305		\$ 3.464
21-Jun-12	201306		\$ 3.412
5-Dec-11	201306		\$ 4.266
27-Dec-11	201306		\$ 3.976
9-Nov-12	201306		\$ 3.693
27-Jun-11	201306		\$ 4.915
31-Oct-11	201306		\$ 4.601
17-Feb-12	201306		\$ 3.772
12-Mar-12	201306		\$ 3.411
21-Mar-12	201306		\$ 3.530
25-Jun-12	201306		\$ 3.475
6-Sep-12	201306		\$ 3.390
7-Sep-12	201306		\$ 3.336
11-Sep-12	201306		\$ 3.546
16-Oct-12	201306		\$ 3.891
6-Nov-12	201306		\$ 3.784
13-Dec-12	201306		\$ 3.521
4-Jan-13	201306		\$ 3.448
4-Jan-13	201306		\$ 3.448
3-Jan-13	201306		\$ 3.363
14-Jan-13	201306		\$ 3.519
9-Nov-12	201307		\$ 3.735
26-Jul-11	201307		\$ 5.028
26-Jul-11	201307		\$ 5.028
27-Jul-11	201307		\$ 5.026
25-Jan-12	201307		\$ 3.730
26-Jan-12	201307		\$ 3.629
17-Feb-12	201307		\$ 3.815
12-Mar-12	201307		\$ 3.454
21-Mar-12	201307		\$ 3.576
13-Jul-12	201307		\$ 3.620
6-Sep-12	201307		\$ 3.435
11-Sep-12	201307		\$ 3.587

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TAMPA ELECTRIC COMPANY
DOCKET NO. 130001-EI
STAFF'S NINTH SET OF
INTERROGATORIES
INTERROGATORY NO. 50
PAGE 6 OF 6
FILED: OCTOBER 17, 2013

Transaction Date (a)	Month of Swap (b)	Fixed Price (c)	NYMEX Forward Price (d)
11-Sep-12	201307		\$ 3.587
13-Sep-12	201307		\$ 3.638
16-Oct-12	201307		\$ 3.933
6-Nov-12	201307		\$ 3.827
3-Jan-13	201307		\$ 3.421
14-Jan-13	201307		\$ 3.574
14-Jan-13	201307		\$ 3.574
19-Mar-13	201307		\$ 4.074

TAMPA ELECTRIC COMPANY
 DOCKET NO. 130001-EI
 STAFF'S NINTH SET OF
 INTERROGATORIES
 INTERROGATORY NO. 55
 PAGE 1 OF 1
 FILED: OCTOBER 17, 2013

55. For the twelve months beginning August 1, 2012, and ending July 31, 2013, for each month that hedged volumes of fuel oil or natural gas were outside the percentage range for volumes to be hedged stated in TECO's risk management plan or otherwise stated in internal procedures governing TECO's hedging activities, please state the month, the extent to which the volume hedged was outside of the range, and an explanation of the cause.
- A. The requested information regarding natural gas hedges is provided in the following table. Tampa Electric did not hedge fuel oil during this period.

Tampa Electric
 Summary of Natural Gas Hedge Volumes Relative to Actual Consumption
 August 2012 - July 2013

Month-Year	Target Minimum	Target Maximum	% of Actual Consumption Hedged	Above Maximum? Below Minimum?	Explanation
Aug-12	60%	80%		No	
Sep-12	60%	80%		No	
Oct-12	60%	80%		No	
Nov-12	60%	80%		No	
Dec-12	60%	80%		Yes	Gas-fired generation lower than projected due to lower retail sales.
Jan-13	60%	80%		Yes	Gas-fired generation higher than projected due to lower than projected coal-fired generation.
Feb-13	60%	80%		Yes	Gas-fired generation higher than projected due to lower than projected coal-fired generation.
Mar-13	60%	80%		No	
Apr-13	60%	80%		No	
May-13	60%	80%		No	
Jun-13	60%	80%		No	
Jul-13	60%	80%		Yes	Gas-fired generation lower than projected due to lower retail sales and higher coal-fired generation.
12-Month Cumulative	60%	80%	68%	No	Cumulative hedge percentage is close to middle of the desired hedge range.

therefore, associated price impact from risk is minimal. Tampa Electric maintains a contract with a local supplier to deliver all of its needs, which mitigates supply risk.

