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April 14, 2016

VIA ELECTRONIC FILING

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Fuel and Purchased Power Cost Recovery Clause with Generating
Performance Incentive Factor; FPSC Docket No. 160001-EI


Dear Ms. Stauffer:

Enclosed for filing in the above docket is Tampa Electric Company's Request for Extension of Confidential Classification and Motion for Temporary Protective Order regarding Audit Work Papers pursuant to Audit Control No. 14-083-2-2.

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/ne
Enclosure

cc: All parties of record (w/enc.)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery)
clause with generating performance incentive)
factor.)
_____)

DOCKET NO. 160001-EI

FILED: April 14, 2016

**TAMPA ELECTRIC COMPANY'S FIRST REQUEST
FOR EXTENSION OF CONFIDENTIAL CLASSIFICATION
AND MOTION 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 an 18-month extension of the confidential classification of certain information supplied in connection with the Staff's audit workpapers pertaining to TECO's Audit Report, for Audit Control No. 14-083-2-2 in Docket No. 140001-EI on September 18, 2014 and, as grounds therefore, says:

1. On September 18, 2014 Tampa Electric filed a Request for Confidential Classification and Motion for Temporary Protective Order seeking confidential protection of certain documents selected as audit workpapers pursuant to Audit Control No. 14-083-2-2. By Order No. PSC-14-0565-CFO-EI issued October 13, 2014 the Commission granted Tampa Electric's September 18, 2014 request.
2. Tampa Electric adopts and incorporates by reference the September 18, 2014 request.
3. Tampa Electric is in need of continuing confidential treatment of certain of the pages that accompanied the September 18, 2014 request. Attached hereto is Exhibit "A" filed

September 18, 2014 identifying the page numbers for which Tampa Electric seeks an additional 18 months of confidential protection.

4. Each of the justifications numbers (1) through (4) still apply with respect to the highlighted pages.

5. The pages identified in Exhibit "A" continue to be proprietary confidential business information within the meaning of Section 366.093(3), Florida Statutes, are intended to be and have been treated by Tampa Electric as private. The confidentiality of the information in question has been maintained and public disclosure of the highlighted pages would cause harm to Tampa Electric and its customers.

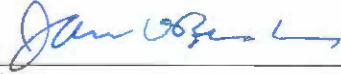
6. Nothing has changed since the company's September 18, 2014 filing to render the confidential information stale, such that continued confidential treatment would not be appropriate.

7. Upon a finding by the Commission that the confidential information remains proprietary and confidential business information, the information should not be declassified for at least an additional 18-month period and should be returned to Tampa Electric as soon as it is no longer necessary for the Commission to conduct its business. *See*, Section 366.093(4), Florida Statutes.

WHEREFORE, for the above and foregoing reasons, Tampa Electric respectfully requests that its First Request for Extension of Confidential Classification be granted.

DATED this 14th day of April 2016.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing First Request for Extension of Confidential Classification and Motion for Temporary Protective Order, filed on behalf of Tampa Electric Company, has been served by electronic delivery on this 14th day of April 2016, to the following:

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ATTORNEY

**JUSTIFICATIONS FOR CONFIDENTIAL
TREATMENT OF HIGHLIGHTED PORTIONS OF
TAMPA ELECTRIC'S DOCUMENTS SELECTED AS AUDIT
WORK PAPERS PURSUANT TO AUDIT CONTROL NO. 14-083-2-2**

<u>Work Papers:</u>	<u>Detailed Description</u>	<u>No. of Pages</u>	<u>Rationale</u>
2.12	Highlighted Information	1	(1)
2.14	Highlighted Information	1	(2)
2.16	Highlighted Information	1	(1)
44-1	All Information on Page	1	(1)
44-1.1	Highlighted Information	1	(1)
44-2	All Information on Page	1	(1)
44-2.1	All Information on Page	1	(1)
44-2.2	Highlighted Information	1	(1)
44-3	All Information on Page	1	(1)
44-3.1	Highlighted Information	1	(1)
44-4	All Information on Page	1	(1)
44-4.1	Highlighted Information	1	(1)
44-5	All Information on Page	1	(1)
44-5.1	Highlighted Information	1	(1)
44-6	All Information on Page	1	(1)
44-6.1	Highlighted Information	1	(1)
44-7	All Information on Page	1	(1)
44-7.1	All Information on Page	1	(1)
44-7.2	Highlighted Information	1	(1)
44-8	All Information on Page	1	(1)
44-8.1	Highlighted Information	1	(1)
44-9	All Information on Page	1	(1)
44-9.1	Highlighted Information	1	(1)
44-10	All Information on Page	1	(1)
44-10.1	Highlighted Information	1	(1)
44-11	All Information on Page	1	(1)
44-11.1	All Information on Page	1	(1)
44-11.2	Highlighted Information	1	(1)
44-12	All Information on Page	1	(1)
44-12.1	All Information on Page	1	(1)
44-12.2	Highlighted Information	1	(1)
45	Highlighted Information	1	(1)
45-1.2	Highlighted Information	1	(1)
45-1.3	Highlighted Information	1	(1)
45-1.4 through 45-1.71	All Information on Page	67	(3)
45-2.1	Highlighted Information	1	(1)
45-2.2	Highlighted Information	1	(1)

<u>Work Papers:</u>	<u>Detailed Description</u>	<u>No. of Pages</u>	<u>Rationale</u>
45-2.3 through 45-2.57	All Information on Page	54	(3)
47.2	Highlighted Information	1	(4)
47.3	Highlighted Information	1	(4)
57	Highlighted Information	1	(1)
57.8	Highlighted Information	1	(1)

- (1) The highlighted information contains specific details about fuel hedging volume, pricing, percentages and/or counterparties. This type of information about a commodity has been recognized by the Commission on numerous occasions to constitute proprietary confidential business information. Knowledge of this information would allow the opportunity for market manipulation through transactions made in anticipation of the company's entry into the market. Market manipulations based on knowledge of the highlighted information would increase the price of fuel paid by Tampa Electric's customers as well as the price paid by the company to hedge the customers' price of fuel. 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.
- (2) The highlighted information includes Tampa Electric's bid evaluations and contains agreed upon commodity rates. Commodity rates 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. 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.
- (3) The information contained on the listed pages includes Tampa Electric's extended credit limits for trading companies. The disclosure of the counterparties and credit terms could cause other trading entities to modify existing or potential future terms of any agreements. As such, public disclosure of the information would adversely affect the competitive interests of Tampa Electric and its ability to contract for goods and services on favorable terms. The disclosure of this information would therefore be harmful to competitive interests, and as such, the information is entitled to confidential treatment pursuant to Section 366.093(d) and (e), Florida Statutes.
- (4) The confidential information shows estimated purchase amounts pursuant to confidential contracts as negotiated by and between Tampa Electric Company and certain energy providers. As such, the information in question is information concerning bids or other contractual data the disclosure of which would impair the efforts of Tampa Electric to contract for goods and services on favorable terms. It is also information relating to competitive interests, the disclosure of which would impair the competitive business of Tampa Electric. The confidential information falls within the above statutory categories and, thus, constitutes proprietary confidential business information entitled to protection under Section 366.093 and Rule 25-22.06.