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April 26, 2024

VIA HAND DELIVERY

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

**REDACTED**

RECEIVED-FPSC  
2024 APR 26 PM 2:28  
COMMISSION  
CLERK

In re: Petition for Rate Increase by Tampa Electric Company

DOCKET NO. 20240026-EI

In re: Petition for approval of 2023 Depreciation and  
Dismantlement Study, by Tampa Electric Company

DOCKET NO. 20230139-EI

In re: Petition to implement 2024 Generation Base Rate  
Adjustment provisions in Paragraph 4 of the 2021 Stipulation  
and Settlement Agreement, by Tampa Electric Company

DOCKET NO. 20230090-EI

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 pertaining to portions of the company's responses to the Office of Public Counsel's First Set of Interrogatories and First Request for Production of Documents, propounded on March 12, 2024. 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 \_\_\_  
GCL \_\_\_  
IDM \_\_\_  
CLK \_\_\_

*redacted USB Drive*

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase by Tampa Electric Company

DOCKET NO. 20240026-EI

In re: Petition for approval of 2023 Depreciation and Dismantlement Study, by Tampa Electric Company

DOCKET NO. 20230139-EI

In re: Petition to implement 2024 Generation Base Rate Adjustment provisions in Paragraph 4 of the 2021 Stipulation and Settlement Agreement, by Tampa Electric Company

DOCKET NO. 20230090-EI

FILED: April 26, 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 11, 2024, Tampa Electric served its answers to Office of Public Counsel's First Set of Interrogatories (Nos. 1-49) and responses to Office of Public Counsel's First Request for Production of Documents (Nos. 1-30). On the same date, Tampa Electric filed its Notice of Intent to Request Confidential Classification<sup>1</sup> and its Motion for Temporary Protective Order.<sup>2</sup> On April 22, 2024, Tampa Electric served its supplemental response to OPC's Discovery Request Numbers

<sup>1</sup> See DN 01794-2024 filed on April 11, 2024, in Docket No. 20240026-EI

<sup>2</sup> See DN 01793-2024 filed on April 11, 2024, in Docket No. 20240026-EI

3, 9, and 21.<sup>3</sup> On the same date, the company filed its Notice of Intent to Request Confidential Classification<sup>4</sup> and Motion for Temporary Protective Order<sup>5</sup> for materials contained within portions of its supplemental response. On this date, the company serves its supplemental response to OPC's Discovery Request Numbers 7, 21, and 27.

The company believes that portions of its responses and supplemental responses to these interrogatories and requests for production, 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)-

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<sup>3</sup> See DN 02233-2024, filed on April 22, 2024, in Docket No. 20240026-EI

<sup>4</sup> See DN 02225-2024 filed on April 22, 2024, in Docket No. 20240026-EI

<sup>5</sup> See DN 02224-2024 filed on April 22, 2024, in Docket No. 20240026-EI

(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.

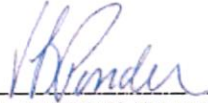
**Requested Duration of Confidential Classification**

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 26<sup>th</sup> day of April, 2024.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that electronic copies of the foregoing response have been served by electronic mail on this 26<sup>th</sup> day of April, 2024 to the following:

Adria Harper  
Carlos Marquez  
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ATTORNEY

**EXHIBIT A  
JUSTIFICATION FOR CONFIDENTIAL TREATMENT**

<b>First Set of Interrogatories (Nos. 1-49)</b>			
<b>Bates Page Nos.</b>	<b>Document Description</b>	<b>Description of Information</b>	<b>Justification</b>
13281	Copies of the percentage wage and salary increases implemented by Tampa Electric Company by date and employee category for each year 2021 through 2023, 2024 to date and budgeted/forecast for each year 2024 through 2027 provided in Tampa Electric's Response to OPC's First Set of Interrogatories, Number 10.	The Highlighted Information	(2) & (3)
13294-13302	Listings of the total compensation of each corporate officer of Tampa Electric Company or any other entity whose executive compensation costs are charged or allocated to Tampa Electric Company for 2020 through 2023 provided in Tampa Electric's Response to OPC's First Set of Interrogatories, Number 20.	The Highlighted Information	(2) & (3)
13321	List of all Tampa Electric Company internal audit reports for 2021 through 2023 provided in Tampa Electric's Response to OPC's First Set of Interrogatories, Number 29.	The Highlighted Information	(1)
13355-13372	Summary by vendor of all charges to account 923 for 2023 provided in Tampa Electric's Response to OPC's First Set of Interrogatories, Number 46.	The Highlighted Information	(2) & (3)

