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April 25, 2024

VIA HAND DELIVERY

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COMMISSION
CLERK

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

REDACTED

Re: Docket No. 20240014-EG; Commission Review of Numeric Conservation Goals
(Tampa Electric Company)

Dear Mr. Teitzman:

Attached for filing in the above docket is Tampa Electric Company's Request Confidential Classification and Request for Temporary Protective Order pertaining to portions of the company's responses to the League of United Latin American Citizens' First Request for Production (No. 1), propounded on April 3, 2024.

Thank you for your assistance in connection with this matter.

Sincerely,

Malcolm N. Means

MNM/bml

Attachment (USB)

cc: All parties of record (w/att.)

- COM _____
- AFD _____
- APA _____
- ECO _____
- ENG _____
- GCL _____
- IDM _____
- CLK _____

I redacted USB Drive

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Commission review of)
Numeric Conservation Goals)
(Tampa Electric Company))
_____)

DOCKET NO. 20240014-EG

FILED: April 25, 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 25, 2024, Tampa Electric served a supplemental response to the League of United Latin American Citizens' First Request for Production (No. 1). The company believes that portions of this supplemental response, 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), 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. Exhibit “B” contains the public versions of the Document with the Confidential Information.

4. The Confidential Information contained in the Document 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 25th day of April, 2024.

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 Request for Confidential Classification filed on behalf of Tampa Electric Company has been furnished by electronic mail on this 25th day of April, 2024 to the following:

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ATTORNEY

**EXHIBIT A
JUSTIFICATION FOR CONFIDENTIAL TREATMENT**

(BS 8823) Cadmus Attachment J – 2024 DSM Technical Potential Study Pricing Matrix			
Tab	Columns	Cells/Range	Justification
J. Pricing Matrix - TPS	Billing Rate	C19:C28	(4), (5)
	Total Cost	N19:N30	(4), (5)
	Subtotal Consultant Cost	D30:L30	(4), (5)
	Subtotal Sub-Contractor Cost	D40:L40, N40	(4), (5)
	Subtotal Other Direct Cost	D46:L46, N46	(4), (5)
	Total Cost by Sub-Task	D49:L49, N49	(4), (5)
	Total Cost by Task	D50:L50, N50	(4), (5)
	Assumptions	A54:E54	(4), (5)

(BS 8823) Cadmus Attachment J – 2024 DSM Technical Potential Study Pricing Matrix			
Tab	Columns	Cells/Range	Justification
J. Pricing Matrix – EPS (All Companies)	Billing Rate	C18:C24	(4), (5)
	Total Cost	J18:J26	(4), (5)
	Subtotal Consultant Cost	D26:H26	(4), (5)
	Subtotal Sub-Contractor Cost	D36:H36, J36	(4), (5)
	Subtotal Other Direct Cost	D41:H41, J41	(4), (5)
	Total Cost by Sub-Task	D44:H44, J44	(4), (5)
	Total Cost by Task	D45:H45, J45	(4), (5)
	Assumptions	A49:E50	(4), (5)

Exhibit A

(BS 8823) Cadmus Attachment J – 2024 DSM Technical Potential Study Pricing Matrix			
Tab	Columns	Cells/Range	Justification
J. Pricing Matrix – APS (All Companies)	Billing Rate	C18:C24	(4), (5)
	Total Cost	H18:H26	(4), (5)
	Subtotal Consultant Cost	D26:F26	(4), (5)
	Subtotal Sub-Contractor Cost	D36:F36, H36	(4), (5)
	Subtotal Other Direct Cost	D41:F41, H41	(4), (5)
	Total Cost by Sub-Task	D44:F44, H44	(4), (5)
	Total Cost by Task	D45:F45, H45	(4), (5)
	Assumptions	A49:D50	(4), (5)

(BS 9532) ICF Attachment J – 2024 DSM Technical Potential Study Pricing Matrix			
Tab	Columns	Cells/Range	Justification
J. Pricing Matrix – TPS	Billing Rate	C22:C41	(4), (5)
	Total Cost	M22:M43	(4), (5)
	Subtotal Consultant Cost	D43:K43	(4), (5)
	Subtotal Sub-Contractor Cost	D48:K48, M48	(4), (5)
	Subtotal Other Direct Cost	D53:K53, M53	(4), (5)
	Total Cost by Sub-Task	D56:K56, M56	(4), (5)
	Total Cost by Task	D57:K57, M57	(4), (5)

