



Attorneys and Counselors at Law  
123 South Calhoun Street  
P.O. Box 391 32302  
Tallahassee, FL 32301

P: (850) 224-9115  
F: (850) 222-7560

ausley.com

April 2, 2024

VIA HAND DELIVERY

RECEIVED-FPSC  
2024 APR -2 PM 1:22  
COMMISSION  
CLERK

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

**REDACTED**

Re: Docket No. 20240026; Petition for rate increase by Tampa Electric Company.

Dear Mr. Teitzman:

Attached for filing in the above docket is Tampa Electric Company's Request for Confidential Classification and Request for Temporary Protective Order of certain information contained in its Petition for Rate Increase. Also attached is an accompanying USB containing the public (redacted) version of these documents.

Thank you for your assistance in connection with this matter.

Sincerely,

  
Virginia Ponder

VLP/ne  
Attachment

cc: All parties of record

- COM
- AFD
- APA
- ECO
- ENG  1 redacted USB
- GCL
- IDM
- CLK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

Petition for rate increase by Tampa Electric Company.

DOCKET NO. 20240026-EI

FILED: April 2, 2024

**TAMPA ELECTRIC COMPANY'S  
REQUEST FOR CONFIDENTIAL CLASSIFICATION  
AND REQUEST 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 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 April 2, 2024, Tampa Electric filed its Petition for Rate Increase ("Petition"), direct testimony and exhibits, and the required accompanying Minimum Filing Requirements ("MFRs"). The company believes that portions of (i) exhibit LC-1, Document No. 3 to the direct testimony of Lori L. Cifuentes and (ii) MFR Schedules C, D, E and F, as specified on Exhibit "A," constitute Confidential Information and has designated it as such by highlighting. Contemporaneous with the filing of this request, Tampa Electric submitted the Confidential Information to the Commission Clerk under a separate, confidential cover letter. Tampa Electric requests confidential classification for this information such that it will be entitled to protection against public disclosure pursuant to Section 366.093, Florida Statutes. 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), Florida Statutes. 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. Exhibit “B” contains the public versions of the Documents with Confidential Information.

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. 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)(a) of the Florida Administrative Code.

**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 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 2nd day of April, 2024.

Respectfully submitted,



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J. JEFFRY WAHLEN  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)  
MALCOLM N. MEANS  
[mmeans@ausley.com](mailto:mmeans@ausley.com)  
VIRGINIA L. PONDER  
[vponder@ausley.com](mailto:vponder@ausley.com)  
Ausley McMullen  
Post Office Box 391  
Tallahassee, Florida 32302  
(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that electronic copies of the foregoing Motion have been served by posting on a shared document site or by overnight (\*) or hand delivery (#) of a USB drive on April 2, 2024 to the following:

Adria Harper #  
Carlos Marquez #  
Timothy Sparks #  
Florida Public Service Commission/OGC  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850  
[aharper@psc.state.fl.us](mailto:aharper@psc.state.fl.us)  
[cmarquez@psc.state.fl.us](mailto:cmarquez@psc.state.fl.us)  
[tsparks@psc.state.fl.us](mailto:tsparks@psc.state.fl.us)  
[discovery-gcl@psc.state.fl.us](mailto:discovery-gcl@psc.state.fl.us)

Walt Trierweiler #  
Patricia Christensen #  
Octavio Ponce #  
Office of Public Counsel  
c/o The Florida Legislature  
111 West Madison Street, Room 812  
Tallahassee, FL 32399-1400  
[trierweiler.walt@leg.state.fl.us](mailto:trierweiler.walt@leg.state.fl.us)  
[christensen.patty@leg.state.fl.us](mailto:christensen.patty@leg.state.fl.us)  
[ponce.octavio@leg.state.fl.us](mailto:ponce.octavio@leg.state.fl.us)

Bradley Marshall #  
Jordan Luebkmann #  
Earthjustice  
111 S. Martin Luther King Jr. Blvd.  
Tallahassee, FL 32301  
[bmarshall@earthjustice.org](mailto:bmarshall@earthjustice.org)  
[jluebkmann@earthjustice.org](mailto:jluebkmann@earthjustice.org)

