

FILED 8/8/2024 DOCUMENT NO. 08319-2024 FPSC - COMMISSION CLERK

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

August 8, 2024 VIA HAND DELIVERY FILING

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

In re: Petition for Rate Increase by Tampa Electric Company

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

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. 20240026-EI DOCKET NO. 20230139-EI

DOCKET NO. 20230090-EI

Dear Mr. Teitzman:

On April 30, 2024, Tampa Electric Company ("Tampa Electric" or the "company") filed its Request for Confidential Classification and Request for Temporary Protective Order (the "April 30 RCC") of certain information provided in Tampa Electric's responses to the Office of Public Counsel's First Request for Production of Documents (Nos. 1-30).

The company submits an amended Exhibit A to (1) provide an updated highlighted copy for Bates Number 207 to conform with the public version provided to the Commission with the April 30 RCC; and (2) revise the identification of confidential information for Bates Number 203 (Material_Labor_Adj) to conform to the appropriately designated highlighted copy. Accordingly, Tampa Electric submits the attached corrected Exhibit A. The highlighted copy for Bates Number 207 is being submitted under a separate confidential transmittal letter to the clerk.

Thank you for your assistance in this matter.

Sincerely,

Virginia Ponde

VLP/ne

cc: All Parties of Record (w/attachment)

¹ See DN 02600-2024 filed on April 30, 2024, in Docket No. 20240026-EI.

EXHIBIT A JUSTIFICATION FOR CONFIDENTIAL TREATMENT

First Request for Production of Documents (Nos. 1-30)				
Bates Page Nos.	Document Description	Description of Information	Justification	
191	Copies of Excel workbook files in live format, with formulas and calculations intact that were used to produce the Company's MFR filing, schedules, workpapers, and witness testimonies and exhibits, provided in Tampa Electric's Response to OPC's First Request for Production of Documents, Number 1.	D-2 (CONF) Row(s): 34 through 52 & 71 through 75; Column(s): O through S	(1) & (2)	
203	Same as above.	Labor_Vehicle Install & Maint Row(s): 21 through 24, 30 through 74, & 82 through 86; Columns(s): G through J Row(s): 82 through 86; Column(s): K & L Material_Labor Adj Row(s): 3 through 10, 14 through 22, 28 through 38, & 40 to 41; Column(s) C Row(s): 3 through 10; Column(s): D, J, & K. Row(s): 14 through 22; Column(s): K Install_Costs_COBRA_Roadway Row(s): 137 & 138; Column(s): E, G, H, L, N, O, S, U, V, Z, AB, AC, AG, AI, AJ, AN, AP, AQ, AU, AW, AX, BB, BD, BE, BI, BK, and BL. Install_Costs_SHOEBOX_AreaLight Row(s): 133 & 134; Column(s): E through H, L through O, and S through V. Install_Costs_FLOOD Row(s): 136 & 137; Column(s): E, G, H, L, N, & O. Install_Costs_POST_TOP Row(s): 93 & 94; Column(s): E, G, H, L, N, O, S, U, V, Z, AB, AC, AG, AI, AJ, AN, AP, AQ, AU, AW, and AX. Install_Costs_TIMBER & DB Row(s): 39 & 40; Column(s): E, G, H, L, N, & O. Install_Costs_POST_TOP POLE Row(s): 89 & 90; Column(s): E, G, H, L, N, O, S, U, V, Z, AB, AC, AG, AI, AJ, AN, AP, AQ, AU, AW, AX, BB, BD, BE, BI, BK, BL, BP, BR, BS, BW, BY,	(1) & (2)	

