

# AUSLEY & McMULLEN

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ORIGINAL

October 21, 2002

HAND DELIVERED

RECEIVED-TPSC  
OCT 21 PM 3:01  
COMMISSION  
CLERK

Ms. Blanca S. Bayo, Director  
Division of Commission Clerk  
and Administrative Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance  
Incentive Factor; FPSC Docket No. 020001-EI

Dear Ms. Bayo:

Enclosed for filing in the above docket is the original and ten (10) copies of Tampa  
Electric Company's Request for Confidential Classification regarding answers to Staff's First Set  
of Interrogatories Nos. 6 and 25.

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

- AUS \_\_\_\_\_
- CAF \_\_\_\_\_
- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- MMS \_\_\_\_\_
- SEC \_\_\_\_\_
- OTH \_\_\_\_\_

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

*Marguerite (red)*

RECEIVED & FILED

  
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

11430 OCT 21 02

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery )  
Clause with Generating Performance Incentive ) DOCKET NO. 020001-EI  
Factor. ) FILED: October 21, 2002  
\_\_\_\_\_ )

**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 in Tampa Electric Company’s answers to Staff’s First Set of Interrogatories Nos. 6 and 25 (the “Confidential Information”) which were filed on a confidential basis in the above docket on September 30, 2002, pursuant to a Notice of Intent to Seek Confidential Classification. Two public copies of the company’s answers to Interrogatories Nos. 6 and 25 with the Confidential Information redacted are also enclosed with this request. In support of its request, Tampa Electric states as follows:

1. Subsection 366.093(1) 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) [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). 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). The Confidential Information falls within these statutory categories and, thus, constitutes proprietary confidential business information entitled to protection under Section 366.093 and Rule 25-22.006.

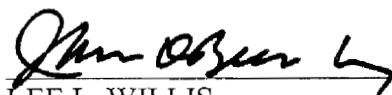
2. Attached hereto as Exhibit “A” is a detailed justification for designating the Confidential Information proprietary confidential business information under the above-referenced statute and rule.

3. The material for which confidential classification is sought is intended to be and is treated by Tampa Electric as private and has not been disclosed.

WHEREFORE, Tampa Electric Company respectfully requests that the highlighted Confidential Information set forth in the company’s answers to Interrogatories Nos. 6 and 25 be accorded confidential classifications for the reasons set forth above.

DATED this 21<sup>st</sup> day of October 2002.

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification has been furnished by U. S. Mail or hand delivery (\*) on this 21<sup>st</sup> day of October 2002 to the following:

Mr. Wm. Cochran Keating, IV\*  
Senior Attorney  
Division of Legal Services  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0863

Mr. James A. McGee  
Associate General Counsel  
Florida Power Corporation  
Post Office Box 14042  
St. Petersburg, FL 33733

Mr. Joseph A. McGlothlin  
Ms. Vicki Gordon Kaufman  
McWhirter, Reeves, McGlothlin, Davidson,  
Decker, Kaufman, Arnold & Steen, P.A.  
117 S. Gadsden Street  
Tallahassee, FL 32301

Mr. Robert Vandiver  
Associate Public Counsel  
Office of Public Counsel  
111 West Madison Street – Suite 812  
Tallahassee, FL 32399-1400

Mr. Norman Horton  
Messer Caparello & Self  
215 South Monroe St. Suite 701 (32301)  
Post Office Box 1876  
Tallahassee, FL 32302

Mr. John T. Butler  
Steel Hector & Davis LLP  
200 South Biscayne Boulevard  
Suite 4000  
Miami, FL 33131-2398

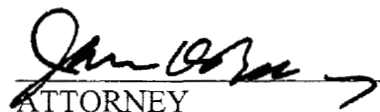
Mr. William Walker  
Florida Power & Light Company  
215 South Monroe Street, Suite 810  
Tallahassee, FL 32301-1859

Mr. R. Wade Litchfield  
Florida Power & Light Company  
700 Universe Blvd.  
Juno Beach, FL 33408

