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April 8, 2026

VIA ELECTRONIC FILING

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

Re: Docket No. 20260053-EI
Review of the 2024-2025 outage of Tampa Electric Company's Bayside
Steam Turbine Unit 2

Dear Mr. Teitzman:

Attached for filing in the above docket is Tampa Electric Company's Motion for Temporary Protective Order pertaining to its response to Office of Public Counsel's Second Request for Production of Documents (Nos. 3-11).

Thank you for your assistance in connection with this matter.

Sincerely,

A handwritten signature in blue ink that reads 'Malcolm N. Means'.

Malcolm N. Means

MNM/bml
Attachment

cc: All parties of record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of the 2024-2025 outage of
Tampa Electric Company's Bayside
Steam Turbine Unit 2

DOCKET NO. 20260053-EI

FILED: April 8, 2026

**TAMPA ELECTRIC COMPANY'S
MOTION FOR TEMPORARY PROTECTIVE ORDER**

Tampa Electric Company ("Tampa Electric" or the "company"), pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, hereby requests that the Florida Public Service Commission ("Commission") issue a temporary protective order exempting from Section 119.07(1), Florida Statutes, certain information specified herein as requested by the Office of Public Counsel ("OPC") through discovery, and for the protection of that information against public disclosure pending OPC's review of it. In support of its Motion, the company states:

1. On March 5, 2026, OPC served on Tampa Electric its Second Request for Production of Documents (Nos. 3-11) ("OPC's Discovery Request") in Docket No. 20260001-EI (the "Fuel Clause") which consisted of requests solely related to the unplanned outage at Tampa Electric's Bayside Unit 2 in 2024 and 2025 (the "Outage").

2. On March 23, 2026, Tampa Electric and OPC filed a joint motion to spin off the replacement power issues related to the Outage. (DN 0172-2026) On April 1, 2026, the Commission granted Tampa Electric and OPC's joint motion through Order No. PSC-2026-0081-PCO-EI issued in Docket No. 20260001-EI.

3. On this date, Tampa Electric has served its responses to OPC's Discovery Request by posting its responses and responsive documents (collectively "Response") on a virtual SharePoint site that is accessible by OPC. The company believes that portions of

its Response to the discovery requests specified on Exhibit A constitute “proprietary confidential business information” and has designated them as such by placing them in a segregated area of the SharePoint site for confidential information.

4. Tampa Electric considers the designated information in its Response to be “proprietary confidential business information” that is entitled to protection against public disclosure pursuant to Section 366.093, Florida Statutes.

5. 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)(a)-(f), Florida Statutes. The confidential information that is the subject of this Motion falls within one or more of these statutory categories and, thus, constitutes proprietary confidential business information.

6. Exhibit A identifies OPC’s Discovery Request to which the company’s Response is considered confidential.

7. Public disclosure of the highlighted information in question would adversely affect the economic interests of Tampa Electric and its customers.

8. Rule 25-22.006, Florida Administrative Code, provides for protection of this type of information when a utility allows OPC to inspect or take possession of such information in the course of discovery. Subsection (6)(c) of this rule states:

(c) When a utility or other person agrees to allow Public Counsel to inspect or take possession of utility information for the purpose of determining what information is to be used in a proceeding before the Commission, the utility may request a temporary protective order exempting the information from Section 119.07(1), F.S. If the information is to be used in a proceeding before the Commission, then the utility must file a specific request for a protective order under paragraph (a) above. If the information is not to be used in a proceeding before the Commission, then Public Counsel shall return the information to the utility in accordance with the record retention requirements of the Department of State.

9. Tampa Electric requests a temporary protective order to allow OPC access to Tampa Electric's confidential information that is posted on the SharePoint site as part of its Response while protecting the economic interests of Tampa Electric and its customers from the harm that would result from public disclosure of the above-referenced confidential information.

10. Tampa Electric maintains the highlighted information in a confidential form and has not disclosed it publicly.

WHEREFORE, Tampa Electric requests that the Commission issue a Temporary Protective Order allowing it to provide OPC with the confidential information described above while maintaining the confidential nature of that information.

DATED this 8th day of April 2026.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

EXHIBIT A

OPC's 2nd Request for Production (3-11)

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| <p>3. Forced Outages. Please provide all emails exchanged between Tampa Electric and GE Vernova regarding the Tampa Electric's Bayside natural gas combined cycle power plant Unit 2 steam turbine generator damages that led to the October 1, 2024, unit trip and subsequent repair outage. Include the following documents:</p> <ul style="list-style-type: none">a. All emails between Tampa Electric and GE Vernova.b. All reports, including drafts, provided by GE Vernova, unredacted.c. All Tampa Electric internal correspondence. |
| <p>4. Forced Outages. Please provide all emails exchanged between Tampa Electric and Entrust Solutions Group and/or TG Advisors regarding the Tampa Electric's Bayside natural gas combined cycle power plant Unit 2 steam turbine generator damages that led to the October 1, 2024, unit trip and subsequent repair outage.</p> <ul style="list-style-type: none">a. All emails between Tampa Electric and Entrust Solutions Group and/or TG Advisors.b. All reports, including drafts, provided by Entrust Solutions Group and/or TG Advisors, unredacted.c. All Tampa Electric internal correspondence. |
| <p>5. Forced Outages. Please provide copies of all procedures and documentation used during Tampa Electric's Bayside Unit 2 Spring 2024 outage related to the steam turbine alignment, including the following:</p> <ul style="list-style-type: none">a. All Tampa Electric internal procedures.c. All measurements of the final turbine alignment.g. All Tampa Electric correspondence regarding the alignment.k. Any documents defining the allowable tolerances for the final alignment. |
| <p>6. Forced Outages. Please provide copies of all procedures and documentation used during the Tampa Electric Bayside Unit 2 Spring 2024 outage related to the steam turbine rotor bowing, including the following:</p> <ul style="list-style-type: none">a. All Tampa Electric internal procedures.e. Any drawings which indicate proper rotor bowing measurements and/or adjustments.g. All Tampa Electric correspondence regarding the rotor bowing. |
| <p>7. Forced Outages. Please describe all work performed on the Bayside Unit 2 steam turbine governor valves/LVDT. Provide the following information:</p> |

<p>a. All procedures governing the work on the steam turbine governor valves/LVDT.</p>
<p>8. Forced Outages. Please describe how the control system for the steam turbine governor valves/LVDT and how the valve position of each steam turbine governor valves/LVDT is correct. Include the following information:</p> <p>b. Pictures of control room, control system information on valve position available to control room operators.</p> <p>d. Provide all correspondence regarding the steam turbine governor valves/LVDT during and subsequent to the Spring 2024 outage.</p>
<p>9. Forced Outages. Provide all control system data logs regarding the steam turbine, governor valves and steam entering the HPIP steam turbine, during each of the 12 turbine startups, in Excel spreadsheet, identified in Entrust Solutions Group and/or TG Advisors, June 13, 2025, Final Report, page 5 (document page 76). Please provide data using the minimum recording time for each data point and include time scale. Include the following:</p> <p>b. The location the measurement is taken on the steam turbine component and/or steam flow path.</p> <p>e. Provide accuracy of each data point.</p> <p>f. Provide information regarding the instrument performing the measurement, including make, model, and manufacturer.</p>

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Temporary Protective Order, filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 8th day of April, 2026 to the following:

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