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July 23, 2021

VIA HAND DELIVERY

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

REDACTED

Re: Docket 20210034-EI, Petition for Rate Increase by Tampa Electric Company

Dear Mr. Teitzman:

Enclosed for filing in the above docket is Tampa Electric Company's Request for Confidential Classification re Staff's Informal Request for Supplemental Discovery dated July 15, 2021, along with the accompanying versions of the redacted document.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning to the runner delivering same today.

Thank you for your assistance in connection with this matter.

Sincerely,



Malcolm N. Means

MNM/ne
Enclosure
cc: All Parties of Record

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2021 JUL 23 PM 2:35
COMMISSION
CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Tampa Electric Company)
for an increase in its base rates and service)
charges and other relief)
_____)

DOCKET NO. 20210034-EI

FILED: July 23, 2021

**TAMPA ELECTRIC COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION**

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 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)

On May 13, 2021, the Office of Public Counsel ("OPC") served Tampa Electric with its Second Request for Production of Documents (Nos. 19-33). Tampa Electric served its responses and documents responsive to that request to OPC on June 7, 2021.¹ Tampa Electric also filed a Motion for Temporary Protective Order for certain documents included in that production on June 7, 2021.² On July 15, 2021, Commission Staff informally requested copies of the documents produced in response to OPC's Second Request for Production No. 33. As a result, Tampa Electric hereby files the document entitled "(BS 91-95) POD_33 (Confidential)_bates.pdf with the Commission Clerk and seeks confidential treatment for this document so that Commission Staff

¹ See Document No. 04576-2021, filed June 7, 2021 in Docket No. 20210034-EI.

² See Document No. 04570-2021, filed June 7, 2021 in Docket No. 20210034-EI.

may review it. The information for which confidential treatment is requested is highlighted in yellow in the versions of the files included with this request. 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 proprietary 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: (a) trade secrets; (b) internal auditing controls and reports of internal auditors; (c) security measures, systems, or procedures; (d) information concerning bids or other 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; (e) information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information; and (f) employee personnel information unrelated to compensation, duties, qualifications, or responsibilities. §366.093(3)(a)-(f), Fla. Stat. The Confidential Information that is the subject of this request and motion falls within one or more of these statutory categories and, thus, constitutes proprietary 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 Documents.

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

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

5. This document is subject to a Motion for Temporary Protective Order filed with the Commission in this docket pursuant to Rule 25-22.006(6)(a) of the Florida Administrative Code. See Document No. 04570-2021, filed June 7, 2021 in Docket No. 20210034-EL.

Requested Duration of Confidential Classification

6. Pursuant to Rule 25-22.006(9)(a), Tampa Electric requests that the Confidential Information be treated by the Commission as confidential proprietary business information for 18 months. 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 18 months.

DATED this 23rd day of July, 2021.

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, filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 23rd day of July, 2021 to the following:

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Malcolm N. Means

ATTORNEY

JUSTIFICATION FOR CONFIDENTIAL TREATMENT

Discovery Request	MTPO?	Document	Pages	Rationale
OPC's 2 nd PODs No. 33	Doc. No. 04570-2021	(BS 91-95) POD_33(Confidential)_bates.pdf	91-95	(1)

(1) This document is a scope of work document for a solar cost study that was prepared pursuant to a contract between Black & Veatch and Tampa Electric. This document contains confidential pricing data and is labeled as proprietary and confidential by Black & Veatch. Public disclosure of this contractual document would impair the efforts of Tampa Electric to contract for similar services on favorable terms in the future. As a result, this document is “proprietary confidential business information” under Section 366.093(3)(d) of the Florida Statutes.

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 —

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

CONFIDENTIAL MATERIAL REDACTED
BATES STAMPED PAGES 91-95

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BATES STAMPED PAGES 91-95