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December 16, 2016

VIA: ELECTRONIC FILING

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

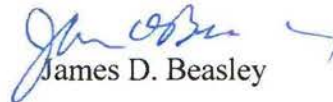
Re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance
Incentive Factor; FPSC Docket No. 160001-EI

Dear Ms. Stauffer:

Attached for filing in the above docket is Tampa Electric Company's Second Request for Extension of Confidential Classification and Motion for Temporary Protective Order in connection with the company's audit work papers pursuant to Audit Control No. 13-102-2-2.

Thank you for your assistance in connection with this matter.

Sincerely,


James D. Beasley

JDB/pp
Attachment

cc: All parties of record (w/attachment)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost)
recovery clause with generating)
performance incentive factor.)
_____)

DOCKET NO. 160001-EI

FILED: December 16, 2016

**TAMPA ELECTRIC COMPANY'S SECOND 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 audit work papers pursuant to Audit Control No. 13-102-2-2 and, as grounds therefor, says:

1. On October 14, 2013 Tampa Electric filed a Request for Confidential Classification and Motion for Temporary Protective Order seeking confidential protection of certain documents selected as audit work papers pursuant to Audit Control No. 13-102-2-2. By Order No. PSC-13-0633-CFO-EI issued November 27, 2013, the Commission granted Tampa Electric's October 14, 2013 request.

2. Tampa Electric adopts and incorporates by reference the October 14, 2013 request.

3. On July 2, 2015 the Commission granted Tampa Electric Company's First Request for Extension of Confidential Classification and Motion for Temporary Protective Order of the above-referenced documents. *See*, Order No. PSC-15-0264-CFO-EI issued July 2, 2015 in Docket No. 150001-EI.

4. Tampa Electric is in need of continuing confidential treatment of certain of the pages that accompanied the original October 14, 2013 request. Attached hereto is Exhibit "A" of that request identifying by yellow highlighting the work papers page numbers that accompanied the original request for which Tampa Electric seeks an additional 18 months of confidential protection, and is incorporated herein by reference.

5. Each of the justifications numbers (1), (2) and (3) set forth in that Exhibit "A" still applies with respect to the highlighted Work Papers pages.

6. The highlighted work paper pages in Exhibit "A" to the company's October 14, 2013 request 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.

7. Nothing has changed since the company's October 14, 2013 filing to render the confidential information stale, such that continued confidential treatment would not be appropriate.

8. 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 Second Request for Extension of Confidential Classification and Motion for Protective Order be granted.

DATED this 16th day of December 2016.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Second Request for Extension of Confidential Classification and Motion for Temporary Protective Order, filed on behalf of Tampa Electric Company, has been served by electronic mail on this 16th day of December 2016 to the following:

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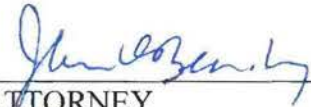
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ATTORNEY

**JUSTIFICATIONS FOR CONFIDENTIAL
TREATMENT OF HIGHLIGHTED PORTIONS OF
TAMPA ELECTRIC'S DOCUMENTS SELECTED AS AUDIT
WORK PAPERS PURSUANT TO AUDIT CONTROL NO. 13-102-2-2**