Mr. John W. McWhirter, Jr.  
McWhirter, Reeves, McGlothlin, Davidson,  
Decker, Kaufman, Arnold & Steen, P.A.  
Post Office Box 3350  
Tampa, FL 33601

Ms. Susan Ritenour  
Gulf Power Company  
One Energy Place  
Pensacola, FL 32520

Mr. Jeffrey A. Stone  
Mr. Russell A. Badders  
Beggs & Lane  
Post Office Box 12950  
Pensacola, FL 32591-2950

  
ATTORNEY

**JUSTIFICATION FOR CONFIDENTIAL TREATMENT  
OF HIGHLIGHTED PORTIONS OF TAMPA ELECTRIC COMPANY'S  
ANSWERS TO STAFF'S FIRST SET OF INTERROGATORIES NOS. 6 AND 25**

**Interrogatory No. 6**

The highlighted portions of Tampa Electric's answer to Interrogatory No. 6 disclose the marginal cost of the various system resources Tampa Electric relies on in meeting its total load, as well as the extent to which Tampa Electric relies on each resource. Public disclosure of this information would arm present and potential energy suppliers of Tampa Electric with information useful in negotiating a higher price for power supplied to Tampa Electric than might otherwise be the case. It would also disclose to Tampa Electric's wholesale competitors information with which to model Tampa Electric's system operations and thereby gain a competitive advantage over Tampa Electric with respect to potential wholesale sales opportunities. These results would harm the financial interests of Tampa Electric and drive up the cost of power to the retail customers served by Tampa Electric. As a consequence, the highlighted information in question is entitled to confidential treatment pursuant to Section 366.093, Florida Statutes. That Statute defines proprietary confidential business information to include, but be limited to:

(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.

Public disclosure of the highlighted portions of Tampa Electric's answer to Interrogatory No. 6 would harm the competitive interests of Tampa Electric and impair the efforts of the company to

contract for goods and services on favorable terms. As such, the information is entitled to confidential protection.

**Interrogatory No. 25**

If made public, the highlighted data set forth in lines 1 and 3 (all columns) in Tampa Electric's answer to Staff Interrogatory No. 25 would enable competitors and existing and potential customers of Tampa Electric's transportation affiliates to approximate the affiliates' transportation rates using other publicly available information. This would provide them with a competitive advantage (in the case of competitors) or, in the case of present and potential transportation customers, a lower price than the customer might otherwise be willing to pay. This would harm the competitive and economic interests of Tampa Electric's affiliates and ultimately Tampa Electric's retail customers. Consequently, the information in question is entitled to confidential treatment pursuant to Section 366.093 which provides that proprietary confidential business information includes, but is not limited to:

(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.

The remaining highlighted information in Tampa Electric's answer to Staff Interrogatory No. 25 discloses Tampa Electric's costs in detailed categories of the type Tampa Electric does not make public and which Tampa Electric believes would harm its competitive interests and ultimately disadvantage its retail ratepayers. Tampa Electric's competitors in the wholesale power market and its present and potential customers in that market could utilize this degree of detail together with other publicly filed information to more effectively compete against Tampa

Electric for wholesale sales or, in the case of present and potential customers, to negotiate a better price than they might otherwise be willing to pay. As such, the detailed information contained in Tampa Electric's answer to Interrogatory No. 25 is entitled to protection pursuant to Section 366.093 which provides that proprietary confidential business information includes, with is not limited to:

(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.

**TAMPA ELECTRIC COMPANY  
DOCKET NO. 020001-EI  
STAFF'S 1<sup>ST</sup> SET OF INTERROGATORIES  
INTERROGATORY NO. 6  
PAGE 1 OF 11  
FILED: SEPTEMBER 30, 2002**

- 6.** For each hour referenced in response to Staff's Interrogatory No. 3, provide the following information for each resource in ascending order of marginal cost that Tampa Electric dispatched to meet its total load.
- a. Name of system resource
  - b. Output of system resource; and
  - c. Marginal cost of system resource

For purposes of this Interrogatory, a system resource can include, but is not limited to Tampa Electric's generating units; a wholesale energy purchase; interruptible or curtailable load; and dispatchable load management.

