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March 13, 2019

**VIA: ELECTRONIC FILING**

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

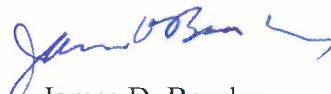
Re: Petition for recovery of costs associated with named tropical systems during the 2015, 2016 and 2017 hurricane seasons and replenishment of storm reserve subject to final true-up, by Tampa Electric Company  
FPSC Docket No. 20170271-EI

Dear Mr. Teitzman:

Attached for filing in the above docket is Tampa Electric Company's Motion for a Temporary Protective Order regarding its response to Office of Public Counsel's Seventh Request for Production of Documents (No. 19), propounded and served by electronic mail on February 26, 2019.

Thank you for your assistance in connection with this matter.

Sincerely,

  
James D. Beasley

JDB/pp  
Attachment

cc: All parties of record (w/attachment)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Tampa Electric Company )  
for Recovery of Costs Associated with )  
Named Tropical Systems and )  
Replenishment of Storm Reserve )  
\_\_\_\_\_ )

DOCKET NO. 20170271-EI

FILED: March 13, 2019

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

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Rule 25.22.006(6)(c), Florida Administrative Code, hereby moves the Commission for entry of a temporary protective order exempting from Section 119.07(1), Florida Statutes, certain information 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 says:

1. On this date Tampa Electric Company has served its response to the Office of Public Counsel's Seventh Request for Production of Documents (No. 19) and has produced documents to the Office of Public Counsel as set forth in the Response and as reflected on the attached Exhibit "A." Tampa Electric considers all of the information contained on the CD to constitute proprietary confidential business information which is entitled to protection against public disclosure pursuant to Section 366.093, Florida Statutes, in that they contain, among other things:

(d) 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. (Section 366.093(3)(d) and (e), Florida Statutes)

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

3. Rule 25-22.006, Florida Administrative Code, provides for protection of this type of information when a utility allows Public Counsel 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.

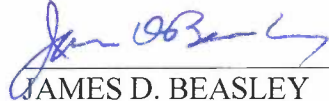
4. Tampa Electric requests a temporary protective order in order to allow OPC access to the information in question and at the same time protect the economic interests of Tampa Electric and its customers from the harm that would result from public disclosure of the above-referenced confidential information.

5. Tampa Electric is prepared to furnish OPC access to the information in question. The company maintains the information in question is in a confidential form and has not disclosed it publicly.

WHEREFORE, Tampa Electric moves the Commission for entry of a Temporary Protective Order allowing it to provide OPC the confidential information contained in the above-referenced CD while maintaining the confidential nature of that information.

DATED this 13th day of March 2019.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

19. Please provide copies of all contracts, agreement, purchase orders, work orders, and all other agreements or documents that show the rates for any embedded vendor's crew that worked for you at any time or in any capacity during 2014, 2015, 2016, 2017, and 2018. The term "embedded vendor" means a vendor providing storm restoration and repair crews, transmission repair, restoration and construction crews, and vegetation management crews, and which vendor also performs similar or additional types of services for you in non-storm restoration (non-emergency) condition on a year-round basis.
- A. Tampa Electric is providing the requested confidential contracts, agreements, purchase orders, work orders, and any other agreements or documents that show the rates for any embedded vendor's crew that worked for Tampa Electric at any time or in any capacity during 2014, 2015, 2016, 2017 and 2018 on a confidential CD, subject to the above-referenced Motion for Temporary Protective Order.

Exhibit "A"

**CERTIFICATE OF SERVICE**

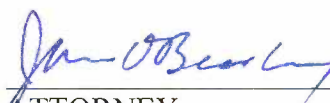
I HEREBY CERTIFY that a true and correct copy of the foregoing Motion for Temporary Protective Order, filed on behalf of Tampa Electric Company, has been served by electronic mail on this 13th day of March, 2019 to the following:

Ms. Suzanne Brownless  
Ms. Johana Nieves  
Mr. Kurt Schrader  
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ATTORNEY