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FPSC - COMMISSION CLERK

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October 18, 2024

### Via Hand Delivery

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



COMMISSION

Re:

Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor; FPSC Docket No. 20240001-EI

Dear Mr. Teitzman:

Enclosed for filing in the above docket is Tampa Electric Company's Request for Confidential Classification for certain information contained in Staff's Fourth Set of Interrogatories (Nos. 7-10), specifically Number 10, Bates Page No. 6.

Thank you for your assistance in connection with this matter.

Sincerely,

Malcolm N. Means

MNM/bml Enclosure

cc: All Parties of Record (w/enc.)

AFD I EXT "B"

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#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor. DOCKET NO. 20240001-EI

FILED: October 18, 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 this date, Tampa Electric serves its answers to the Staff of the Florida Public Service Commission's ("Staff") Fourth Set of Interrogatories (Nos. 7-10). The company believes that portions of its answer to Staff's Fourth Set of Interrogatories, Number 10, 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.
- Exhibit "B" contains the public versions of the Documents with the Confidential Information.
- 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 and motion be accorded confidential classification for the reasons set forth herein and for 18 months.

DATED this 18th day of October, 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 18<sup>th</sup> day of October, 2024 to the following:

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**ATTORNEY** 

# EXHIBIT A JUSTIFICATION FOR CONFIDENTIAL TREATMENT

Staff's Fourth Set of Interrogatories				
Bates Page No.	Document Description	Description of Information	Justification(s)	
6	Tampa Electric's Answer to Staff's Fourth Set of Interrogatories, Number 10.	The Highlighted Information.	(1) & (2)	

### Justification(s)

- (1) The highlighted information consist of cost amounts related to natural gas storage. 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.

# 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	<u>X</u>
Public Version(s) of the Document(s) attached via USB	

## REDACTED

TAMPA ELECTRIC COMPANY DOCKET NO. 20240001-EI STAFF'S FOURTH SET OF INTERROGATORIES INTERROGATORY NO. 10 BATES PAGE(S): 6 OCTOBER 18, 2024

- **10.** Please refer to the Direct Testimony of TECO witness Heisey, page 6, lines 18-25 for the following question. Please identify the 2025 cost amount related to natural gas storage included in the Company's fuel cost recovery request.
- A. The cost amount related to natural gas storage included in the company's fuel cost recovery request is \_\_\_\_\_\_.

# EXHIBIT C JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD

N/A