

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase by Tampa Electric Company

DOCKET NO. 20240026-EI

In re: Petition for approval of 2023 Depreciation and Dismantlement Study, by Tampa Electric Company

DOCKET NO. 20230139-EI

In re: Petition to implement 2024 Generation Base Rate Adjustment provisions in Paragraph 4 of the 2021 Stipulation and Settlement Agreement, by Tampa Electric Company

DOCKET NO. 20230090-EI

FILED: May 3, 2024

**TAMPA ELECTRIC COMPANY'S
NOTICE OF INTENT TO
REQUEST CONFIDENTIAL CLASSIFICATION**

Tampa Electric Company ("Tampa Electric" or the "company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006(3)(a), Florida Administrative Code, hereby files this Notice of Intent to Request Confidential Classification for portions of Citizens' Tenth Set of Interrogatories (Nos. 174-186) ("Tenth Set"). Some of the interrogatories in the Tenth Set seek information about, are based on, or derived from confidential information provided by Tampa Electric to OPC during the discovery process and for which TEC has filed a request for confidential classification. Accordingly, portions of the individual interrogatories contained in the Tenth Set constitute "proprietary confidential business information" as defined in Section 366.093, Florida Statutes.

OPC has served a confidential copy of the Tenth Set on the non-staff parties by having Tampa Electric post the document in the confidential portion of its Consumer Party Discovery Website. OPC is serving the Tenth Set on Staff Counsel by Tampa Electric filing the Tenth Set document under a separate, confidential cover subject to this Notice of Intent.

The purpose of this Notice of Intent is to give staff access to the Tenth Set without delay and so Tampa Electric can carefully review the Tenth Set to identify the “proprietary confidential business information” so Tampa Electric can prepare and file a request for confidential classification carefully tailored to identify all and only the confidential information in the Tenth Set.

Pursuant to Rule 25-22.006(3)(a) and (d), Florida Administrative Code, Tampa Electric respectfully requests confidential handling of the material identified in Exhibit A, which is comprised of the Tenth Set, i.e., Citizens’ Tenth Set of Interrogatories (Nos. 174-186), while the company reviews that material, identifies which components constitute proprietary confidential business information, and prepares a Request for Confidential Classification. Tampa Electric will file such a Request specifying the information entitled to confidential treatment within twenty-one days in accordance with Rule 25-22.006(3)(a)1, Florida Administrative Code.

DATED this 3rd day of May 2024.

Respectfully submitted,



J. JEFFRY WAHLEN
jwahlen@ausley.com
MALCOLM N. MEANS
mmeans@ausley.com
VIRGINIA L. PONDER
vponder@ausley.com
Ausley McMullen
Post Office Box 391
Tallahassee, Florida 32302
(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

EXHIBIT A

OPC's 10th Set of Interrogatories (174-186)

Interrogatory No. 177 a-e (pages 5-6)

Interrogatory No. 178 (page 7)

Interrogatory No. 180 (pages 8 – 9)

Interrogatory No. 181 chart and a-f (pages 9 – 12)

Interrogatory No. 182 a and b (pages 12-13)

Interrogatory No. 183 a, d, e (pages 13-14)

Interrogatory No. 184 a, c, d (pages 14-15)

Interrogatory No. 185 a, c, d (pages 15-17)

Interrogatory No. 186 a-c, e- h (pages 17-18)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Intent, filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 3rd day of May, 2024 to the following:

Adria Harper
Carlos Marquez
Timothy Sparks
Daniel Dose
Florida Public Service Commission/OGC
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
aharper@psc.state.fl.us
cmarquez@psc.state.fl.us
tsparks@psc.state.fl.us
ddose@psc.state.fl.us
discovery-gcl@psc.state.fl.us

Walt Trierweiler
Patricia Christensen
Octavio Ponce
Charles Rehwinkel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
trierweiler.walt@leg.state.fl.us
christensen.patty@leg.state.fl.us
ponce.octavio@leg.state.fl.us
Rehwinkel.Charles@leg.state.fl.us

Bradley Marshall
Jordan Luebke
Earthjustice
111 S. Martin Luther King Jr. Blvd.
Tallahassee, FL 32301
bmarshall@earthjustice.org
jluebke@earthjustice.org

Nihal Shrinath
2101 Webster Street, Suite 1300
Oakland, CA 94612
nihal.shrinath@sierraclub.org

Jon Moyle
Karen Putnal
c/o Moyle Law Firm
118 N. Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com
mqualls@moylelaw.com

Leslie R. Newton, Maj. USAF
Ashley N. George, Capt. USAF
AFLOA/JAOE-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
Leslie.Newton.1@us.af.mil
Ashley.George.4@us.af.mil

Thomas A. Jernigan
AFCEC/JA-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
thomas.jernigan.3@us.af.mil

Ebony M. Payton
AFCEC-CN-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
Ebony.Payton.ctr@us.af.mil

Mr. Robert Scheffel Wright
John LaVia, III
Gardner, Bist, Wiener, Wadsworth, Bowden,
Bush, Dee, LaVia & Wright, P.A.
1300 Thomaswood Drive
Tallahassee, FL 32308
shef@gbwlegal.com
jlavia@gbwlegal.com

Sari Amiel
Sierra Club
50 F. Street NW, Eighth Floor
Washington, DC 20001
sari.amiel@sierraclub.org

Hema Lochan
Earthjustice
48 Wall St., 15th Fl
New York, NY 10005
(212) 284-8021
hlochan@earthjustice.org
flcaseupdates@earthjustice.org



ATTORNEY