3. **Natural Gas:** Tampa Electric continues to implement prudent financial hedging strategies for natural gas requirements. In ~~2012~~2013, the company used swap agreements—the exchange of a payment tied to the value of a natural gas index for a fixed payment—to hedge natural gas. In keeping with the company's approved risk management plan, Tampa Electric plans to hedge a significant percentage of its projected natural gas usage in ~~2013~~2014.

Tampa Electric uses the forward pricing information of the New York Mercantile Exchange ("NYMEX") natural gas forward price curve in developing natural gas price hedging strategy. Tampa Electric also subscribes to industry publications that provide information about underlying issues affecting the availability and price of natural gas and other commodities. The purpose of Tampa Electric's natural gas hedge plan is to reduce natural gas price volatility by utilizing financial instruments relying on three key variables: price, volume and time.

Tampa Electric projects prices during the company's annual fuel budgeting process. The volume of natural gas that the company will hedge falls between a minimum and a maximum percentage of the expected natural gas burn. The percentages vary according to the time remaining until the contract month.

Tampa Electric's approved Risk Management Plan describes the following key elements of the company's natural gas hedging strategy: (1) natural gas prices can be hedged up to 24 months into the future; (2) nearer months can be hedged for a greater percentage of the expected volume than outer months; and (3) natural gas options can be used for financial hedging.

Currently, Tampa Electric estimates ~~over~~ about [REDACTED] percent of its total ~~2012~~2013 natural gas purchases will be covered by financial hedges. The net effect of these hedges is estimated to be a [REDACTED] of approximately [REDACTED]. For ~~2013~~2014, Tampa Electric has approximately [REDACTED] percent hedged with a currently estimated [REDACTED] of [REDACTED].

4. **Purchased Power:** Total forecasted purchased power for ~~2012~~2014 is ~~4,192,713~~ GWH. As of July ~~2012~~2013, Tampa Electric has physically hedged ~~823,28~~ GWH's of its ~~2013~~2014 expected purchased power needs through pre-scheduled purchased power

REDACTED

TAMPA ELECTRIC COMPANY
DOCKET NO. 130001-EI
STAFF'S NINTH SET OF
INTERROGATORIES
INTERROGATORY NO. 50
PAGE 2 OF 6
FILED: OCTOBER 17, 2013

Transaction Date (a)	Month of Swap (b)	Fixed Price (c)	NYMEX Forward Price (d)
14-Oct-10	201208		\$ 4.998
14-Oct-10	201208		\$ 4.998
14-Oct-10	201208		\$ 4.998
25-Aug-10	201208		\$ 5.136
25-Aug-10	201208		\$ 5.136
4-May-12	201208		\$ 2.495
4-May-12	201208		\$ 2.495
17-Feb-11	201208		\$ 4.664
17-Feb-11	201208		\$ 4.664
23-Aug-11	201208		\$ 4.435
23-Aug-11	201208		\$ 4.435
23-Aug-11	201208		\$ 4.435
25-Aug-11	201208		\$ 4.412
25-Aug-11	201208		\$ 4.412
26-Aug-11	201208		\$ 4.450
26-Aug-11	201208		\$ 4.450
14-Oct-10	201209		\$ 5.020
14-Oct-10	201209		\$ 5.020
14-Oct-10	201209		\$ 5.020
27-Sep-10	201209		\$ 4.933
6-May-11	201209		\$ 4.840
27-Sep-10	201209		\$ 4.933
11-May-11	201209		\$ 4.814
11-May-11	201209		\$ 4.814
25-Aug-11	201209		\$ 4.417
26-Aug-11	201209		\$ 4.455
26-Aug-11	201209		\$ 4.455
12-Sep-11	201209		\$ 4.411
6-Oct-11	201209		\$ 4.204
6-Oct-11	201209		\$ 4.204
6-Oct-11	201209		\$ 4.204
17-Apr-12	201209		\$ 2.297
17-Apr-12	201209		\$ 2.297
6-May-11	201210		\$ 4.893
26-Oct-10	201210		\$ 4.979
26-Oct-10	201210		\$ 4.979
28-Jan-11	201210		\$ 4.924
27-Apr-11	201210		\$ 5.028
11-May-11	201210		\$ 4.867
11-May-11	201210		\$ 4.867
25-Aug-11	201210		\$ 4.444
26-Aug-11	201210		\$ 4.482
26-Aug-11	201210		\$ 4.482
6-Oct-11	201210		\$ 4.238
6-Oct-11	201210		\$ 4.238
25-Jan-12	201210		\$ 3.162

