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May 31, 2022

**VIA: ELECTRONIC FILING**

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

Re: Storm Protection Plan Cost Recovery Clause  
FPSC Docket No. 20220010-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 Citizens' First Set of Interrogatories (Nos. 1-33) and First Request for Production (No. 1), propounded and served by electronic mail on April 30, 2022.

Thank you for your assistance in connection with this matter.

Sincerely,



Malcolm N. Means

MNM/  
Attachment

cc: All parties of record (w/attachment)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan )  
Cost Recovery Clause )  
\_\_\_\_\_)

DOCKET NO.: 20220010-EI

FILED: May 31, 2022

**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 requests that the 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 the 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 Citizens’ First Set of Interrogatories (Nos. 1-33) and First Request for Production of Documents (No. 1) (“OPC Discovery Requests”) by serving its answers, responses, and responsive documents (collectively “Response”) to OPC. The company believes that all or portions of its Response specified on Exhibit “A” constitute “proprietary confidential business information,” and has designated it as such by (1) labeling it as such and (2) providing it in a separate electronic folder for confidential information. 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, because it reflects information in one or more of these categories:

- (c) Security measures, systems, or procedures.

(d) Information concerning bids or other contractual data, 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)(c)(d) and (e), Florida Statutes)

2. Public disclosure of the designated 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 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.

4. Tampa Electric requests a temporary protective order in order to allow OPC access to the designated confidential information 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. Tampa Electric will work cooperatively with the parties to this proceeding to identify confidential information to be used at the final hearing in this docket and to request confidential classification as specified in the rule. To the extent that prefiling of confidential documents is required, Tampa Electric commits to work with the other parties to develop a process to maintain both confidentiality of the information and

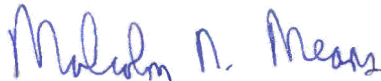
preservation of the litigation rights of the respective parties consistent with Commission precedent. Tampa Electric believes that the efficiency underlying this arrangement is not expected to require the closure of public access to hearings and will vigorously preserve confidentiality in accordance with applicable law while taking all reasonable steps to accomplish necessary litigation in a manner that does not require closure of hearings.

5. Tampa Electric maintains the highlighted information produced to OPC in response to OPC's requests 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 31st day of May 2022.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

**Exhibit A**

<b>OPC'S Third Set of Interrogatories</b>		
<b>Interrogatory</b>	<b>Electronic File Names</b>	<b>Description</b>
<p>5. Please identify all detail/design for construction documents used for construction for the following LUG projects. If the project is still in the design phase, please state as such.</p> <p>a. LUG PCA 13785.92466250  b. LUG CSA 13592.10402259  c. LUG WSA 14032.10820614  d. LUG WSA 13673.10277744  e. LUG WHA 13118.92612349  f. LUG PCA 13724.10671319  g. LUG WHA 13297.10560432  h. LUG WSA 13428.91540495  i. LUG CSA 13835.60131429  j. LUG PCA 13390.92599119</p>	<p>(BS_7) Question (5) d. LUG WSA 13673.10277744.pdf  (BS_8) Question (5) a. LUG PCA 13785.92466250.pdf  (BS_9) Question (5) b. LUG CSA 13592.10402259.pdf  (BS_10) Question (5) c. LUG WSA 14032.10820614 (003).pdf  (BS_11) Question (5) e. LUG WHA 13118.92612349.pdf  (BS_12) Question (5) g. LUG WHA 13297.10560432.pdf  (BS_13) Question (5) h. LUG WSA 13428.91540495.pdf  (BS_14) Question 5 i. LUG CSA 13835.60131429.pdf  (BS_15) Question 5. j. LUG PCA 13390.92599119.pdf</p>	<p>These items consist of construction design documents for projects undertaken as part of the company's Distribution Lateral Undergrounding Program. Tampa Electric believes that public disclosure of these design documents would pose a security risk to Tampa Electric's grid. This information is protected by Section 366.093(3)(c) of the Florida Statutes.</p>
<p>23. Regarding Distribution Hardening program on Form A-7, Circuit 13807, please provide a map of the circuit with the locations of the 70 three-phase reclosers and 84 single phase reclosers.</p>	<p>(BS_20) OPC IRR 23 13807_RECLOSERS.pdf</p>	<p>These items consist of construction documents and maps for conductor upgrade projects undertaken as part of the company's Distribution Feeder Sectionalizing and Automation efforts. Tampa Electric believes that public disclosure of these maps would pose a security risk to Tampa Electric's grid. This information is protected by Section 366.093(3)(c) of the Florida Statutes.</p>