Mr. Robert Scheffel Wright #  
John LaVia, III #  
Gardner, Bist, Wiener, Wadsworth, Bowden,  
Bush, Dee, LaVia & Wright, P.A.  
1300 Thomaswood Drive  
Tallahassee, FL 32308  
[shef@gbwlegal.com](mailto:shef@gbwlegal.com)  
[jlavia@gbwlegal.com](mailto:jlavia@gbwlegal.com)

Jon Moyle #  
Karen Putnal #  
c/o Moyle Law Firm  
118 N. Gadsden Street  
Tallahassee, FL 32301  
[jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com)  
[kputnal@moylelaw.com](mailto:kputnal@moylelaw.com)  
[mqualls@moylelaw.com](mailto:mqualls@moylelaw.com)

Leslie R. Newton, Maj. USAF\*  
Ashley N. George, Capt. USAF \*  
AFLOA/JAOE-ULFSC  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base, Florida 32403  
[Leslie.Newton.1@us.af.mil](mailto:Leslie.Newton.1@us.af.mil)  
[Ashley.George.4@us.af.mil](mailto:Ashley.George.4@us.af.mil)

Thomas A. Jernigan \*  
AFCEC/JA-ULFSC  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base, Florida 32403  
[thomas.jernigan.3@us.af.mil](mailto:thomas.jernigan.3@us.af.mil)

Ebony M. Payton \*  
AFCEC-CN-ULFSC  
139 Barnes Drive, Suite 1  
Tyndall Air Force Base, Florida 32403  
[Ebony.Payton.ctr@us.af.mil](mailto:Ebony.Payton.ctr@us.af.mil)

Mark F. Sundback \*  
Sheppard Mullin Richter & Hampton LLP  
2099 Pennsylvania Ave., N.W., Suite 100  
Washington, D.C. 20006-6801  
[msundback@sheppardmullin.com](mailto:msundback@sheppardmullin.com)



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ATTORNEY

**EXHIBIT A  
JUSTIFICATION FOR CONFIDENTIAL TREATMENT**

<b>Direct Testimony and Exhibit of Lori Cifuentes</b>				
<b><u>Document</u></b>	<b><u>Bates Page Nos.</u></b>	<b><u>Column(s)</u></b>	<b><u>Row(s)</u></b>	<b><u>Justification(s)</u></b>
Exhibit LC-1 Document No. 3 to the direct testimony of Lori L. Cifuentes	29	Hillsborough County Real Household Income	2024 through 2033	(3)
Exhibit LC-1 Document No. 3 to the direct testimony of Lori L. Cifuentes	29	Hillsborough County Real Household Income	2024-2033 (Average Annual Growth Rates)	(3)
Exhibit LC-1 Document No. 3 to the direct testimony of Lori L. Cifuentes	29	Hillsborough County Persons Per Household	2024 through 2033	(3)
Exhibit LC-1 Document No. 3 to the direct testimony of Lori L. Cifuentes	29	Hillsborough County Persons Per Household	2024-2033 (Average Annual Growth Rates)	(3)
Exhibit LC-1 Document No. 3 to the direct testimony of Lori L. Cifuentes	29	Hillsborough County Commercial Real Gross Output (Millions)	2024 through 2033	(3)
Exhibit LC-1 Document No. 3 to the direct testimony of Lori L. Cifuentes	29	Hillsborough County Commercial Real Gross Output (Millions)	2024-2033 (Average Annual Growth Rates)	(3)

