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February 23, 2015

HAND DELIVERED

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RECEIVED FPSC
15 FEB 23 AM 11:08
COMMISSION
CLERK

Re: Petition for Rate Increase by Tampa Electric Company
FPSC Docket No. 130040-EI

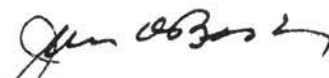
Dear Ms. Stauffer:

Enclosed for filing in the above docket are the original and seven (7) copies of Tampa Electric Company's First Request for Extension of Confidential Classification and Motion for Temporary Protective Order regarding Staff's audit workpapers pursuant to Audit Control No. 13-105-2-1.

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.)
Hyma Vedula (w/enc.)

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase)
by Tampa Electric Company.)
_____)

DOCKET NO. 130040-EI

FILED: February 23, 2015

**TAMPA ELECTRIC COMPANY'S FIRST REQUEST
FOR EXTENSION OF 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 requests an 18-month extension of the confidential classification of certain information supplied in connection with the company's 2013 base rate proceeding and, as grounds therefor, says:

1. On July 22, 2013 Tampa Electric filed a Request for Confidential Classification and Motion for Temporary Protective Order seeking confidential protection of certain documents selected as audit workpapers pursuant to Audit Control No. 13-105-2-1. By Order No. PSC-13-0358-CFO-EI issued August 6, 2014 the Commission granted Tampa Electric's July 22, 2013 request.

2. Tampa Electric adopts and incorporates by reference the July 22, 2013 request.

3. Tampa Electric is in need of continuing confidential treatment of certain of the Bates stamp pages that accompanied the July 22, 2013 request. Attached hereto is Exhibit "A" of that request identifying by yellow highlighting the Bates stamp page numbers that accompanied the original request for which Tampa Electric seeks an additional 18 months of confidential protection.

4. Each of the justifications numbers (1), (4) and (5) still apply with respect to the highlighted Bates stamp pages.

5. The highlighted Bates stamp pages in Exhibit "A" continue to be proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes, are intended to be and have been treated by Tampa Electric as private. The confidentiality of the yellow highlighted pages has been maintained and public disclosure of the highlighted pages would cause harm to Tampa Electric and its customers.


6. Nothing has changed since the company's July 22, 2013 filing to render the confidential information stale, such that continued confidential treatment would not be appropriate.

7. Upon a finding by the Commission that the confidential information remains proprietary and confidential business information, the information should not be declassified for at least an additional 18-month period and should be returned to Tampa Electric as soon as it is no longer necessary for the Commission to conduct its business. *See*, Section 366.093(4), Florida Statutes.

WHEREFORE, for the above and foregoing reasons, Tampa Electric respectfully requests that its First Request for Extension of Confidential Classification be granted.

DATED this 23rd day of February 2015.

Respectfully submitted,



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Ausley & McMullen
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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing First Request for Extension of Confidential Classification and Motion for Temporary Protective Order, filed on behalf of Tampa Electric Company, has been served by hand delivery (*) or electronic mail on this 23rd day of February, 2015 to the following:

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ATTORNEY

**JUSTIFICATION FOR CONFIDENTIAL TREATMENT OF
HIGHLIGHTED PORTIONS OF TAMPA ELECTRIC'S DOCUMENTS SELECTED
AS AUDIT WORK PAPERS PURSUANT TO AUDIT CONTROL NO. 13-105-2-1**

<u>Work Paper</u>	<u>Bates Stamp</u> <u>Page No.</u>	<u>Detailed Description</u>	<u>Rationale</u>
Audit Request TEC-06-12(REV), Request No.1, 8-3 P1-P3	1-3	All information on page	(1)
9 P1- P3	4-6	All information on page	(2)
Audit Request TEC-15-12, Request No. 1 9-4	7	All information on page	(2)
Audit Request TEC-28-12, Request Nos.1-2, 39-1 P1-P2	8-9	All information on page	(3)
Audit Request TEC-38-12, Request No. 1, 43-35/1-3	10	All information on page	(4)
43-35/1-4 P1-P4	11-14	All information on page	(4)
43-35/1-5	15	All information on page	(4)
Audit Request TEC-29-12, Request No.3, 43-35/1-6 P1-P2	16-17	All information on page	(4)
Audit Request TEC-38-12, Request No. 1, 43-46/3 P5-P6	32-33	All Highlighted Information	(5)
Audit Request TEC-38-12, Request No. 1, 43-46/4 P9-P10	47-48	All Highlighted Information	(5)

- (1) The information in question consists of Board of Director meeting minutes and summary of meeting minutes. This information is entitled to confidential protection because it contains sensitive and strategic information not made public, the disclosure of which could harm the competitive interests of Tampa Electric and possibly trigger Securities and Exchange Commission reporting obligations. As such this information is protected under 366.093(3)(e), Florida Statutes
- (2) The information in question consists of third party consultant work product, to-wit, PriceWaterhouseCoopers work papers. Public disclosure of this information would harm the competitive interests of PriceWaterhouseCoopers by disclosing their audit procedures, techniques and methodologies. While the results of their audits are summarized in annual reports, the details of the work papers are not and PriceWaterhouseCoopers has made clear that public disclosure of this information would

harm its competitive interests. At the outset of the Staff audit in this proceeding PriceWaterhouseCoopers informed the Commission that its audit work papers contained trade secrets and confidential commercial and financial information of both PriceWaterhouseCoopers and the audited companies that is privileged and confidential and expressly reserved all rights with respect to disclosure to third parties. As such, the information in question is entitled to confidential treatment pursuant to Section 366.093(e), Florida Statutes.

- (3) The financial information in question consists of projected information about the capital structure of the affiliated and consolidated companies. If publicly disclosed, this information would harm the competitive interests of the provider of the information and would trigger Securities and Exchange Commission reporting obligations. As such, the information is protected under Section 366.093 (3)(e), Florida Statutes.
- (4) This information is proprietary third party, privately negotiated and proprietary contractual information regarding TECO Plaza lease payments. Public disclosure of this information would harm the competitive interests of the owners of TECO Plaza and impair their competitive business. It would also have an adverse effect on Tampa Electric's ability to renegotiate these payments in the future. As such the information in question is entitled to confidential treatment under Section 366.093(3)(d) and (e), Florida Statutes.
- (5) The documents in question are Tampa Electric's service agreement contracts governing the operation of its generating units. The information in question concerns contractual data, the disclosure of which would impair Tampa Electric's future efforts to contract for goods and services on favorable terms. The information is also considered confidential by the other party to the contract, as it could potentially affect its future ability to negotiate and contract with other companies on favorable terms. As such, the information in question is entitled to confidential treatment pursuant to Section 366.093(3)(d) and (e), Florida Statutes.