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Transaction Date (a)	Month of Swap (b)	Fixed Price (c)	NYMEX Forward Price (d)
13-Jul-12	201210		\$ 2.894
13-Jul-12	201210		\$ 2.894
10-Feb-11	201211		\$ 4.966
6-May-11	201211		\$ 5.049
22-Nov-10	201211		\$ 5.309
11-May-11	201211		\$ 5.027
22-Aug-11	201211		\$ 4.603
26-Aug-11	201211		\$ 4.646
7-Aug-12	201211		\$ 3.150
9-Aug-12	201211		\$ 3.156
9-Aug-12	201211		\$ 3.156
21-Jun-12	201212		\$ 3.244
6-May-11	201212		\$ 5.271
9-Dec-10	201212		\$ 5.397
11-Feb-11	201212		\$ 5.154
11-May-11	201212		\$ 5.254
23-Aug-11	201212		\$ 4.885
23-Aug-11	201212		\$ 4.885
23-Aug-11	201212		\$ 4.885
25-Jun-12	201212		\$ 3.303
7-Sep-12	201212		\$ 3.079
13-Sep-12	201212		\$ 3.385
13-Sep-12	201212		\$ 3.385
6-Nov-12	201212		\$ 3.617
27-Nov-12	201212		\$ 3.769
27-Nov-12	201212		\$ 3.769
25-Oct-12	201301		\$ 3.910
9-Nov-12	201301		\$ 3.634
27-Jan-11	201301		\$ 5.411
6-May-11	201301		\$ 5.403
11-May-11	201301		\$ 5.383
26-Jan-12	201301		\$ 3.606
17-Feb-12	201301		\$ 3.743
23-Apr-12	201301		\$ 3.112
13-Jul-12	201301		\$ 3.546
13-Jul-12	201301		\$ 3.546
11-Sep-12	201301		\$ 3.450
11-Sep-12	201301		\$ 3.450
6-Nov-12	201301		\$ 3.748
4-May-12	201302		\$ 3.395
9-Nov-12	201302		\$ 3.647
9-Nov-12	201302		\$ 3.647
28-Feb-11	201302		\$ 5.346
9-May-11	201302		\$ 5.313
22-Aug-11	201302		\$ 4.969
7-Feb-12	201302		\$ 3.599

