## Ausley & McMullen

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April 21, 2021

#### **HAND DELIVERED**

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 Supplemental Opt Out Study in Excel format.

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	)	DOCKET NO. 20210034-EI
charges and other relief	)	
		FILED: April 21, 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 16, 2021, Tampa Electric filed paper copies of its Petition, direct testimony, and minimum filing requirements ("MFR") in this matter. One of the workpapers supporting the company's MFRs is the company's Supplemental Opt Out Study. Tampa Electric previously submitted a request for confidential classification and a request for a temporary protective order for the confidential portions of the paper Supplemental Opt Out Study filed on April 16, 2021. *See* Document No. 03530-2021. For the Commission's convenience, Tampa Electric is now filing this study in Excel file format. The information for which confidential treatment is requested is highlighted in yellow on the Excel version of the Supplemental Opt Out Study. 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 21st day of April, 2021.

Respectfully submitted,

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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

ulm N. Means

#### **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 21<sup>st</sup> day of April, 2021 to the following:

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Gabriella Passidomo
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In N. Means

ATTORNEY

#### JUSTIFICATION FOR CONFIDENTIAL TREATMENT

Document	Tab	Column	Rows	Rationale
Meteri		Rate	Monthly Meter Reading	
	Metering		Off-Cycle Meter Reading	(1)
Services - Ongoing	Unit Cost	Monthly Meter Reading	(1)	
		Off-Cycle Meter Reading		
	Anı	Annual Cost	Monthly Meter Reading	(1)
		Annual Cost	Off-Cycle Meter Reading	
		Customer Service Professional	Annual Job Value	(1)
			Hourly Rate	
			Total Hourly	
		Piolessional	Previous Hourly Rates	
		Billing	Annual Job Value	(1)
			Hourly Rate	
	Specialist	Total Hourly	(1)	
E_Vol IIofIII (Opt-	E_Vol IIofIII (Opt- Out) CONF		Previous Hourly Rates	
Out) CONF			Annual Job Value	
	Meter Field	Hourly Rate	(1)	
	Labor	Rep (Union)	Total Hourly	
Rates		Previous Hourly Rates		
	Planner	Annual Job Value	nual Job Value	
		Dispatcher	Hourly Rate	(1)
		(re-route-	Total Hourly	
	field)	Previous Hourly Rates		
	Meter Field	Annual Job Value		
	Rep	Hourly Rate	(1)	
		(Reads)	Total Hourly	
		(Union)	Previous Hourly Rates	
		IT Developer	Annual Job Value	(1)
		(Contractor)	Hourly Rate	
		(Contractor)	Total Hourly	

<sup>(1)</sup> 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.

### 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