		BZ, CD, CF, CG, CK, CM, CN, CR, CT, CU, CY, DA, DB, DF, DH, & DI. Install Costs_ALUMINUM & STEEL Row(s): 93 & 94; Column(s): E, G, H, L, N, O, S, U, V, Z, AB, AC, AG, AI, & AJ Install Costs_CONCRETE Row(s): 92 & 93; Column(s): E, G, H, L, N, O, S, U, V, Z, AB, AC, AG, AI, AJ, AN, AP, AQ, AU, AW, AX, BB, BD, & BE Install Costs_WOOD Row(s): 98 & 99; Column(s): E, G, H, L, N, O, S, U, V, Z, AB, AC, AG, AI, & AJ.	
207	Same as above.	Factors Row(s): 5 through 33; Column(s): C Salary Grade Row(s): 8 through 35; Column(s): A & D through H Row(s): 8 through 30; Column(s): B & C Row(s): 8 through 36; Column(s): K & O Row(s): 8 through 28; Column(s): M Row(s): 8 through 31; Column(s): N & P Row(s): 6 through 16; Column(s): AA through AI Row(s): 48 through 54 & 56 through 60; Column(s): B through H Row(s): 62 through 66; Column(s): D through H.	(1) & (2)
208	Same as above.	S Year Cash Flow Row(s): 6 through 9; Column(s): D Metering Services - Ongoing Row(s): 4 & 6 through 8; Column(s): C, E, & H Labor Rates Row(s): 5, 7, & 14; Column(s): C through H	(1) & (2)

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.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing Amendment to Exhibit A have been served by electronic mail on this 8th day of August 2024 to the following:

Adria Harper
Carlos Marquez
Timothy Sparks
Daniel Dose
Florida Public Service Commission/OGC
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
aharper@psc.state.fl.us
cmarquez@psc.state.fl.us
tsparks@psc.state.fl.us
ddose@psc.state.fl.us
ddose@psc.state.fl.us
discovery-gcl@psc.state.fl.us

Walt Trierweiler Patricia Christensen Octavio Simoes-Ponce Charles Rehwinkel Mary Wessling **Austin Watrous** 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 christensen.patty@leg.state.fl.us ponce.octavio@leg.state.fl.us rehwinkel.charles@leg.state.fl.us wessling.mary@leg.state.fl.us watrous.austin@leg.state.fl.us

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
jlavia@gbwlegal.com

Jon Moyle Karen Putnal c/o Moyle Law Firm 118 N. Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com kputnal@moylelaw.com 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 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

Ebony M. Payton AFCEC-CN-ULFSC 139 Barnes Drive, Suite 1 Tyndall Air Force Base, Florida 32403 Ebony.Payton.ctr@us.af.mil

Michael A. Rivera, Capt, USAF AFLOA/JAOE-ULFSC 139 Barnes Drive, Suite 1 Tyndall Air Force Base, Florida 32403 Michael Rivera. 51@us.af.mil

Sari Amiel Sierra Club 50 F. Street NW, Eighth Floor Washington, DC 20001 sari.amiel@sierraclub.org Bradley Marshall
Jordan Luebkemann
Earthjustice
111 S. Martin Luther King Jr. Blvd.
Tallahassee, FL 32301
bmarshall@earthjustice.org
jluebkemann@earthjustice.org

Hema Lochan
Earthjustice
48 Wall St., 15th Fl
New York, NY 10005
hlochan@earthjustice.org
flcaseupdates@earthjustice.org

Stephanie U. Eaton Spilman Thomas & Battle, PLLC 110 Oakwood Drive, Suite 500 Winston-Salem, NC 27103 seaton@spilmanlaw.com Nihal Shrinath 2101 Webster Street, Suite 1300 Oakland, CA 94612 nihal.shrinath@sierraclub.org

Floyd R. Self Ruth Vafek Berger Singerman, LLP 313 North Monroe Street, Suite 301 Tallahassee, FL 32301 fself@bergersingerman.com rvafek@bergersingerman.com

Steven W. Lee Spilman Thomas & Battle, PLLC 1100 Bent Creek Boulevard, Suite 101 Mechanicsburg, PA 17050 slee@spilmanlaw.com

ATTORNEY