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Transaction Date (a)	Month of Swap (b)	Fixed Price (c)	NYMEX Forward Price (d)
17-Feb-12	201302		\$ 3.752
22-Feb-12	201302		\$ 3.763
21-Mar-12	201302		\$ 3.493
7-Aug-12	201302		\$ 3.551
9-Aug-12	201302		\$ 3.570
11-Sep-12	201302		\$ 3.472
6-Nov-12	201302		\$ 3.754
6-Nov-12	201302		\$ 3.754
7-Nov-12	201302		\$ 3.720
21-Jun-12	201303		\$ 3.374
21-Jun-12	201303		\$ 3.374
14-Dec-12	201303		\$ 3.380
28-Mar-11	201303		\$ 5.441
27-Sep-11	201303		\$ 4.874
9-Nov-12	201303		\$ 3.622
9-May-11	201303		\$ 5.241
22-Feb-12	201303		\$ 3.747
20-Mar-12	201303		\$ 3.465
25-Jun-12	201303		\$ 3.436
7-Sep-12	201303		\$ 3.245
7-Sep-12	201303		\$ 3.245
6-Nov-12	201303		\$ 3.729
13-Dec-12	201303		\$ 3.407
3-Jan-13	201303		\$ 3.214
25-Oct-12	201304		\$ 3.857
25-Oct-12	201304		\$ 3.857
9-Nov-12	201304		\$ 3.611
27-Apr-11	201304		\$ 5.183
9-May-11	201304		\$ 5.026
28-Oct-11	201304		\$ 4.541
22-Feb-12	201304		\$ 3.708
21-Mar-12	201304		\$ 3.439
17-Apr-12	201304		\$ 3.149
23-Apr-12	201304		\$ 3.082
13-Jul-12	201304		\$ 3.514
13-Jul-12	201304		\$ 3.514
11-Sep-12	201304		\$ 3.459
6-Nov-12	201304		\$ 3.710
3-Jan-13	201304		\$ 3.250
4-Jan-13	201304		\$ 3.337
4-Jan-13	201304		\$ 3.337
14-Jan-13	201304		\$ 3.412
19-Mar-13	201304		\$ 3.969
6-May-11	201305		\$ 5.090
28-Nov-11	201305		\$ 4.247
4-May-12	201305		\$ 3.404

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Transaction Date (a)	Month of Swap (b)	Fixed Price (c)	NYMEX Forward Price (d)
9-Nov-12	201305		\$ 3.650
9-May-11	201305		\$ 5.040
17-Feb-12	201305		\$ 3.727
12-Mar-12	201305		\$ 3.357
21-Mar-12	201305		\$ 3.478
7-Aug-12	201305		\$ 3.536
9-Aug-12	201305		\$ 3.569
6-Sep-12	201305		\$ 3.344
16-Oct-12	201305		\$ 3.852
6-Nov-12	201305		\$ 3.744
4-Jan-13	201305		\$ 3.393
4-Jan-13	201305		\$ 3.393
3-Jan-13	201305		\$ 3.306
14-Jan-13	201305		\$ 3.464
21-Jun-12	201306		\$ 3.412
5-Dec-11	201306		\$ 4.266
27-Dec-11	201306		\$ 3.976
9-Nov-12	201306		\$ 3.693
27-Jun-11	201306		\$ 4.915
31-Oct-11	201306		\$ 4.601
17-Feb-12	201306		\$ 3.772
12-Mar-12	201306		\$ 3.411
21-Mar-12	201306		\$ 3.530
25-Jun-12	201306		\$ 3.475
6-Sep-12	201306		\$ 3.390
7-Sep-12	201306		\$ 3.336
11-Sep-12	201306		\$ 3.546
16-Oct-12	201306		\$ 3.891
6-Nov-12	201306		\$ 3.784
13-Dec-12	201306		\$ 3.521
4-Jan-13	201306		\$ 3.448
4-Jan-13	201306		\$ 3.448
3-Jan-13	201306		\$ 3.363
14-Jan-13	201306		\$ 3.519
9-Nov-12	201307		\$ 3.735
26-Jul-11	201307		\$ 5.028
26-Jul-11	201307		\$ 5.028
27-Jul-11	201307		\$ 5.026
25-Jan-12	201307		\$ 3.730
26-Jan-12	201307		\$ 3.629
17-Feb-12	201307		\$ 3.815
12-Mar-12	201307		\$ 3.454
21-Mar-12	201307		\$ 3.576
13-Jul-12	201307		\$ 3.620
6-Sep-12	201307		\$ 3.435
11-Sep-12	201307		\$ 3.587

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Transaction Date (a)	Month of Swap (b)	Fixed Price (c)	NYMEX Forward Price (d)
11-Sep-12	201307		\$ 3.587
13-Sep-12	201307		\$ 3.638
16-Oct-12	201307		\$ 3.933
6-Nov-12	201307		\$ 3.827
3-Jan-13	201307		\$ 3.421
14-Jan-13	201307		\$ 3.574
14-Jan-13	201307		\$ 3.574
19-Mar-13	201307		\$ 4.074

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55. For the twelve months beginning August 1, 2012, and ending July 31, 2013, for each month that hedged volumes of fuel oil or natural gas were outside the percentage range for volumes to be hedged stated in TECO's risk management plan or otherwise stated in internal procedures governing TECO's hedging activities, please state the month, the extent to which the volume hedged was outside of the range, and an explanation of the cause.

