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ORIGINAL
FILE COPY

September 13, 1996

HAND DELIVERED

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Fuel and Purchased Power Cost Recovery Clause
and Generating Performance Incentive Factor
FPSC Docket No. 960001-EI

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and ten (10) copies of Tampa Electric Company's Request for Specified Confidential Treatment of portions of Forms 423-1(a), 423-2, 423-2(a), 423-2(b) and 423-2(c) for the month of July 1996.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,


James D. Beasley

JDB/pp
Enclosures

cc: All Parties of Record (w/enc.)

- ACK _____
- AFA _____
- APP _____
- CAT _____
- CMR _____
- CTP _____
- EAG _____
- LEP _____
- LRP _____
- GRP _____
- REI _____
- SEC _____
- WAS _____
- OTH _____

DOCUMENT NUMBER-DATE

09767 SEP 13 96

FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power)
Cost Recovery Clause and) DOCKET NO. 960001-EI
Generating Performance Incentive) FILED: September 13, 1996
Factor.)
_____)

TAMPA ELECTRIC COMPANY'S
REQUEST FOR SPECIFIED CONFIDENTIAL TREATMENT

Pursuant to §366.093, Fla. Stat., Tampa Electric Company ("Tampa Electric" or "the company") submits the following Request for Specified Confidential Treatment of the company's Forms 423-1(a), 423-2, 423-2(a), 423-2(b) and 423-2(c) for the month of July 1996:

1. Attached hereto as Exhibit "A" is a detailed justification for the requested confidential treatment of the highlighted portions of Tampa Electric's 423 Forms for the month of July 1996.

2. Tampa Electric requests that the information for which Tampa Electric seeks confidential classification not be declassified until the dates specified in Exhibit "B" to this request. The time periods requested are necessary to allow Tampa Electric's affiliated companies to negotiate future contracts without their competitors (and other Customers) having access to information which would adversely affect the ability of these affiliates to negotiate future contracts. The period of time requested will ultimately protect Tampa Electric and its Customers.

3. The material for which classification is sought is intended to be and is treated by Tampa Electric and its affiliates

DOCUMENT NUMBER-DATE

09767 SEP 13 96


FPSC-RECORDS/REPORTING

as private and has not been disclosed.

WHEREFORE, Tampa Electric submits the foregoing as its request for confidential treatment of the information identified as Exhibit "A".

DATED this 13th day of September, 1996.

Respectfully submitted,



LEE L. WILLIS and
JAMES D. BEASLEY
Ausley & McMullen
Post Office Box 391
Tallahassee, Florida 32302
(904) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Request for Specified Confidential Treatment, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail on this 13th day of September, 1996 to the following individuals:

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Ms. Mary Elizabeth Culpepper
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Florida Public Service
Commission
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ATTORNEY

TAMPA ELECTRIC COMPANY

Docket No. 960001-EI
September, 1996

Justification for Confidentiality of July, 1996 Report:
Tampa Electric Company

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-1(a)	1 - 23 1 - 21	H	(1)
423-1(a)	1 - 23 1 - 21	I	(2)
423-1(a)	1 - 23 1 - 21	J	(2)
423-1(a)	1 - 23 1 - 21	K	(2)
423-1(a)	1 - 23 1 - 21	L	(2)
423-1(a)	1 - 23 1 - 21	M	(2), (3)
423-1(a)	1 - 23 1 - 21	N	(2), (4)
423-1(a)	1 - 23 1 - 21	O	(2)

Rationale for Confidentiality:

(1) This information is contractual information which, if made public, "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. The information shows the price which Tampa Electric has paid for No. 2 fuel oil per barrel for specific shipments from specific suppliers. This information would allow suppliers to compare an individual supplier's price with the market "for that date of delivery" and thereby determine the contract pricing formula between Tampa Electric and that supplier.

Disclosure of the invoice price would allow suppliers to determine the contract price formula of their competitors. The knowledge of each other's prices would give suppliers information with which to actually control the pricing in No.

Exhibit "A"

2 oil by either all quoting a particular price or adhering to a price offered by a major supplier. This could reduce or eliminate any opportunity for a major buyer, like Tampa Electric, to use its market presence to gain price concessions from any individual supplier. The end result is reasonably likely to be increased No. 2 fuel oil prices and, therefore, increased electric rates.