Exhibit A



13374	Summary by vendor of all charges to account 925 for 2023 provided in Tampa Electric's Response to OPC's First Set of Interrogatories, Number 47.	The Highlighted Information.	(2) & (3)
13376-13381	Summary by vendor of all charges to account 930 for 2023 provided in Tampa Electric's Response to OPC's First Set of Interrogatories, Number 48.	The Highlighted Information.	(2) & (3)

<b>First Request for Production of Documents (Nos. 1-30)</b>			
<b>Bates Page Nos.</b>	<b>Document Description</b>	<b>Description of Information</b>	<b>Justification</b>
265-433	Copies of documents containing the Tampa Electric's trial balances for December 31, 2022, December 31, 2024, December 31, 2023, and each month thereafter for which actual information is available, provided in Tampa Electric's Response to OPC's First Request for Production of Documents, Number 2.	The Highlighted Information	(1)
14222-14366	Copies of internal audit reports for 2021 through 2023 provided in Tampa Electric Company's Response to OPC's First Request for Production of Documents, Number 3.	The Highlighted Information	(1)
14366a	Copies of internal audit reports for 2021 through 2023 provided in Tampa Electric Company's Supplemental	The Highlighted Information	(1)

	Response to OPC's First Request for Production of Documents, Number 3.		
2573-2580	Copies of pension and post-retirement benefits actuarial studies provided in Tampa Electric Company's Response to OPC's First Request for Production of Documents, Number 5.	The Highlighted Information	(5)
2582	Same as above.	The Highlighted Information	(5)
2589-2756	Copies of reports for 2022 to the present by investors services (e.g., Moody's, Standard & Poor's, etc.) relating to the operations of Tampa electric Company, and Emera Inc., and presentations to each such investor service for the same period, provided in Tampa Electric's Response to OPC's First Request for Production of Documents, Number 6.	The Highlighted Information	(5)
2757-2766	Copies of billings for corporate services provided by Tampa Electric Company to the Emera family of companies including all invoices for 2022, 2023, and 2024 provided in Tampa Electric's response to OPC's First Request for Production of Documents, Number 7.	The Highlighted Information	(3)
2777-2784	Same as above.	The Highlighted Information	(3)
2795-2803	Same as above.	The Highlighted Information	(3)
2814-2819	Same as above.	The Highlighted Information	(3)
2829-2836	Same as above.	The Highlighted Information	(3)
2847-2855	Same as above.	The Highlighted Information	(3)
2866-2875	Same as above.	The Highlighted Information	(3)
2886-2893	Same as above.	The Highlighted Information	(3)

Exhibit A

2903-2912	Same as above.	The Highlighted Information	(3)
2924-2931	Same as above.	The Highlighted Information	(3)
2942-2953	Same as above.	The Highlighted Information	(3)
2964-2973	Same as above.	The Highlighted Information	(3)
2984-2991	Same as above.	The Highlighted Information	(3)
3002-3009	Same as above.	The Highlighted Information	(3)
3026-3040	Same as above.	The Highlighted Information	(3)
3042-3050	Same as above.	The Highlighted Information	(3)
3059-3065	Same as above.	The Highlighted Information	(3)
3076-3083	Same as above.	The Highlighted Information	(3)
3090-3106	Same as above.	The Highlighted Information	(3)
3117-3123	Same as above.	The Highlighted Information	(3)
3134-3142	Same as above.	The Highlighted Information	(3)
3153-3165	Same as above.	The Highlighted Information	(3)
3167-3171	Same as above.	The Highlighted Information	(3)
3181-3192	Same as above.	The Highlighted Information	(3)
3200ab-3200ac	Copies of billings for corporate services provided by Tampa Electric Company to the Emera family of companies including all invoices for 2022, 2023, and 2024 provided in Tampa Electric's supplemental response to OPC's First Request for Production of Documents, Number 7.	The Highlighted Information	(3)
4053-8479	Copies of Board of Directors Meeting minutes and board committee minutes and presentations provided in Tampa Electric's Response to OPC's First Request for Production of Documents, Number 9.	The Highlighted Information	(3)
13385-14221	Same as above.	The Highlighted Information	(3)
15716-16717	Same as above.	The Highlighted Information	(3)