A. The requested information regarding natural gas hedges is provided in the following table. Tampa Electric did not hedge fuel oil during this period.

Tampa Electric
 Summary of Natural Gas Hedge Volumes Relative to Actual Consumption
 August 2012 - July 2013

Month-Year	Target Minimum	Target Maximum	% of Actual Consumption Hedged	Above Maximum? Below Minimum?	Explanation
Aug-12	60%	80%		No	
Sep-12	60%	80%		No	
Oct-12	60%	80%		No	
Nov-12	60%	80%		No	
Dec-12	60%	80%		Yes	Gas-fired generation lower than projected due to lower retail sales.
Jan-13	60%	80%		Yes	Gas-fired generation higher than projected due to lower than projected coal-fired generation.
Feb-13	60%	80%		Yes	Gas-fired generation higher than projected due to lower than projected coal-fired generation.
Mar-13	60%	80%		No	
Apr-13	60%	80%		No	
May-13	60%	80%		No	
Jun-13	60%	80%		No	
Jul-13	60%	80%		Yes	Gas-fired generation lower than projected due to lower retail sales and higher coal-fired generation.
12-Month Cumulative	60%	80%	68%	No	Cumulative hedge percentage is close to middle of the desired hedge range.

therefore, associated price impact from risk is minimal. Tampa Electric maintains a contract with a local supplier to deliver all of its needs, which mitigates supply risk.

3. **Natural Gas:** Tampa Electric continues to implement prudent financial hedging strategies for natural gas requirements. In ~~2012~~2013, the company used swap agreements—the exchange of a payment tied to the value of a natural gas index for a fixed payment—to hedge natural gas. In keeping with the company's approved risk management plan, Tampa Electric plans to hedge a significant percentage of its projected natural gas usage in ~~2013~~2014.

Tampa Electric uses the forward pricing information of the New York Mercantile Exchange ("NYMEX") natural gas forward price curve in developing natural gas price hedging strategy. Tampa Electric also subscribes to industry publications that provide information about underlying issues affecting the availability and price of natural gas and other commodities. The purpose of Tampa Electric's natural gas hedge plan is to reduce natural gas price volatility by utilizing financial instruments relying on three key variables: price, volume and time.

Tampa Electric projects prices during the company's annual fuel budgeting process. The volume of natural gas that the company will hedge falls between a minimum and a maximum percentage of the expected natural gas burn. The percentages vary according to the time remaining until the contract month.

Tampa Electric's approved Risk Management Plan describes the following key elements of the company's natural gas hedging strategy: (1) natural gas prices can be hedged up to 24 months into the future; (2) nearer months can be hedged for a greater percentage of the expected volume than outer months; and (3) natural gas options can be used for financial hedging.

Currently, Tampa Electric estimates ~~over~~ about [REDACTED] percent of its total ~~2012~~2013 natural gas purchases will be covered by financial hedges. The net effect of these hedges is estimated to be a [REDACTED] of approximately [REDACTED]. For ~~2013~~2014, Tampa Electric has approximately [REDACTED] percent hedged with a currently estimated [REDACTED] of [REDACTED].

4. **Purchased Power:** Total forecasted purchased power for ~~2012~~2014 is 4,192,713 GWH. As of July ~~2012~~2013, Tampa Electric has physically hedged 823,28 GWH's of its ~~2013~~2014 expected purchased power needs through pre-scheduled purchased power

REQUESTED DURATION OF CONFIDENTIAL CLASSIFICATION

Tampa Electric requests that the Confidential Information that is the subject of this request be treated as proprietary confidential business information exempt from the Public Records Law for a minimum of 18 months from the date of the order granting such classification. To the extent the company needs confidential protection of the Confidential Information for a period longer than 18 months, the company's justification therefor is set forth below:

n/a