- (2) The contract data found in Columns I through O are algebraic functions of Column H. Thus, the publication of these columns together, or independently, could allow a supplier to derive the invoice price of No. 2 oil paid by Tampa Electric.
- (3) For fuel that does not meet contract requirements, Tampa Electric may reject the shipment, or accept the shipment and apply a quality adjustment. This is, in effect, a pricing term which is as important as the price itself and is therefore confidential for the reasons stated in paragraph (1) relative to price concessions.
- (4) This column is as important as H from a confidentiality standpoint because of the relatively few times that there are quality or discount adjustments. That is, Column N will equal Column H most of the time. Consequently, it needs to be protected for the same reason as set forth in paragraph (1).

Justification for Confidentiality of July, 1996 Report:
Electro-Coal Transfer Facility - Big Bend Station

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2	1 - 9	G	(1), (3)
423-2	1 - 9	H	(2)

Rationale for Confidentiality:

- (1) Disclosure of the effective purchase price "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additionally, prohibiting the purchase price would enable one to ascertain the total transportation charges by subtracting the effective purchase price from the delivered price at the transfer facility, shown in Column I. Any competitor with knowledge of the total transportation charges would be able to use that information in conjunction with the published delivered price at the Electro-Coal Transfer Facility to determine the segmented transportation costs, i.e., the separate breakdown of transportation charges for river barge transport and for deep water transportation across the Gulf of Mexico from the transfer facility to Tampa. It is this segmented transportation cost data which is proprietary and confidential. The disclosure of the segmented transportation costs would have a direct impact on Tampa Electric's future fuel and transportation contracts by informing potential bidders of current prices paid for services provided. That harm, which would flow to Tampa Electric and its Customers from such disclosure, was the subject of Prepared Direct Testimony of Mr. John R. Rowe, Jr. on behalf of Tampa Electric in Docket No. 860001-EI-D. A copy of Mr. Rowe's Direct Testimony from the September 29, 1986 hearing in that docket is attached hereto as Exhibit "A" and by reference made a part hereof.

In the Commission's Order No. 12645 issued in Docket No. 830001-EU on November 3, 1983 (In re: Investigation of Fuel Adjustment Clauses of Electric Utilities), the Commission prescribed the current 423 Form filings. In so doing, the Commission observed:

Next, we must determine whether any portion of the monthly reports should be accorded confidential treatment. We agree that certain portions of the monthly reports will contain proprietary confidential business information. However, many portions of the monthly reports will not. The proprietary information for all types of fuel is transportation. Any breakout

of transportation costs must be treated confidentially. In addition, F.O.B. mine prices for coal is proprietary in nature as is the price of fuel oil. Disclosure of separate transportation or F.O.B. mine prices would have a direct impact on a utility's future fuel and transportation contracts by informing potential bidders of current prices paid for services. Disclosure of fuel oil prices would have an indirect effect upon bidding suppliers. Suppliers would be reluctant to provide significant price concessions to an individual utility if prices were disclosed because other purchasers would seek similar concessions.

The vigorous competition discussed in Mr. Rowe's earlier testimony, as recognized by the Commission, justifies proprietary confidential treatment of the information in Column G.

- (2) The disclosure of this information "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. As was stated in (1), Columns G and H both need confidential protection because disclosure of either column will enable competitors to determine the segmented transportation charges. Accordingly, the same reasons discussed in (1) likewise apply with regard to Column H.
- (3) Disclosure of this information "would impair the efforts of Tampa Electric to contract for goods and services on favorable terms." Section 366.093(3)(d), Fla. Stat. This information would inform other potential suppliers as to the price Tampa Electric is willing to pay for coal. This would give present and potential coal suppliers information which could be harmful to Tampa Electric's interests in negotiating coal supply agreements. This is much the same as paragraph (1) under Form 423-1(a) regarding No. 2 oil suppliers.

**Justification for Confidentiality of July, 1996 Report:
Electro-Coal Transfer Facility - Big Bend Station**

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(a)	1 - 9	H	(1)
423-2(a)	1 - 9	J	(2)
423-2(a)	1 - 9	L	(3)

Rationale for Confidentiality:

- (1) If the original invoice price is made public, one can subtract the original invoice price from the publicly disclosed delivered price at the Electro-Coal Transfer Facility and thereby determine the segmented river transportation cost. Disclosure of the river transportation cost "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Electro-Coal Transfer Facility - Big Bend Station).
- (2) This information, like that contained in Column H, would enable a competitor to "back into" the segmented transportation cost using the publicly disclosed delivered price at the Electro-Coal Transfer Facility. This would be done by subtracting the base price per ton from the delivered price at Electro-Coal, thereby revealing the river barge rate. Such disclosure "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Electro-Coal Transfer Facility - Big Bend Station).
- (3) This information, if publicly disclosed, would enable a competitor to back into the segmented waterborne transportation costs using the already publicly disclosed delivered price of coal at the Electro-Coal Transfer Facility. Such disclosure "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Electro-Coal Transfer Facility - Big Bend Station).

