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ATTORNEYS AND COUNSELORS AT LAW

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(850) 224-9115 FAX (850) 222-7560

July 31, 2020

HAND DELIVERED

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

REDACTED

Re: Docket No. 20200064-EI; Petition by Tampa Electric Company for a limited proceeding to approve Fourth SoBRA effective January 1, 2021

Dear Mr. Teitzman:

Enclosed for filing in the above docket are the original and seven (7) copies of Tampa Electric Company's Request for Confidential Classification and Motion for Temporary Protective Order of portions of Mark D. Ward's Exhibit No. ___ (MDW-1). The confidential document to which this Request and Motion relates is being filed simultaneously under a separate cover letter.

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,

J. Jeffry Wahlen

JJW Enclosure

cc: Service List (w/enc.)

COM ___

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Tampa Electric Company)	DOCKET NO. 20200064-EI
for a limited proceeding to approve Fourth SoBRA)	
effective January 1, 2020.)	FILED: July 31, 2020
)	·

TAMPA ELECTRIC COMPANY'S REQUEST FOR 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 request 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)

Those portions of Tampa Electric's witness Mark D. Ward's Exhibit No. ___ (MDW-1) that are highlighted in yellow or printed on yellow paper stock and stamped "CONFIDENTIAL" which are being submitted this date in the above docket. 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 "[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]information 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 Confidential Information that is the subject of this request and motion falls within the 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 Document(s).
- 3. Attached hereto as Exhibit "B" are two public versions of the Document(s) with the Confidential Information redacted, unless previously filed as indicated.
- 4. The Confidential Information contained in the Document(s) is intended to be and is treated by Tampa Electric as private and has not been publicly disclosed.
- 5. For the same reasons set forth herein in support of its request for confidential classification, Tampa Electric also moves the Commission for entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

Requested Duration of Confidential Classification

6. Tampa Electric requests that the Confidential Information be treated by the Commission as confidential proprietary business information for at least the 18 month period prescribed in Rule 25-22.006(9)(a), Florida Administrative Code. 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 Company 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 a minimum period of 18 months, subject to any request for a longer period of confidential classification as may be set forth in Exhibit "C" to this request and motion. The company further moves for the entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

DATED this 31st day of July, 2020.

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 Request for Confidential Classification and Motion for Temporary Protective Order, filed on behalf of Tampa Electric Company, has been served by electronic mail on this 31th day of July, 2020 to the following:

Office of Public Counsel
J. R. Kelly
Public Counsel
Charles Rehwinkel
Associate Public Counsel
c/o The Florida Legislature
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The Florida Industrial Power Users Group Jon C. Moyle, Jr.
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The Perkins House
118 North Gadsden Street
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imoyle@moylelaw.com

WCF Hospital Utility Alliance Mark F. Sundback Sheppard Mullin 2099 Pennsylvania Ave., Suite 100 Washington, D.C. 20006-6801 msundback@sheppardmullin.com Federal Executive Agencies Thomas Jernigan AFLOA/JACL-ULFSC 139 Barnes Drive, Suite 1 Tyndall Air Force Base, FL 32403 thomas.jernigan.3@us.af.mil

Florida Retail Federation Robert Scheffel Wright Gardner, Bist, Bowden, Bush, Dee, LaVia & Wright, P.A. 1300 Thomaswood Drive Tallahassee, FL 32308 schef@gbwlegal.com

APTORNEY

JUSTIFICATION FOR CONFIDENTIAL TREATMENT OF HIGHLIGHTED PORTIONS OF THE EXHIBIT OF MARK D. WARD'S EXHIBIT NO. ___ (MDW-1) FILED JULY 31, 2020

Exhibit of Mar	Exhibit of Mark D. Ward:				
Bates Stamp	Document No.	Detailed Description	Rationale		
Page No. 20	1 (3 of 3)	All Yellow Highlighted Information	(1)		

⁽¹⁾ The information listed in the exhibit contains bid related information provided in response to Tampa Electric's Request for Information or during contract negotiations with vendors. The disclosure of this information would 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 and Rule 25-22.006, Florida Administrative Code.

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) previously filed on		

Exhibit "B"

REDACTED

TAMPA ELECTRIC COMPANY
DOCKET NO. 20200064-EI
EXHIBIT NO. (MDW-1)
DOCUMENT NO. 1

PAGE 3 OF 3

FILED: 07/31/2020

Durrance Solar

Projected Installed Costs (\$ Million)	
Project Output (MW _{ac})	45.7
Major Equipment ¹	
Balance of System ²	
Development	1.6
Transmission Interconnect	3.0
Land	5.8
Owners Costs	1.0
Total Installed Cost (\$ Million)	66.7
AFUDC (\$ Million)	1.9
Total All-in-Cost (\$ Million)	68.6
Total (\$ per kW _{ac})	1,500

¹ Major Equipment includes modules, inverters, and transformers

Note: Totals may not sum due to rounding.

² Balance of System includes racking, posts, collection cables, EPC contractor, and project management

REDACTED

TAMPA ELECTRIC COMPANY
DOCKET NO. 20200064-EI
EXHIBIT NO. (MDW-1)
DOCUMENT NO. 1

PAGE 3 OF 3

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² Balance of System includes racking, posts, collection cables, EPC contractor, and project management

REQUESTED DURATION OF CONFIDENTIAL CLASSIFICATION

Tampa Electric requests that the Confidential Information that is the subject of this request be treated as proprietary confidential business information exempt from the Public Records Law for a minimum of 18 months from the date of the order granting such classification. To the extent the company needs confidential protection of the Confidential Information for a period longer than 18 months, the company's justification therefor is set forth below:

n/a