<b>Direct Testimony and Exhibit of Lori Cifuentes</b>				
<b><u>Document</u></b>	<b><u>Bates Page Nos.</u></b>	<b><u>Column(s)</u></b>	<b><u>Row(s)</u></b>	<b><u>Justification(s)</u></b>
Exhibit LC-1 Document No. 3 to the direct testimony of Lori L. Cifuentes	29	Hillsborough County Manufacturing Real Gross Output (Millions)	2024 through 2033	(3)
Exhibit LC-1 Document No. 3 to the direct testimony of Lori L. Cifuentes	29	Hillsborough County Manufacturing Real Gross Output (Millions)	2024-2033 (Average Annual Growth Rates)	(3)
Exhibit LC-1 Document No. 3 to the direct testimony of Lori L. Cifuentes	29	Hillsborough County Government Real Gross Output (Millions)	2024 through 2033	(3)
Exhibit LC-1 Document No. 3 to the direct testimony of Lori L. Cifuentes	29	Hillsborough County Government Real Gross Output (Millions)	2024-2033 (Average Annual Growth Rates)	(3)
Exhibit LC-1 Document No. 3 to the direct testimony of Lori L. Cifuentes	29	Hillsborough County Commercial Employment (Thousands)	2024 through 2033	(3)
Exhibit LC-1 Document No. 3 to the direct testimony of Lori L. Cifuentes	29	Hillsborough County Commercial Employment (Thousands)	2024-2033 (Average Annual Growth Rates)	(3)

<b>Direct Testimony and Exhibit of Lori Cifuentes</b>				
<b><u>Document</u></b>	<b><u>Bates Page Nos.</u></b>	<b><u>Column(s)</u></b>	<b><u>Row(s)</u></b>	<b><u>Justification(s)</u></b>
Exhibit LC-1 Document No. 3 to the direct testimony of Lori L. Cifuentes	29	Hillsborough County Manufacturing Employment (Thousands)	2024 through 2033	(3)
Exhibit LC-1 Document No. 3 to the direct testimony of Lori L. Cifuentes	29	Hillsborough County Manufacturing Employment (Thousands)	2024-2033 (Average Annual Growth Rates)	(3)
Exhibit LC-1 Document No. 3 to the direct testimony of Lori L. Cifuentes	29	Hillsborough County Construction Permits Number of Units	2024 through 2033	(3)
Exhibit LC-1 Document No. 3 to the direct testimony of Lori L. Cifuentes	29	Hillsborough County Construction Permits Number of Units	2024-2033 (Average Annual Growth Rates)	(3)

<b>MFR Schedule C – Net Operating Income</b>				
<b><u>Document</u></b>	<b><u>Bates Page Nos.</u></b>	<b><u>Column(s)</u></b>	<b><u>Line(s)</u></b>	<b><u>Justification(s)</u></b>
MFR C-33 Net Operating Income	104	(5)	14 & 16	(3)
MFR C-33 Net Operating Income	104	(6)	14 & 16	(3)

Exhibit A

<b>MFR Schedule C – Net Operating Income</b>				
<b><u>Document</u></b>	<b><u>Bates Page Nos.</u></b>	<b><u>Column(s)</u></b>	<b><u>Line(s)</u></b>	<b><u>Justification(s)</u></b>
MFR C-35 Payroll and Fringe Benefit Increases Compared to CPI	106	(4)	3	(3)
MFR C-35 Payroll and Fringe Benefit Increases Compared to CPI	106	(7)	3	(3)
MFR C-36 Non-Fuel Operation and Maintenance Expense Compared to CPI	107	(4)	11	(3)
MFR C-36 Non-Fuel Operation and Maintenance Expense Compared to CPI	107	(5)	11	(3)
MFR C-40 O&M Compound Multiplier Calculation	111	(4), (5), & (6)	10 & 12	(3)
MFR C-40 O&M Compound Multiplier Calculation	111	(4), (5), & (6)	10 & 12	(3)

Exhibit A

<b>MFR Schedule D – Cost of Capital</b>				
<b><u>Document</u></b>	<b><u>Bates Page Nos.</u></b>	<b><u>Column(s)</u></b>	<b><u>Line(s)</u></b>	<b><u>Justification(s)</u></b>
MFR D-2 Cost of Capital	6	2024 & 2025	23 through 41	(2)
MFR D-2 Cost of Capital	7	2024 & 2025	2 through 6	(2)