Exhibit A

8480-10255	Copies of the two most recent Florida state and federal consolidated income tax returns provided in Tampa Electric's Response to OPC's First Request for Production of Documents, Number 10.	The Highlighted Information	(3)
10256-10308	Copies of requests for private letter ruling and IRS' responses provided in Tampa Electric's Response to OPC's First Request for Production, Number 11.	The Highlighted Information	(3)
10310-10329	Same as above.	The Highlighted Information	(3)
10354-10358	Same as above.	The Highlighted Information	(3)
10364	Same as above.	The Highlighted Information	(3)
10368-10371	Same as above.	The Highlighted Information	(3)
10376-10377	Same as above.	The Highlighted Information	(3)
10387	Same as above.	The Highlighted Information	(3)
10391-10394	Same as above.	The Highlighted Information	(3)
10399-10400	Same as above.	The Highlighted Information	(3)
10410	Same as above.	The Highlighted Information	(3)
10412-10413	Same as above.	The Highlighted Information	(3)
10415-10420	Same as above.	The Highlighted Information	(3)
10422	Same as above.	The Highlighted Information	(3)
10424-10427	Same as above.	The Highlighted Information	(3)
10429	Same as above.	The Highlighted Information	(3)
10440-10443	Same as above.	The Highlighted Information	(3)
10445	Same as above.	The Highlighted Information	(3)
10447-10503	Same as above.	The Highlighted Information	(3)
10505-10524	Same as above.	The Highlighted Information	(3)
10549-10553	Same as above.	The Highlighted Information	(3)
10559	Same as above.	The Highlighted Information	(3)
10563-10566	Same as above.	The Highlighted Information	(3)

Exhibit A

10571-10572	Same as above.	The Highlighted Information	(3)
10582	Same as above.	The Highlighted Information	(3)
10586-10589	Same as above.	The Highlighted Information	(3)
10594-10595	Same as above.	The Highlighted Information	(3)
10607	Copies of documents that support, evidence or relate to Tampa Electric's response to OPC's Interrogatory No. 1 provided in Tampa Electric's Response to OPC's First Request for Production, Number 12.	Row(s): 10 through 48, 56 through 88, 96 through 126, and 138 through 182, Column(s) F through R	(3)
10869-10873	Copies of correspondence between any credit rating agency and Tampa Electric Company, and Emera, Incorporated for the years 2022, 2023 and 2024 to date, provided in Tampa Electric's Response to OPC's First Request for Production, Number 20.	The Highlighted Information	(3) & (5)
10875-10876	Same as above.	The Highlighted Information	(3) & (5)
10878-10881	Same as above.	The Highlighted Information	(3) & (5)
10883-10888	Same as above.	The Highlighted Information	(3) & (5)
10899-10918	Same as above.	The Highlighted Information	(3) & (5)
10920-10926	Same as above.	The Highlighted Information	(3) & (5)
10929-10932	Same as above.	The Highlighted Information	(3) & (5)
10934-10937	Same as above.	The Highlighted Information	(3) & (5)
10939-10942	Same as above.	The Highlighted Information	(3) & (5)
10944-10948	Same as above.	The Highlighted Information	(3) & (5)
10950-10960	Same as above.	The Highlighted Information	(3) & (5)
10963-10966	Same as above.	The Highlighted Information	(3) & (5)
10968-10971	Same as above.	The Highlighted Information	(3) & (5)
10973-10976	Same as above.	The Highlighted Information	(3) & (5)
10978-10982	Same as above.	The Highlighted Information	(3) & (5)
10984-10994	Same as above.	The Highlighted Information	(3) & (5)