- A.** In 2001, Tampa Electric Company replaced its Energy Management System, the company's primary source of data for generator MWH output on an hourly basis. Many of the database values were compromised in the transition to the new system. Therefore, the attached tables contain Tampa Electric's best estimates of the hourly unit output and the marginal costs associated with the estimated output values.



01/05/2001  
HE 7:00

Output  
MWH

Marginal  
Cost

**Generating Unit**

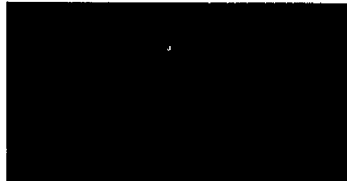
BB 1  
BB 2  
BB 3  
BB 4  
BBP1  
BBP2  
BBP3  
GA 1  
GA 2  
GA 3  
GA 4  
GA 5  
GA 6  
HCC1  
HCC2  
HDCT 2B  
HP 1  
HP 2  
HP 3  
HP 4  
HP 5  
PH 1  
PH 2  
PKCT  
POLK  
PSCOT



**Wholesale Energy Purchases**

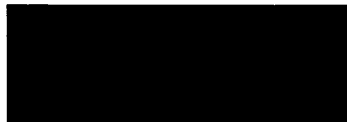
Sell Co.

FPL  
FPL  
PLK  
KET  
FPL  
OKE



**Cogen**

As-available  
Firm  
Orange Co  
Wheeled



**Interruptible  
DSM**



Note: Tampa Electric does not have a marginal cost estimate associated with interruptible and DSM.

01/05/2001  
HE 8:00

Output  
MWH                      Marginal  
   Cost

**Generating Unit**

BB 1	
BB 2	
BB 3	
BB 4	
BBP1	
BBP2	
BBP3	
GA 1	
GA 2	
GA 3	
GA 4	
GA 5	
GA 6	
HCC1	
HCC2	
HDCT 2B	
HP 1	
HP 2	
HP 3	
HP 4	
HP 5	
PH 1	
PH 2	
PKCT	
POLK	
PSCOT	

**Wholesale Energy Purchases**

**Sell Co.**

KET	
PLK	
FPL	
OKE	
PLK	
OKE	

**Cogen**

As-Available	
Firm	
Orange Co	
Wheeled	

<b>Interruptible</b>	
<b>DSM</b>	

Note: Tampa Electric does not have a marginal cost estimate associated with interruptible and DSM.

01/05/2001  
HE 9:00

Output  
MWH            Marginal  
                         Cost

**Generating Unit**

BB 1	
BB 2	
BB 3	
BB 4	
BBP1	
BBP2	
BBP3	
GA 1	
GA 2	
GA 3	
GA 4	
GA 5	
GA 6	
HCC1	
HCC2	
HDCT 2B	
HP 1	
HP 2	
HP 3	
HP 4	
HP 5	
PH 1	
PH 2	
PKCT	
POLK	
PSCOT	

**Wholesale Energy Purchases**

**Sell Co.**

KET	
PLK	
CRGL	
FPL	
OKE	
PLK	
FPL	

**Cogen**

As-available	
Firm	
Orange Co	
Wheeled	

**Interruptible  
DSM**

--

Note: Tampa Electric does not have a marginal cost estimate associated with interruptible and DSM.

01/10/2001  
HE 7:00

Output  
MWH                      Marginal  
   Cost

**Generating Unit**

BB 1	
BB 2	
BB 3	
BB 4	
BBP1	
BBP2	
BBP3	
GA 1	
GA 2	
GA 3	
GA 4	
GA 5	
GA 6	
HCC1	
HCC2	
HDCT 2B	
HP 1	
HP 2	
HP 3	
HP 4	
HP 5	
PH 1	
PH 2	
PKCT	
POLK	
PSCOT	

**Wholesale Energy Purchases**

**Sell Co.**

CRGL	
FPL	
KET	
PLK	
KET	
KET	
APC	
FPL	
OKE	
OKE	

**Cogen**

As-available	
Firm	
Orange Co	
Wheeled	

**Interruptible  
DSM**

--

Note: Tampa Electric does not have a marginal cost estimate associated with interruptible and DSM.

