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May 13, 2024

VIA HAND DELIVERY

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

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 of certain information contained in its responses to the Office of Public Counsel's Fourth Request for Production of Documents (Nos. 47-70). Also attached is an accompanying USB containing the public (redacted) version of these documents. On Friday, May 10, 2024, the company filed a Motion for Temporary Protective Order covering the same responses that are the subject of this request.

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 _____
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IDM _____
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COMMISSION CLERK
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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: May 13, 2024

**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 Friday, May 10, 2024, Tampa Electric served its responses to the Office of Public Counsel's ("OPC") Fourth Request for Production of Documents (Nos. 47-70) ("OPC's Fourth Request") and filed a Motion for Temporary Protective Order. Due to unusual storm activity, the Florida Public Service Commission's clerk's office was closed, and the company could not file its Request for Confidential Classification contemporaneously with its responses.

The company believes that portions of its response to OPC's Fourth Request, 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 Documents with the 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.

Requested Duration of Confidential Classification

5. 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 be accorded confidential classification for the reasons set forth herein and for 18 months.

DATED this 13th day of May, 2024.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that electronic copies of the foregoing request have been served by electronic mail on this 13th day of May, 2024 to the following:

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ATTORNEY

EXHIBIT A
JUSTIFICATION FOR CONFIDENTIAL TREATMENT

Fourth Request for Production of Documents (Nos. 47-70)			
Bates Page Nos.	Document Description	Description of Information	Justification
21114-21116	Copies of all presentations made to rating agencies and/or investment firms by TECO Energy, Inc., Tampa Electric Company, and Emera Incorporated between January 1, 2021, and the present, provided in Tampa Electric's response to Request for Production of Documents Number 47.	The Highlighted Information.	(1)
21118-21123	Same as above.	The Highlighted Information.	(1)
21125-21129	Same as above.	The Highlighted Information.	(1)
21131-21133	Same as above.	The Highlighted Information.	(1)
21135-21138	Same as above.	The Highlighted Information.	(1)
21141-21143	Same as above.	The Highlighted Information.	(1)
21145-21150	Same as above.	The Highlighted Information.	(1)
21152-21157	Same as above.	The Highlighted Information.	(1)
21159-21160	Same as above.	The Highlighted Information.	(1)
21162-21165	Same as above.	The Highlighted Information.	(1)
21167-21175	Same as above.	The Highlighted Information.	(1)
21177-21185	Same as above.	The Highlighted Information.	(1)
21792-21893	Copies of credit reports for TECO Energy, Inc., Tampa Electric Company, and Emera Incorporated between January 1, 2021, and the present from the major credit rating agencies (Moody's, S&P, and Fitch), provided in Tampa Electric's response	The Highlighted Information.	(1)

	to Request for Production of Documents Number 49.		
21894-21961	Copies of associated reports relating to change in credit and/or bond rating assigned to TECO Energy, Inc., Tampa Electric Company, and Emera Incorporated since the year 2015 by S&P, Moody's, and Fitch), provided in Tampa Electric's response to Request for Production of Documents Number 50.	The Highlighted Information.	(1)
21962-21963	Copies of associated source documents and work papers for the breakdown in the expected return on pension plan assets for Tampa Electric Company provided in Tampa Electric's response to Request for Production of Documents Number 51.	The Highlighted Information.	(1)
25873-25888	Copies of all articles, publications, regulatory decisions, references, and/or documents cited in the testimony of Jeff Chronister and/or footnotes provided in Tampa Electric's response to Request for Production of Documents Number 62.	The Highlighted Information.	(1)
25891-25926	Copies of all schedules, workpapers, and electronic workbooks used in the preparation of the study and presentation of the results provided in Tampa Electric's response to Request for Production of Documents Number 67.	The Highlighted Information.	(1) & (2)

Justifications

(1) 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.

(2) The confidential information contained in these columns consists of the proprietary work product of Tampa Electric's consultant, Burns McDonnell ("Burns"). 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 Burn's, and disclosure of this information would impair Burn's competitive business interests by diminishing the demand for Burn'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	_____
Public Version(s) of the Document(s) attached via USB	<u> X </u>

EXHIBIT C
JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD

N/A