10997-11000	Same as above.	The Highlighted Information	(3) & (5)
11002-11005	Same as above.	The Highlighted Information	(3) & (5)
11007-11010	Same as above.	The Highlighted Information	(3) & (5)
11012-11016	Same as above.	The Highlighted Information	(3) & (5)
11018-11027	Same as above.	The Highlighted Information	(3) & (5)
11029-11038	Same as above.	The Highlighted Information	(3) & (5)
15039-15043	Copies of business analysis plans, phase project authorization plans and associated presentations for any plant additions provided in Tampa Electric's Response to OPC's First Request for Production of Documents, Number 21.	The Highlighted Information.	(2) & (4)
15045-15046	Same as above.	The Highlighted Information.	(2) & (4)
15050-15052	Same as above.	The Highlighted Information.	(2) & (4)
15059	Same as above.	The Highlighted Information.	(2) & (4)
15065-15068	Same as above.	The Highlighted Information.	(2) & (4)
15070-15071	Same as above.	The Highlighted Information.	(2) & (4)
15077	Same as above.	The Highlighted Information.	(2) & (4)
15084-15085	Same as above.	The Highlighted Information.	(2) & (4)
15087	Same as above.	The Highlighted Information.	(2) & (4)
15094	Same as above.	The Highlighted Information.	(2) & (4)
15101	Same as above.	The Highlighted Information.	(2) & (4)
15109	Same as above.	The Highlighted Information.	(2) & (4)
15111-15112	Same as above.	The Highlighted Information.	(2) & (4)
15114-15115	Same as above.	The Highlighted Information.	(2) & (4)
15122-15124	Same as above.	The Highlighted Information.	(2) & (4)
15135	Same as above.	The Highlighted Information.	(2) & (4)
15144	Same as above.	The Highlighted Information.	(2) & (4)
15149-15151	Same as above.	The Highlighted Information.	(2) & (4)
15161	Same as above.	The Highlighted Information.	(2) & (4)
15166-15167	Same as above.	The Highlighted Information.	(2) & (4)

Exhibit A

15171-15172	Same as above.	The Highlighted Information.	(2) & (4)
15178	Same as above.	The Highlighted Information.	(2) & (4)
15186	Same as above.	The Highlighted Information.	(2) & (4)
15192-15715	Copies of business analysis plans, phase project authorization plans and associated presentations for any plant additions provided in Tampa Electric's Supplemental Response to OPC's First Request for Production of Documents, Number 21.	The Highlighted Information.	(6)
11057-11058	Copies of the tax sharing agreements between Tampa Electric Company and its affiliates applicable for 2021 through 2024 to date provided in Tampa Electric's Response to OPC's First Request for Production, Number 24.	The Highlighted Information	(3)
11060-11093	Same as above.	The Highlighted Information	(3)
11428-11454	Copies of documents identified in OPC's First Set of Interrogatories, Number 46, provided in Tampa Electric's Response to OPC's First Request for Production, Number 27.	The Highlighted Information	(2), (3), & (4)
11456-11460	Same as above.	The Highlighted Information	(2), (3), & (4)
11462-11635	Same as above.	The Highlighted Information	(2), (3), & (4)
11641-11651	Same as above.	The Highlighted Information	(2), (3), & (4)
11657-11999	Same as above.	The Highlighted Information	(2), (3), & (4)
12002-12205	Same as above.	The Highlighted Information	(2), (3), & (4)
12209	Same as above.	The Highlighted Information	(2), (3), & (4)
12213-12235	Same as above.	The Highlighted Information	(2), (3), & (4)
12237	Same as above.	The Highlighted Information	(2), (3), & (4)
12239-12241	Same as above.	The Highlighted Information	(2), (3), & (4)

