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April 16, 2021

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

Re: Docket 20210034-EI, Petition for Rate Increase by Tampa Electric Company

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 Protective Order of certain information contained in the company's Updated Cost of Service Workpapers and Supplemental Opt Out Study Volume II of III.

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

Thank you for your assistance in connection with this matter.

Sincerely,



Malcolm N. Means

MNM/bmp

Enclosure

cc: Richard Gentry, Public Counsel (w/encl.)
Jon Moyle, FIPUG (w/encl.)

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Tampa Electric Company)
for an increase in its base rates and service)
charges and other relief)
_____)

DOCKET NO. 20210034-EI

FILED: April 16, 2021

**TAMPA ELECTRIC COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND REQUEST 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 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 April 9, 2021, Tampa Electric filed its Petition, direct testimony, and minimum filing requirements ("MFR") in this matter. The information for which confidential treatment is requested is highlighted in yellow on Bates numbered pages 181 and 184 of the company's Updated Cost of Service Workpapers and Supplemental Opt Out Study, Volume II of III. 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)(c)-(f), Fla. Stat. The Confidential Information that is the subject of this request and motion falls within 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. Attached hereto as Exhibit "B" are two public versions of the Documents with the Confidential Information redacted, unless previously filed as indicated.

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.

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)(a) of the Florida Administrative Code.

Requested Duration of Confidential Classification

6. 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 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 18 months. 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 16th day of April, 2021.

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 Motion, filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 16th day of April, 2021 to the following:

Charles Murphy
Gabriella Passidomo
Theresa Tan
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- ATTORNEY

JUSTIFICATION FOR CONFIDENTIAL TREATMENT

| <u>Document</u> | <u>Bates Page</u> | <u>Column</u> | <u>Rows</u> | <u>Rationale</u> |
|---|-----------------------|---|-------------------------|------------------|
| Updated Cost of Service Workpapers and Supplemental Opt Out Study Volume II of III | 181 | Rate | Monthly Meter Reading | (1) |
| | | | Off-Cycle Meter Reading | |
| | | Unit Cost | Monthly Meter Reading | (1) |
| | | | Off-Cycle Meter Reading | |
| | | Annual Cost | Monthly Meter Reading | (1) |
| | | | Off-Cycle Meter Reading | |
| | 184 ¹ | Customer Service Professional | Annual Job Value | (1) |
| | | | Hourly Rate | |
| | | | Total Hourly | |
| | | | Previous Hourly Rates | |
| | | Billing Specialist | Annual Job Value | (1) |
| | | | Hourly Rate | |
| | | | Total Hourly | |
| | | | Previous Hourly Rates | |
| | | Meter Field Rep (Union) | Annual Job Value | (1) |
| | | | Hourly Rate | |
| | | | Total Hourly | |
| | | | Previous Hourly Rates | |
| | | Planner Dispatcher (re-route- field) | Annual Job Value | (1) |
| | | | Hourly Rate | |
| Total Hourly | | | | |
| Previous Hourly Rates | | | | |
| Meter Field Rep (Reads) (Union) | | Annual Job Value | (1) | |
| | | Hourly Rate | | |
| | Total Hourly | | | |
| | Previous Hourly Rates | | | |
| IT Developer (Contractor) | Annual Job Value | (1) | | |
| | Hourly Rate | | | |
| | Total Hourly | | | |

(1) This information is derived from Tampa Electric employee salary and labor rates. Public disclosure of this information would impair the company's business interests by adversely affecting the company's hiring and retention of employees.

¹ This document was previously produced in the version of MFR Schedule E, Cost of Service Study, Volume II that was filed on April 9, 2021. That version of the document was incomplete, so this page is included here as a part of the complete Opt Out Study. The only change to this page is that it is now Bates numbered page 184 instead of 40.

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 _____

Public Version(s) of the Document(s) previously filed on April 16, 2021