<b>OPC'S Third Set of Interrogatories</b>		
<b>Interrogatory</b>	<b>Electronic File Names</b>	<b>Description</b>
<p>30. Referencing Mr. Plusquellic's testimony, page 6, lines 18-21, which reference a separate warehouse to facilitate the necessary supporting material issue needed for this program, please provide the following information:</p> <p>a. Identify all correspondence, memos, reports, etc. that determined that a separate warehouse was necessary for implementing the Storm Hardening Plan.</p> <p>b. Describe how physically separate warehouses are used in each of TECO's operating districts.</p> <p>c. Describe how labor for procurement and handling of material is tracked for the Storm Hardening Plan.</p> <p>d. Explain how accounting for minor materials (nuts, bolts, etc.) is affected by the separate warehouse.</p> <p>e. Identify the total stores cost in 2021 for the separate warehouse for the SPP.</p> <p>f. Identify the total 2021 overhead stores cost as a percentage for the separate warehouse.</p> <p>g. Identify the overhead stores costs as a percentage for Tampa Electric for 2016-2022 for materials not in the separate warehouse.</p>	<p>(BS_22) Copy of Warehouse Payment Schedule.xlsx            (BS_23) PSA Form-SPP.docx            (BS_24) RE TECO SPP Warehouse Laydown Yard Opportunities.msg            (BS_25) TECO Executed Lease 5309 Hartford-TEC Signed.pdf            (BS_26) TECO TI Budget 5309 Hartford-Revised 11.19.20.pdf</p>	<p>These documents contain confidential contractual pricing data. Disclosure of this information would impair Tampa Electric's ability to contract for similar goods and services on favorable terms in the future. Disclosure of this information would also impair the competitive business of the provider of the information. As a result, this information is protected by Section 366.093(3)(d) and (3) of the Florida Statutes.</p>
<p>32. Regarding contracted engineering services, for each of the programs included in the SPPCRC, please provide the following:</p> <p>a. contracted hourly rates by position/job title.</p> <p>b. specific milestones in the engineering service contracts</p> <p>c. a description of Tampa Electric's project management of contracted engineering.</p>	<p>(BS_27) Agreement 19-00268 Lineworks Engineering Design Rate Schedule.pdf            (BS_28) Outsourced Design Pricing Schedules.Enercon.xlsx            (BS_29) Outsourced Design Pricing Schedules.Fishel.xlsx            (BS_30) Outsourced Design Pricing Schedules.Leidos.xlsx            (BS_31) Updated 6.5.20 Pike-Outsourced Design Pricing Schedules.Pike Engineering.xlsx</p>	<p>These documents contain confidential contractual pricing data. Disclosure of this information would impair Tampa Electric's ability to contract for similar goods and services on favorable terms in the future. Disclosure of this information would also impair the competitive business of the provider of the information. As a result, this information is protected by Section 366.093(3)(d) and (3) of the Florida Statutes.</p>

<b>OPC's Third Request for Production</b>		
<b>Request</b>	<b>Electronic File Names</b>	<b>Description</b>
1. Please provide all documents identified in your responses to Citizens' First Set of Interrogatories to Tampa Electric Company (1-33).	See file names above.	See justifications above. The files identified under each Interrogatory listed above were produced to OPC in response to this Request for Production.

## 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 31<sup>st</sup> day of May to the following:

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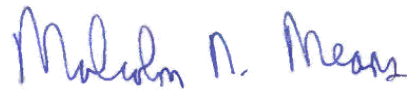
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