<b>MFR Schedule E - Vol II - Cost of Service Study 4 CP and Full MDS</b>				
<b><u>Document</u></b>	<b><u>Bates Page Nos.</u></b>	<b><u>Column(s)</u></b>	<b><u>Row(s)</u></b>	<b><u>Justification(s)</u></b>
MFR E Schedules Volume II Opt-Out Study	188	N/A	Customer Service Participant enrollment for eligible customers @ 9 mins/customer	(1) & (2)
MFR E Schedules Volume II Opt-Out Study	188	N/A	B&I AMI Opt Out action items for ineligible customers @ 14 mins/customer	(1) & (2)
MFR E Schedules Volume II Opt-Out Study	188	N/A	Planner Dispatcher to reroute meter @ 5 mins/customer	(1) & (2)
MFR E Schedules Volume II Opt-Out Study	188	N/A	Meter Field Rep to exchange meter @ 50 mins/customer	(1) & (2)
MFR E Schedules Volume II Opt-Out Study	189	Rate, Unit Cost and Annual Cost	Monthly Meter Reading done by TEC employee	(1) & (2)
MFR E Schedules Volume II Opt-Out Study	189	Rate, Unit Cost and Annual Cost	Monthly Meter Reading done by Contractor	(1) & (2)

<b>MFR Schedule E - Vol II - Cost of Service Study 4 CP and Full MDS</b>				
<b><u>Document</u></b>	<b><u>Bates Page Nos.</u></b>	<b><u>Column(s)</u></b>	<b><u>Row(s)</u></b>	<b><u>Justification(s)</u></b>
MFR E Schedules Volume II Opt-Out Study	189	Rate, Unit Cost and Annual Cost	Off-cycle Meter Reading	(1) & (2)
MFR E Schedules Volume II Opt-Out Study	189	Rate, Unit Cost and Annual Cost	Off-cycle Meter Reading - Vehicle	(1) & (2)
MFR E Schedules Volume II Opt-Out Study	190	Customer Service Professional	Annual Job Value, Hourly Rate 2025, & Total Hourly	(1) & (2)
MFR E Schedules Volume II Opt-Out Study	190	Business & Industry Account Specialist	Annual Job Value, Hourly Rate 2025, & Total Hourly	(1) & (2)
MFR E Schedules Volume II Opt-Out Study	190	Meter Field Rep (Union)	Annual Job Value, Hourly Rate 2025, & Total Hourly	(1) & (2)
MFR E Schedules Volume II Opt-Out Study	190	Planner Dispatcher (re-route – field)	Annual Job Value, Hourly Rate 2025, & Total Hourly	(1) & (2)
MFR E Schedules Volume II Opt-Out Study	190	Meter Field Rep (Reads) (Union)	Annual Job Value, Hourly Rate 2025, & Total Hourly	(1) & (2)
MFR E Schedules Volume II Opt-Out Study	190	Contractor (Rate inclusive of vehicle costs)	Annual Job Value, Hourly Rate 2025, & Total Hourly	(1) & (2)

<b>MFR Schedule F – Vol III – F3 through F9</b>				
<b><u>Document</u></b>	<b><u>Bates Page Nos.</u></b>	<b><u>Column(s)</u></b>	<b><u>Line(s)</u></b>	<b><u>Justification(s)</u></b>
MFR F-7 Volume III Forecasting Models & Historical Data	288	2024	Lines 5 through 10, 18, & 19.	(3)
MFR F-7 Volume III Forecasting Models & Historical Data	288	2025	Lines 5 through 10, 18, & 19.	(3)
MFR F-8 F Schedules Volume III Assumptions	292	2025	Lines 12 through 17, 25, & 26.	(3)

#### **Justifications**

- (1) The highlighted information consists of labor rates and calculations. This constitutes “[i]nformation concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility to contract for goods or services on favorable terms” under Section 366.093(3)(d), Florida Statutes.
- (2) The highlighted information relates to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. This information is protected by Section 366.093(3)(e), Florida Statutes.
- (3) The confidential information contained in these columns consists of the proprietary work product of Tampa Electric's consultant, Moody's Analytics ("Moody's"). Public disclosure of this information could allow duplication of the consultant's work without compensation for the consultant's efforts. This information is in the nature of a trade secret owned by Moody's, and disclosure of this information would impair Moody's competitive business interests by diminishing the demand for Moody's proprietary work production. This information is protected by Section 366.093(3), Florida Statutes.

**EXHIBIT B**  
**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	<u>      </u>
Public Version(s) of the Document(s) attached on USB	<u>  X  </u>

**EXHIBIT C**  
**JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD**

**N/A**