01/10/2001  
 HE 8:00

Output  
 MWH

Marginal  
 Cost

**Generating Unit**

BB 1	
BB 2	
BB 3	
BB 4	
BBP1	
BBP2	
BBP3	
GA 1	
GA 2	
GA 3	
GA 4	
GA 5	
GA 6	
HCC1	
HCC2	
HDCT 2B	
HP 1	
HP 2	
HP 3	
HP 4	
HP 5	
PH 1	
PH 2	
PKCT	
POLK	
PSCOT	

**Wholesale Energy Purchases**

Sell Co.

APC	
CRGL	
FPL	
KET	
PLK	
KET	
KET	
APC	
FPL	
OKE	
OKE	

**Cogen**

As-available	
Firm	
Orange Co	
Wheeled	

Interruptible  
 DSM

--

Note: Tampa Electric does not have a marginal cost estimate associated with interruptible and DSM.

08/17/2001  
HE 15:00

PAGE 1 OF 11

Generating Unit	Output MWH	Marginal Cost
BB 1		
BB 2		
BB 3		
BB 4		
BBP1		
BBP2		
BBP3		
GA 1		
GA 2		
GA 3		
GA 4		
GA 5		
GA 6		
HCC1		
HCC2		
HDCT 2B		
HP DG		
HP 1		
HP 2		
HP 3		
HP 4		
HP 5		
PH 1		
PH 2		
PKCT		
POLK		
PSCT		

**Wholesale Energy Purchases**

Sell Co.	Output MWH	Marginal Cost
POU		
DETM		
EKT		
PLK		
TEA		
DETM		
TEA		
APC		
POU		

Cogen	Output MWH	Marginal Cost
As-available		
Firm		
Orange Co		
Wheeled		

Interruptible	Output MWH	Marginal Cost
DSM		

Note: Tampa Electric does not have a marginal cost estimate associated with interruptible and DSM.

08/28/2001  
16:00

Output  
MWH

Marginal  
Cost

**Generating Unit**

BB 1	
BB 2	
BB 3	
BB 4	
BBP1	
BBP2	
BBP3	
GA 1	
GA 2	
GA 3	
GA 4	
GA 5	
GA 6	
HCC1	
HCC2	
HDCT 2B	
HP DG	
HP 1	
HP 2	
HP 3	
HP 4	
HP 5	
PH 1	
PH 2	
PKCT	
POLK	
PSCT	

**Wholesale Energy Purchases**

Sell Co.

FPL	
APC	
COR	
EKT	
FPL	
COR	
EKT	
TEA	
APC	
COR	
FPL	
POU	

**Cogen**

As-available	
Firm	
Orange Co	
Wheeled	

Interruptible  
DSM

--

Note: Tampa Electric does not have a marginal cost estimate associated with interruptible and DSM.

08/28/2001  
17:00

PAGE 9 OF 11

Output  
MWH      Marginal  
            Cost

**Generating Unit**

BB 1	
BB 2	
BB 3	
BB 4	
BBP1	
BBP1	
BBP3	
GA 1	
GA 2	
GA 3	
GA 4	
GA 5	
GA 6	
HCC1	
HCC2	
HDCT 2B	
HP DG	
HP 1	
HP 2	
HP 3	
HP 4	
HP 5	
PH 1	
PH 2	
PKCT	
POLK	
PSCT	

**Wholesale Energy Purchases**

Sell Co.

FPL	
APC	
COR	
EKT	
FPL	
COR	
EKT	
TEA	
APC	
COR	
FPL	
POU	

**Cogen**

As-available	
Firm	
Orange Co	
Wheeled	

**Interruptible  
DSM**

--

Note: Tampa Electric does not have a marginal cost estimate associated with interruptible and DSM.