(BS 9532) ICF Attachment J – 2024 DSM Technical Potential Study Pricing Matrix			
Tab	Columns	Cells/Range	Justification
J. Pricing Matrix – EPS (All Companies)	Billing Rate	C18:C37	(4), (5)
	Total Cost	I18:I39	(4), (5)
	Subtotal Consultant Cost	D39:G39	(4), (5)
	Subtotal Sub-Contractor Cost	D44:G44, I44	(4), (5)
	Subtotal Other Direct Cost	D49:G49, I49	(4), (5)
	Total Cost by Sub-Task	D52:G52, I52	(4), (5)
	Total Cost by Task	D53:G53, I53	(4), (5)

Exhibit A

(BS 9532) ICF Attachment J – 2024 DSM Technical Potential Study Pricing Matrix			
Tab	Columns	Cells/Range	Justification
J. Pricing Matrix – APS (All Companies)	Billing Rate	C18:C37	(4), (5)
	Total Cost	I18:I39	(4), (5)
	Subtotal Consultant Cost	D39:G39	(4), (5)
	Subtotal Sub-Contractor Cost	D44:G44, I44	(4), (5)
	Subtotal Other Direct Cost	D49:G49, I49	(4), (5)
	Total Cost by Sub-Task	D52:G52, I52	(4), (5)
	Total Cost by Task	D53:G53, I53	(4), (5)

(BS 9594) Resource Innovations Attachment J – 2024 DSM Technical Potential Study Pricing Matrix			
Tab	Columns	Cells/Range	Justification
J. Pricing Matrix – TPS	Billing Rate	C23:C33	(4), (5)
	Total Cost	AF23:AF36	(4), (5)
	Subtotal Consultant Cost	D36:AD36	(4), (5)
	Subtotal Sub-Contractor Cost	D45:AD45, AF45	(4), (5)
	Subtotal Other Direct Cost	D54:AD54, AF54	(4), (5)
	Total Cost by Sub-Task	D57:AD57, AF57	(4), (5)
	Total Cost by Task	D58:AD58, AD58	(4), (5)

(BS 9594) Resource Innovations Attachment J – 2024 DSM Technical Potential Study Pricing Matrix			
Tab	Columns	Cells/Range	Justification
J. Pricing Matrix – EPS (All Companies)	Billing Rate	C19:C29	(4), (5)
	Total Cost	Q19:Q32	(4), (5)
	Subtotal Consultant Cost	D32:O32	(4), (5)
	Subtotal Sub-Contractor Cost	D41:O41, Q41	(4), (5)
	Subtotal Other Direct Cost	D50:O50, Q50	(4), (5)
	Total Cost by Sub-Task	D53:O53, Q53	(4), (5)
	Total Cost by Task	D54:O54, Q54	(4), (5)

Exhibit A

(BS 9594) Resource Innovations Attachment J – 2024 DSM Technical Potential Study Pricing Matrix			
Tab	Columns	Cells/Range	Justification
J. Pricing Matrix – APS (All Companies)	Billing Rate	C19:C29	(4), (5)
	Total Cost	Q19:Q32	(4), (5)
	Subtotal Consultant Cost	D32:O32	(4), (5)
	Subtotal Sub-Contractor Cost	D41:O41, Q41	(4), (5)
	Subtotal Other Direct Cost	D50:O50, Q50	(4), (5)
	Total Cost by Sub-Task	D53:O53, Q53	(4), (5)
	Total Cost by Task	D54:O54, Q54	(4), (5)

Justifications

- (1) The highlighted information consists of trade secrets and is protected by Section 366.093(3)(a), Florida Statutes.
- (2) The highlighted information relates to internal auditing controls and reports of internal auditors and is protected by Section 366.093(b), Florida Statutes.
- (3) The highlighted information relates to security measures, systems, or procedures and is protected by Section 366.093(3)(c), Florida Statutes.
- (4) The highlighted information consists of contractual pricing data. 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.
- (5) 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.
- (6) The highlighted information relates to employee personnel information unrelated to compensation, duties, qualifications, or responsibilities, and is protected under Section 366.093(3)(f), Florida Statutes.
- (7) The highlighted information consists of the proprietary work product of certain third parties. Public disclosure of this information would allow duplication of these entity’s work without compensation for their efforts. This information is in the nature of a trade secret owned by such entities and disclosure of this information would impair their competitive business interests by revealing competitive pricing related information. This information is protected by Section 366.093(3)(a) and (e) of the 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 _____

Public Version(s) of the Document(s) attached in USB format X

EXHIBIT C
JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD

N/A