12244-12264	Same as above.	The Highlighted Information	(2), (3), & (4)
12266	Same as above.	The Highlighted Information	(2), (3), & (4)
12268	Same as above.	The Highlighted Information	(2), (3), & (4)
12270	Same as above.	The Highlighted Information	(2), (3), & (4)
12272	Same as above.	The Highlighted Information	(2), (3), & (4)
12274	Same as above.	The Highlighted Information	(2), (3), & (4)
12276	Same as above.	The Highlighted Information	(2), (3), & (4)
12278	Same as above.	The Highlighted Information	(2), (3), & (4)
12280	Same as above.	The Highlighted Information	(2), (3), & (4)
12282	Same as above.	The Highlighted Information	(2), (3), & (4)
12284	Same as above.	The Highlighted Information	(2), (3), & (4)
12286-12287	Same as above.	The Highlighted Information	(2), (3), & (4)
12289	Same as above.	The Highlighted Information	(2), (3), & (4)
12291-12292	Same as above.	The Highlighted Information	(2), (3), & (4)
12294	Same as above.	The Highlighted Information	(2), (3), & (4)
12296	Same as above.	The Highlighted Information	(2), (3), & (4)
12298	Same as above.	The Highlighted Information	(2), (3), & (4)
12300	Same as above.	The Highlighted Information	(2), (3), & (4)
12302	Same as above.	The Highlighted Information	(2), (3), & (4)
12304	Same as above.	The Highlighted Information	(2), (3), & (4)
12306	Same as above.	The Highlighted Information	(2), (3), & (4)
12308	Same as above.	The Highlighted Information	(2), (3), & (4)
12310	Same as above.	The Highlighted Information	(2), (3), & (4)
12312	Same as above.	The Highlighted Information	(2), (3), & (4)
12314	Same as above.	The Highlighted Information	(2), (3), & (4)
12316	Same as above.	The Highlighted Information	(2), (3), & (4)
12318	Same as above.	The Highlighted Information	(2), (3), & (4)
12320	Same as above.	The Highlighted Information	(2), (3), & (4)
12322	Same as above.	The Highlighted Information	(2), (3), & (4)
12325	Same as above.	The Highlighted Information	(2), (3), & (4)
12327	Same as above.	The Highlighted Information	(2), (3), & (4)
12329	Same as above.	The Highlighted Information	(2), (3), & (4)

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12331-12332	Same as above.	The Highlighted Information	(2), (3), & (4)
12334	Same as above.	The Highlighted Information	(2), (3), & (4)
12336	Same as above.	The Highlighted Information	(2), (3), & (4)
12338	Same as above.	The Highlighted Information	(2), (3), & (4)
12340	Same as above.	The Highlighted Information	(2), (3), & (4)
12342	Same as above.	The Highlighted Information	(2), (3), & (4)
12344	Same as above.	The Highlighted Information	(2), (3), & (4)
12346-12381	Same as above.	The Highlighted Information	(2), (3), & (4)
12383-12467	Same as above.	The Highlighted Information	(2), (3), & (4)
12469-12516	Same as above.	The Highlighted Information	(2), (3), & (4)
12518-12519	Same as above.	The Highlighted Information	(2), (3), & (4)
12521-12523	Same as above.	The Highlighted Information	(2), (3), & (4)
12526-12528	Same as above.	The Highlighted Information	(2), (3), & (4)
12531-12534	Same as above.	The Highlighted Information	(2), (3), & (4)
12536-12539	Same as above.	The Highlighted Information	(2), (3), & (4)
12541-12544	Same as above.	The Highlighted Information	(2), (3), & (4)
12546-12547	Same as above.	The Highlighted Information	(2), (3), & (4)
12550-12552	Same as above.	The Highlighted Information	(2), (3), & (4)
12554-12555	Same as above.	The Highlighted Information	(2), (3), & (4)
12558-12563	Same as above.	The Highlighted Information	(2), (3), & (4)
12564-12571	Same as above.	The Highlighted Information	(2), (3), & (4)
12572-12574	Same as above.	The Highlighted Information	(2), (3), & (4)
12576-12657	Same as above.	The Highlighted Information	(2), (3), & (4)
12659-12674	Same as above.	The Highlighted Information	(2), (3), & (4)
12676-12684	Same as above.	The Highlighted Information	(2), (3), & (4)
12686-12737	Same as above.	The Highlighted Information	(2), (3), & (4)
12739-12770	Same as above.	The Highlighted Information	(2), (3), & (4)
12772-12773	Same as above.	The Highlighted Information	(2), (3), & (4)
12775	Same as above.	The Highlighted Information	(2), (3), & (4)
12777-12822	Same as above.	The Highlighted Information	(2), (3), & (4)
12824-12836	Same as above.	The Highlighted Information	(2), (3), & (4)
12838	Same as above.	The Highlighted Information	(2), (3), & (4)