08/29/2001  
15:00

Output  
MWH

Marginal  
Cost

**Generating Unit**

BB 1	
BB 2	
BB 3	
BB 4	
BBP1	
BBP2	
BBP3	
GA 1	
GA 2	
GA 3	
GA 4	
GA 5	
GA 6	
HCC1	
HCC2	
HDCT 2B	
HP DG	
HP 1	
HP 2	
HP 3	
HP 4	
HP 5	
PH 1	
PH 2	
PKCT	
POLK	
PSCT	

**Wholesale Energy Purchases**

Sell Co.

FPC	
DETM	
APC	
TAL	
RES	
OKE	
FPL	
RES	

**Cogen**

As-available	
Firm	
Orange Co	
Wheeled	

Interruptible	
DSM	

Note: Tampa Electric does not have a marginal cost estimate associated with interruptible and DSM.

08/29/2001  
16:00

Output  
MWH                      Marginal  
   Cost

**Generating Unit**

BB 1	
BB 2	
BB 3	
BB 4	
BBP1	
BBP2	
BBP3	
GA 1	
GA 2	
GA 3	
GA 4	
GA 5	
GA 6	
HCC1	
HCC2	
HDCT 2B	
HP DG	
HP 1	
HP 2	
HP 3	
HP 4	
HP 5	
PH 1	
PH 2	
PKCT	
POLK	
PSCT	

**Wholesale Energy Purchases**

Sell Co.

FPC	
DETM	
APC	
TAL	
RES	
OKE	
FPL	
FPC	
RES	

**Cogen**

As-available	
Firm	
Orange Co	
Wheeled	

Interruptible  
DSM

--

Note: Tampa Electric does not have a marginal cost estimate associated with interruptible and DSM.

TAMPA ELECTRIC COMPANY  
DOCKET NO. 020001-EI  
STAFF'S 1<sup>ST</sup> SET OF INTERROGATORIES  
INTERROGATORY NO. 25  
PAGE 1 OF 2  
FILED: SEPTEMBER 30, 2002

25. Please provide the information necessary to complete the following table.

Fuel Costs Eligible for Recovery through Fuel Clause per Order No. 14546				
(\$000)	2000	2001	2002	2003
Invoice fuel price, including any revisions				
Quality and/or quantity adjustments to invoice price				
Transportation charges to utility system				
Federal and state taxes				
Purchasing agents' commissions				
Port charges				
Independent quantity and/or quality inspections				
Additives blended with fuel prior to burning or injected into the boiler firing chamber with fuel				
Inventory adjustments due to volume and/or price adjustments				
TOTAL				

A. The following table contains the requested information. Since the information requested is based on invoice information rather than consumption, the totals shown here will not equal the totals shown on Tampa Electric's A or E fuel schedules.

**TAMPA ELECTRIC COMPANY**  
**DOCKET NO. 020001-EI**  
**STAFF'S 1<sup>ST</sup> SET OF INTERROGATORIES**  
**INTERROGATORY NO. 25**  
**PAGE 2 OF 2**  
**FILED: SEPTEMBER 30, 2002**

<b>Fuel Costs Eligible for Recovery through Fuel Clause per Order No. 14546</b>				
(\$000)	2000	2001	2002	2003 (3)
Invoice fuel price, including any revisions	██████████	██████████	██████████	██████████
Quality and/or quantity adjustments to invoice price	██████████	██████████	██████████	██████████
Transportation charges to utility system	██████████ (2)	██████████ (2)	██████████ (2)	██████████ (2)
Federal and state taxes	(1) & (2)	(1) & (2)	(1) & (2)	(1) & (2)
Purchasing agents' commissions	██████████	██████████	██████████	██████████
Port charges	██████████	██████████	██████████	██████████
Independent quantity and/or quality inspections	██████████	██████████	██████████	██████████
Additives blended with fuel prior to burning or injected into the boiler firing chamber with fuel	██████████	██████████	██████████	██████████
Inventory adjustments due to volume and/or price adjustments	██████████	██████████	██████████	██████████
<b>TOTAL</b>	<b>343,966</b>	<b>376,939</b>	<b>409,492</b>	<b>71,135</b>

**Notes:**

- (1) Fuels used to run power plants are exempt from state sales tax.
- (2) Taxes may be embedded in the price charged by vendors for transportation of fuel.
- (3) 2003 projection values are preliminary.