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February 11, 2019

VIA: ELECTRONIC FILING

Mr. Adam J. Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

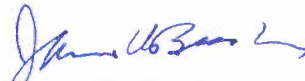
Re: Petition for recovery of costs associated with named tropical systems during the 2015, 2016 and 2017 hurricane seasons and replenishment of storm reserve subject to final true-up, by Tampa Electric Company
FPSC Docket No. 20170271-EI

Dear Mr. Teitzman:

Attached for filing in the above docket is Tampa Electric Company's Motion for a Temporary Protective Order.

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: Petition of Tampa Electric Company)
for Recovery of Costs Associated with)
Named Tropical Systems and)
Replenishment of Storm Reserve)
_____)

DOCKET NO. 20170271-EI

FILED: February 11, 2019

**TAMPA ELECTRIC COMPANY'S MOTION
FOR A TEMPORARY PROTECTIVE ORDER**

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Rule 25.22.006(6)(c), Florida Administrative Code, hereby moves the Commission for entry of a temporary protective order exempting from Section 119.07(1), Florida Statutes, certain information requested by the Office of Public Counsel ("OPC") through discovery, and for the protection of that information against public disclosure pending OPC's review of it. In support of its Motion, the company says:

1. On this date Tampa Electric Company is providing the Office of Public Counsel Late Filed Deposition Exhibits (shown with Late Filed Exhibit Numbers) and Excel spreadsheets (identified with italicized titles) contained on a single confidential CD and listed in the Index to Late Filed Deposition Exhibits attached hereto as Exhibit "A" and made a part hereof. Tampa Electric considers all of the information contained on this CD to constitute proprietary confidential business information which is entitled to protection against public disclosure pursuant to Section 366.093, Florida Statutes, in that they contain, among other things:

(d) disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms.

(e) information relating to competitive interests, the disclosure of which would impair the competitive business of the

provider of the information. (Section 366.093(3)(d) and (e), Florida Statutes)

2. Public disclosure of the information in question would adversely affect the economic interests of Tampa Electric and its customers.

3. Rule 25-22.006, Florida Administrative Code, provides for protection of this type of information when a utility allows Public Counsel to inspect or take possession of such information in the course of discovery. Subsection (6)(c) of this rule states:

(c) When a utility or other person agrees to allow Public Counsel to inspect or take possession of utility information for the purpose of determining what information is to be used in a proceeding before the Commission, the utility may request a temporary protective order exempting the information from Section 119.07(1), F.S. If the information is to be used in a proceeding before the Commission, then the utility must file a specific request for a protective order under paragraph (a) above. If the information is not to be used in a proceeding before the Commission, then Public Counsel shall return the information to the utility in accordance with the record retention requirements of the Department of State.

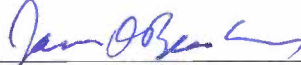
4. Tampa Electric requests a temporary protective order in order to allow OPC access to the information in question and at the same time protect the economic interests of Tampa Electric and its customers from the harm that would result from public disclosure of the above-referenced confidential information.

5. Tampa Electric is prepared to furnish OPC access to the information in question. The company maintains the information in question is in a confidential form and has not disclosed it publicly.

WHEREFORE, Tampa Electric moves the Commission for entry of a Temporary Protective Order allowing it to provide OPC the confidential information contained in the above-referenced single confidential CD while maintaining the confidential nature of that information.

DATED this 11th day of February 2019.

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 Motion for Temporary Protective Order, filed on behalf of Tampa Electric Company, has been served by electronic mail on this 11th day of February, 2019 to the following:

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TAMPA ELECTRIC COMPANY
DOCKET NO. 20170271-EI
INDEX TO LATE FILED DEPOSITION EXHIBITS
WITNESS: CALDWELL

<u>Late Filed Exhibit</u>	<u>Subject / Title</u>	<u>Bates Stamped Pages</u>
No. 4	Mutual Assistance Agreements	1 - 94
No. 30	AEP Hotel Receipt Reconciliation	95 – 818
	<i>(BS_819) AEP Storm Cost Reconciliation_Final.xlsx</i>	819
No. 32	AEP Final Time Sheets	820
No. 35	Con Ed Time Reports	821 -1050
	<i>(BS_1051) Consolidated Edison Storm Cost Reconciliation_Final.xlsx</i>	1051
No. 37	Reconciliation of Documents (520, 120, 81, 121, 143).	1052 – 1053
No. 61	Emera Affiliate Services Agreements	1054 – 1128
No. 74	Verification Chatman Kent Hydro DBA Entegrus	1129 - 1227
	<i>(BS_1228) Entegrus_Storm Cost Reconciliation_Final.xlsx</i>	1228
	Verification Emera Utility Services	1229 – 1874
	<i>(BS_1875) Emera Utility Services Storm Cost Reconciliation_Final.xlsx</i>	1875

	Verification Nova Scotia Power	1876-2279
	<i>(BS_2280) EMERA Nova Scotia_Storm Cost Reconciliation_Final.xlsm</i>	2280
	Verification Toronto Hydro Electric System Limited	2281 – 2566
	<i>(BS_2567)Toronto Hydro _ Storm Cost Reconciliation_Final.xlsm</i>	2567
No. 75	Detail for NS Power and Emera Utility Services	2568
No. 78	Exhibit 77 Company Identification	2569
No. 79	Empire Work With FPL	2570
No. 89	Orange and Rockland Time Sheet/Labor Reconciliation.	2571 – 2673
	<i>(BS_2674) Orange Rockland Storm Cost Reconciliation_Final.xlsm</i>	2674