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March 6, 2025

### VIA HAND DELIVERY

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



Re:

Review of Incentive Mechanisms for the Electric Investor-Owned Utilities

Dkt. 20250032-EI

Dear Mr. Teitzman:

Attached for filing in the above docket is Tampa Electric Company's Request for Confidential Classification pertaining to certain information contained in Tampa Electric's Response to Staff's First Data Request, Number 20, served on February 14, 2025.

Thank you for your assistance in connection with this matter.

Sincerely,

Malcolm N. Means

Welson N. Means

MNM/bml Attachment

All parties of record cc:

COM \_\_\_ AFD \_\_\_ APA ECO -ENG 1 EXL "B" GCL \_\_\_ IDM \_\_\_ CLK \_

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Incentive Mechanisms for the Electric Investor-Owned Utilities DOCKET NO. 20250032-EI

FILED:

March 6, 2025

## 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 response to Staff's First Data Request (Nos. 1-23) served on February 14, 2025. The company believes that portions of its responses, 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 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.

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 6<sup>th</sup> day of March 2025.

Respectfully submitted,

holista A. Mesn

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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Request, filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 6<sup>th</sup> day of March 2025 to the following:

Carlos Marquez
Shaw Stiller
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Florida Public Service Commission
2540 Shumard Oak Boulevard
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William C. Garner Southern Alliance for Clean Energy (25) 3425 Bannerman Road Unit 105, #414 Tallahassee, FL 32312 bgarner@wcglawoffice.com Bradley Marshall/Jordan Luebkemann 111 S. Martin Luther King Jr., Blvd. Tallahassee, FL 32301 bmarshall@earthjustice.org jluebkemann@earthjustice.org

**ATTORNEY** 

Molula N. Means

## EXHIBIT A JUSTIFICATION FOR CONFIDENTIAL TREATMENT

		'S RESPONSE TO STAFF'S EST (NOS. 1-23)		
Document Description	Bates No.	Description of Information	Justification	
Tampa Electric's Response to Staff's First Data Request, No. 20.	33	Rows: 2023 and 2024; Columns: Natural Gas		
		AMA Savings (\$000), Natural Gas Storage Optimization Savings (\$000), Delivered Gas Sales Savings (\$000),	(1) & (2)	
		Production Area Gas Sales Savings (\$000), and Resale of Solid Fuel Savings (\$000).		

### **Justifications**

- (1) The highlighted information consists of rates and calculations details regarding asset optimization activities. 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. Specifically, asset optimization activities and it discloses details of Tampa Electric's competitive and strategic approaches to asset optimization 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. 20250032-EI STAFF'S 1st DATA REQUEST REQUEST NO. 20 BATES PAGE(S): 32 - 33 MARCH 6, 2025

Year	Wholesale Power Sales Savings (\$000)	Wholesale Power Purchases Savings (\$000)	Natural Gas AMA Savings (\$000)	Natural Gas Storage Optimization Savings (\$000)	Delivered Gas Sales Savings (\$000)	Production Area Gas Sales Savings (\$000)	Resale of Solid Fuel Savings (\$000)	Total Activity Savings (\$000)
2013	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2014	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2015	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2016	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2017	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
2018	\$2,547	\$2,973	\$90	\$754	\$2	\$0	\$1	\$6,367
2019	\$1,499	\$4,428	\$277	\$10	\$0	\$0	\$255	\$6,468
2020	\$423	\$5,694	\$305	\$0	\$0	\$0	\$220	\$6,642
2021	\$1,024	\$8,692	\$604	\$152	\$0	\$2,540	\$427	\$13,440
2022	\$10,414	\$13,340	\$665	\$0	\$0	\$0	\$150	\$24,569
2023	\$2,555	\$6,773						\$10,045
2024*	\$4,641	\$5,906						\$11,442

<sup>\*</sup>The 2024 AOM True-up has not been filed and the above amounts are estimates

# EXHIBIT C JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD

N/A