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12840-12879	Same as above.	The Highlighted Information	(2), (3), & (4)
12881	Same as above.	The Highlighted Information	(2), (3), & (4)
12883	Same as above.	The Highlighted Information	(2), (3), & (4)
12885-12921	Same as above.	The Highlighted Information	(2), (3), & (4)
12923-12972	Same as above.	The Highlighted Information	(2), (3), & (4)
12324a-12324b	Copies of documents identified in OPC's First Set of Interrogatories, Number 46, provided in Tampa Electric's Supplemental Response to OPC's First Request for Production, Number 27.	The Highlighted Information	(2), (3), & (4)
12973-12974	Copies of documents identified in OPC's First Set of Interrogatories, Number 47, provided in Tampa Electric's Response to OPC's First Request for Production, Number 28.	The Highlighted Information	(2), (3), & (4)
12976-12979	Same as above.	The Highlighted Information	(2), (3), & (4)
12980-12982	Copies of documents identified in OPC's First Set of Interrogatories, Number 48, provided in Tampa Electric's Response to OPC's First Request for Production, Number 29.	The Highlighted Information	(2), (3), & (4)
12984-12988	Same as above.	The Highlighted Information	(2), (3), & (4)
12990-12993	Same as above.	The Highlighted Information	(2), (3), & (4)
12994-12999	Same as above.	The Highlighted Information	(2), (3), & (4)
13000-13004	Same as above.	The Highlighted Information	(2), (3), & (4)
13006-13032	Same as above.	The Highlighted Information	(2), (3), & (4)
13035	Same as above.	The Highlighted Information	(2), (3), & (4)
13037-13038	Same as above.	The Highlighted Information	(2), (3), & (4)
13040-13042	Same as above.	The Highlighted Information	(2), (3), & (4)
13044-13045	Same as above.	The Highlighted Information	(2), (3), & (4)
13047-13050	Same as above.	The Highlighted Information	(2), (3), & (4)

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13054	Same as above.	The Highlighted Information	(2), (3), & (4)
13056-13058	Same as above.	The Highlighted Information	(2), (3), & (4)
13062-13067	Same as above.	The Highlighted Information	(2), (3), & (4)
13074-13078	Same as above.	The Highlighted Information	(2), (3), & (4)
13080-13088	Same as above.	The Highlighted Information	(2), (3), & (4)
13090	Same as above.	The Highlighted Information	(2), (3), & (4)

### Justifications

- (1) The highlighted information relates to internal auditing controls and reports of internal auditors and is protected by Section 366.093(b), Florida Statutes.
- (2) The highlighted information consists of labor rates, calculations, or bank information. 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.
- (3) 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.
- (4) 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.
- (5) 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
- (6) The highlighted information on the pages in question constitutes Critical Energy Infrastructure Information or CEII, defined by the Federal Energy Regulatory Commission as “specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that: (1) relates details about the production, generation, transportation, transmission, or distribution of energy; (2) could be useful to a person in planning an attack on critical infrastructure; (3) is exempt from mandatory disclosure under the Freedom of Information Act; and (4) does not simply give the general location of the critical infrastructure.” CEII includes, among other things, connectivity or switching maps or diagrams, which is the type of information contained in the above-referenced pages. In addition, Section 366.093(3)(c), Florida Statutes, identifies security

measures, systems or procedures as the type of information entitled to confidential protection. Public disclosure of the information in question could compromise the security interests of Tampa Electric and adversely affect the company and its customers. As such, the information is entitled to confidential protection and exemption from the Public Records Law pursuant to Section 366.093, Florida Statutes, and the referenced provisions of the FERC's CEII policy.”

**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 via USB.   X

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

**N/A**