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July 18, 2024

VIA HAND DELIVERY

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

REDACTED


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 Tampa Electric's Response to the Staff of the Florida Public Service Commission's Eighth Request for Production of Documents (Nos. 31-32), propounded by electronic mail on June 28, 2024, and Tampa Electric's Answers to the Florida Industrial Power Users Group's Fourth Set of Interrogatories (Nos. 41-44), propounded by electronic mail on July, 11, 2024.

Thank you for your assistance in connection with this matter.

Sincerely,


Virginia L. Ponder

VLP/ne
Attachment

cc: All parties of record

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

*I redacted
USB Drive*

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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: July 18, 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 this date, July 18, 2024, Tampa Electric served its Response to the Staff of the Florida Public Service Commission's ("Staff") Eighth Request for Production of Documents (Nos. 31-32) ("Response") and its Answer to the Florida Industrial Power Users Group's ("FIPUG") Fourth Set of Interrogatories (Nos. 41-44) ("Answer"). The company believes that portions of its Response and Answer, 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 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.

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 18th day of July, 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 18th day of July, 2024 to the following:

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ATTORNEY

EXHIBIT A
JUSTIFICATION FOR CONFIDENTIAL TREATMENT

Response to Staff's Eighth Request for Production of Documents (Nos. 31-32)			
Bates Page Nos.	Document Description	Description of Information	Justification
46817	Analysis, assumptions, and documents used to develop the forecasted coupon rate for the projected debt issuance, as provided in Tampa Electric's Response to Staff's Ninth Request for Production of Documents, No. 31.	<u>Bloomberg Outlook:</u> All <u>LTR for TECO et al:</u> Row(s): 9 and 26; Column(s): C through J Row(s): 14 through 17 and 31 through 34; Column(s): D <u>LTD Spreads:</u> All <u>STR for TECO et al:</u> Row(s): 10, 12, 22, 30, and 38; Column(s): E through L. <u>Term SOFR:</u> All <u>CP Fees:</u> All	(1) & (2)

Answer to FIPUG's Fourth Set of Interrogatories (Nos. 41-44)			
Bates Page Nos.	Document Description	Description of Information	Justification
46826-46834	Cost breakdowns of each tranche of SoBRAs, as provided in Tampa Electric's Response to FIPUG's Fourth Set of Interrogatories, No. 41.	The Highlighted Information	(1)

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 this document consists of the proprietary work product of Tampa Electric's consultants. 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 the consultants, and disclosure of this information would impair the consultant's competitive business interests by diminishing the demand for the consultant'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 X

EXHIBIT C
JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD

N/A