<u>Work Papers:</u>	<u>Detailed Description</u>	<u>No. of Pages</u>	<u>Rationale</u>
2	Highlighted Information	2	(1)
44-1, page 1 of 27	All Information on Page	1	(1)
44-1, page 2 of 27	All Information on Page	1	(1)
44-1, page 3 of 27	Highlighted Information	1	(1)
44-1, page 4 of 27	All Information on Page	1	(1)
44-1, page 5 of 27	All Information on Page	1	(1)
44-1, page 6 of 27	Highlighted Information	1	(1)
44-1, page 7 of 27	All Information on Page	1	(1)
44-1, page 8 of 27	All Information on Page	1	(1)
44-1, page 9 of 27	Highlighted Information	1	(1)
44-1, page 10 of 27	All Information on Page	1	(1)
44-1, page 11 of 27	Highlighted Information	1	(1)
44-1, page 12 of 27	All Information on Page	1	(1)
44-1, page 13 of 27	All Information on Page	1	(1)
44-1, page 14 of 27	Highlighted Information	1	(1)
44-1, page 15 of 27	All Information on Page	1	(1)
44-1, page 16 of 27	Highlighted Information	1	(1)
44-1, page 17 of 27	All Information on Page	1	(1)
44-1, page 18 of 27	Highlighted Information	1	(1)
44-1, page 19 of 27	All Information on Page	1	(1)
44-1, page 20 of 27	All Information on Page	1	(1)
44-1, page 21 of 27	Highlighted Information	1	(1)
44-1, page 22 of 27	All Information on Page	1	(1)
44-1, page 23 of 27	All Information on Page	1	(1)
44-1, page 24 of 27	Highlighted Information	1	(1)
44-1, page 25 of 27	All Information on Page	1	(1)
44-1, page 26 of 27	All Information on Page	1	(1)
44-1, page 27 of 27	Highlighted Information	1	(1)
44-2, page 1 of 8	Highlighted Information	1	(1)
44-2, page 2 of 8	All Information on Page	1	(1)
44-2, page 3 of 8	All Information on Page	1	(1)
44-2, page 4 of 8	Highlighted Information	1	(1)
44-2, page 5 of 8	All Information on Page	1	(1)
44-2, page 6 of 8	Highlighted Information	1	(1)
44-2, page 7 of 8	All Information on Page	1	(1)
44-2, page 8 of 8	All Information on Page	1	(1)
44-4	All Information on Page	18	(2)
44-5	All Information on Page	21	(2)

<u>Work Papers:</u>	<u>Detailed Description</u>	<u>No. of Pages</u>	<u>Rationale</u>
44-7, page 2 of 3	Highlighted Information	1	(1)
44-7, page 3 of 3	Highlighted Information	1	(1)
44-8, page 2 of 3	Highlighted Information	1	(1)
44-8, page 3 of 3	Highlighted Information	1	(1)
44-9, page 2 of 6	Highlighted Information	1	(1)
44-9, page 5 of 6	Highlighted Information	1	(1)
47-2	All Information on Page	1	(3)
47-4	All Information on Page	1	(3)
47-5	Highlighted Information	1	(3)
57	Highlighted Information	1	(1)
57-8	Highlighted Information	1	(1)

- (1) The highlighted information contains specific details about fuel hedging volume, pricing, percentages and/or counterparties. This type of information about a commodity has been recognized by the Commission on numerous occasions to constitute proprietary confidential business information. 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 paid by Tampa Electric's customers as well as the price paid by the company to hedge the customers' price of fuel. This is the specific type of information described in Section 366.093(3)(d) and (e) as being entitled to confidential protection and exemption from the Public Records Law.
- (2) The information contained on the listed pages includes Tampa Electric's extended credit limits for trading companies. The disclosure of the counterparties and credit terms could cause other trading entities to modify existing or potential future terms of any agreements. As such, public disclosure of the information would adversely affect the competitive interests of Tampa Electric and its ability to contract for goods and services on favorable terms. The disclosure of this information would therefore be harmful to competitive interests, and as such, the information is entitled to confidential treatment pursuant to Section 366.093(d) and (e), Florida Statutes.
- (3) The confidential Information shows estimated purchase amounts pursuant to confidential contracts as negotiated by and between Tampa Electric Company and certain energy providers. As such, the information in question is information concerning bids or other contractual data the disclosure of which would impair the efforts of Tampa Electric to contract for goods and services on favorable terms. It is also information relating to competitive interests, the disclosure of which would impair the competitive business of Tampa Electric. The Confidential Information falls within the above statutory categories and, thus, constitutes proprietary confidential business information entitled to protection under Section 366.093 and Rule 25-22.06.