

AUSLEY & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

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REDACTED

June 23, 2008

HAND DELIVERED

RECEIVED-FPSC
08 JUN 23 PM 1:36
COMMISSION
CLERK

Ms. Ann Cole, Director
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: UNDOCKETED - Review of IOU's Fuel and Purchased Power Hedging Programs

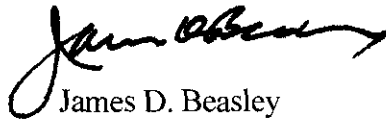
Dear Ms. Cole:

Enclosed for filing in the above-styled matter are the original and fifteen (15) copies of Tampa Electric Company's Request for Confidential Classification regarding its responses to Staff's Third Data Requests (Nos. 1-2).

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,


James D. Beasley

JDB/pp
Enclosure

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DOCUMENT NUMBER-DATE

05367 JUN 23 8

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of IOU's Fuel and)
Purchased Power Hedging Programs.)
)
_____)

UNDOCKETED
FILED: June 23, 2008

**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 highlighted information contained on Bates stamp page 1 of the company's responses to Staff's Third Data Request (Nos. 1-2) filed this date on a confidential basis under a separate transmittal letter in the above undocketed matter. In support of its request, Tampa Electric states as follows:

1. Subsection 366.093(1), Florida Statutes, provides that any records "found by the Commission to be propriety 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 "[i]nformation concerning . . . 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." Subsection 366.093(3)(d), Florida Statutes. Proprietary confidential business information also includes "[i]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information." Section 366.093(3)(e), Florida Statutes. The designated portions of the above-referenced data request responses, all highlighted in yellow and stamped "CONFIDENTIAL", fall within the statutory categories and, thus,

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FPSC-COMMISSION CLERK

constitute propriety 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 highlighted portions of Tampa Electric's responses to Staff's Third Data Request Nos. 1-2.

3. Attached hereto as Exhibit "B" are two public versions of the company's responses with the confidential information redacted.

4. The information contained in the referenced page of the company's data request responses is intended to be and is treated by Tampa Electric as private and has not been publicly disclosed.

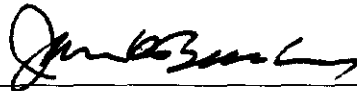
Requested Duration of Confidential Classification

5. Tampa Electric requests that the confidential information that is the subject of this request be treated by the Commission as confidential proprietary business information for a minimum of three years. The data in question provides detailed strategies, many of which are of a continuing nature and which could well be in place beyond the standard 18 month period that confidential information is treated as such by the Commission. The information in question would disclose the company's risk management strategies by making public the hedged prices Tampa Electric has settled on. Disclosing this type of information sooner than three years after it is submitted would arm would-be suppliers of goods and services, as well as competitors of Tampa Electric, with key components of the company's risk management strategies. A minimum of three years is essential to prevent those entities in the fuel and purchased power markets from having access to information they could use to the competitive disadvantage of Tampa Electric, which would increase the fuel and purchased power costs borne by Tampa Electric's customers.

WHEREFORE, Tampa Electric respectfully requests that the information set forth on Bates stamp page1 of Tampa Electric's responses to Staff's Third Data Request (Nos. 1 and 2) be accorded confidential classification for the reasons set forth above.

DATED this 23rd day of June 2008.

Respectfully submitted,



LEE L. WILLIS
JAMES D. BEASLEY
Ausley & McMullen
Post Office Box 391
Tallahassee, Florida 32302
(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

**JUSTIFICATION FOR CONFIDENTIAL TREATMENT OF HIGHLIGHTED
PORTIONS OF TAMPA ELECTRIC'S RESPONSES TO STAFF'S
THIRD DATA REQUEST (NOS. 1-2) (FILED MAY 5, 2008)**

<u>Data Request</u> <u>No.</u>	<u>Bates Page</u> <u>No.</u>	<u>Detailed Description</u>	<u>Rationale</u>
1	1	The Highlighted Information	(1)

- (1) The information contained on the listed page contains hedged fuel prices. This type of information on a commodity have been recognized by the Commission on numerous occasions to constitute proprietary confidential business information and the disclosure of which would be harmful to Tampa Electric's ability to contract for goods and services on favorable terms and, likewise, be harmful to the competitive interests of Tampa Electric. This is the specific type of information described in Section 366.093(3)(d) and (e) as being entitled to confidential protection and exemption from the Public Records Law.

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TAMPA ELECTRIC COMPANY
UNDOCKETED: REVIEW OF IOU'S FUEL
AND PURCHASED POWER HEDGING
PROGRAMS
STAFF'S THIRD DATA REQUEST
REQUEST NO. 1
PAGE 1 OF 1
FILED: MAY 5, 2008

1. For each month in 2003-2007, please provide the average price of the financial transactions settled during each month.

Average Monthly Financial Hedge Price (MMBtu)

Month	2007	2006	2005	2004	2003
January					
February					
March					
April					
May					
June					
July					
August					
September					
October					
November					
December					

A. Average Monthly Financial Hedge Price (\$/MMBtu)

Month	2007	2006	2005	2004	2003
January					
February					
March					
April					
May					
June					
July					
August					
September					
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TAMPA ELECTRIC COMPANY
 UNDOCKETED: REVIEW OF IOU'S FUEL
 AND PURCHASED POWER HEDGING
 PROGRAMS
 STAFF'S THIRD DATA REQUEST
 REQUEST NO. 2
 PAGE 1 OF 1
 FILED: MAY 5, 2008

2. For each month in 2003-2007, please provide the average cost of natural gas purchased by the company.

Average Monthly Fuel Price (MMBtu)

Month	2007	2006	2005	2004	2003
January					
February					
March					
April					
May					
June					
July					
August					
September					
October					
November					
December					

A. Average Monthly Fuel Price (\$/MMBtu)¹

Month	2007	2006	2005	2004	2003
January	7.16	12.70	7.22	9.14	11.16 ²
February	8.84	9.95	6.72	5.82	48.15 ²
March	8.18	8.60	7.31	5.07	7.70
April	9.01	8.49	9.59	6.65	6.81
May	8.92	8.96	7.54	6.81	6.06
June	9.23	7.77	8.15	8.21	8.14
July	8.62	7.43	8.89	7.43	6.87
August	8.37	9.12	10.02	7.43	6.32
September	7.47	8.18	16.40	6.37	6.36
October	8.10	7.21	14.59	6.33	5.53
November	8.92	8.52	12.63	8.70	5.13
December	8.68	8.04	13.42	10.16	5.46

¹These numbers are from Schedule A-5 and have been updated to remove hedge dollars and converted to MMBtu.

²Bayside was not in service prior to March 2003; however, the transportation charge for capacity to serve Bayside was incurred prior to commercial operation.

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AND PURCHASED POWER HEDGING
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STATE OF FLORIDA

COMMISSIONERS:
MATTHEW M. CARTER II, CHAIRMAN
LISA POLAK EDGAR
KATRINA J. MCMURRIAN
NANCY ARGENZIANO
NATHAN A. SKOP



OFFICE OF COMMISSION CLERK
ANN COLE
COMMISSION CLERK
(850) 413-6770

CONFIDENTIAL

Public Service Commission

ACKNOWLEDGEMENT

DATE: June 23, 2008

TO: James D. Beasley

FROM: Ruth Nettles, Office of Commission Clerk

RE: Acknowledgement of Receipt of Confidential Filing

This will acknowledge receipt of a **CONFIDENTIAL DOCUMENT** filed in Docket Number 080000 or, if filed in an undocketed matter, concerning highlighted information contained on Bates-stamp page 1 (and 2) of company's response to staff's 3rd Data Request (Nos. 1-2), and filed on behalf of Tampa Electric Company. The document will be maintained in locked storage.

If you have any questions regarding this document, please contact Marguerite Lockard, Deputy Clerk, at (850) 413-6770.

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PSC Website: <http://www.floridapsc.com>

Internet E-mail: contact@psc.state.fl.us