**Justification for Confidentiality of July, 1996 Report:
Electro-Coal Transfer Facility - Big Bend Station**

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(b)	1 - 9	G	(1)
423-2(b)	1 - 9	I	(2)
423-2(b)	1 - 9	K	(3)
423-2(b)	1 - 9	L	(3)
423-2(b)	1 - 9	M	(3)
423-2(b)	1 - 9	N	(3)
423-2(b)	1 - 9	O	(3)
423-2(b)	1 - 9	P	(3)

Rationale for Confidentiality:

- (1) Disclosure of the effective purchase price in Column G "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Such disclosure would enable a competitor to "back into" the segmented transportation cost using the publicly disclosed delivered price for coal at the Electro-Coal Transfer Facility. This would be done by subtracting the effective purchase price per ton from the price per ton delivered at Electro-Coal, thereby revealing the river barge rate. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Electro-Coal Transfer Facility - Big Bend Station). Such disclosure would also adversely affect Tampa Electric's ability to negotiate future coal supply contracts.
- (2) Disclosure of the rail rate per ton would adversely affect the ability of Tampa Electric affiliate, Gatliff Coal, to negotiate favorable rail rates. Disclosure of the rail rates paid would effectively eliminate any negotiating leverage and could lead to higher rail rates. This would work to the ultimate detriment of Tampa Electric and its Customers. Accordingly, disclosure of this information "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat.
- (3) These columns contained information the disclosure of which "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d),

Fla. Stat. Each of these columns provides specific information on segmented transportation costs which are the primary objects of this request. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality for Column G on 423-2 (Electro-Coal Transfer Facility - Big Bend Station).

Justification for Confidentiality of July, 1996 Report:
Electro-Coal Transfer Facility - Gannon Station

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2	1 - 6	G	(1), (3)
423-2	1 - 6	H	(2), (3)

Rationale for Confidentiality:

- (1) This information is the same as reported on the earlier Form 423-2 with the exception that this form pertains to Gannon Station as opposed to Big Bend Station. Disclosure of the effective purchase price "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat., for the same reasons as are set forth under the rationale for protecting Column G in Form 423-2 (Electro-Coal Transfer Facility - Big Bend Station).
- (2) The disclosure of this information "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat., for the same reasons asserted under (2) of the Rationale for Confidentiality for the Form 423-2 pertaining to Big Bend Station. Essentially, both Columns G & H both need confidential protection to prevent a competitor from "backing into" the segmented transportation charges.
- (3) Disclosure of the effective purchase price of Gatliff coal "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat.

**Justification for Confidentiality of July, 1996 Report:
Electro-Coal Transfer Facility - Gannon Station**

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(a)	1 - 6	H	(1)
423-2(a)	1 - 6	J	(2)
423-2(a)	1 - 6	L	(3)

Rationale for Confidentiality:

- (1) If the original invoice price is made public, one can subtract the original invoice price from the publicly disclosed delivered price at the Electro-Coal Transfer Facility and thereby determine the segmented river transportation cost. Disclosure of the river transportation cost "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Electro-Coal Transfer Facility - Big Bend Station).
- (2) This information, like that contained in Column H, would enable a competitor to "back into" the segmented transportation cost using the publicly disclosed delivered price at the Electro-Coal Transfer Facility. This would be done by subtracting the base price per ton from the delivered price at Electro-Coal, thereby revealing the river barge rate. Such disclosure "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Electro-Coal Transfer Facility - Big Bend Station).
- (3) This information, if publicly disclosed, would enable a competitor to back into the segmented waterborne transportation costs using the already publicly disclosed delivered price of coal at the Electro-Coal Transfer Facility. Such disclosure "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Electro-Coal Transfer Facility - Big Bend Station).

**Justification for Confidentiality of July, 1996 Report:
Electro-Coal Transfer Facility - Gannon Station**

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(b)	1 - 6	G	(1)
423-2(b)	1 - 6	I	(2)
423-2(b)	1 - 6	K	(3)
423-2(b)	1 - 6	L	(3)
423-2(b)	1 - 6	M	(3)
423-2(b)	1 - 6	N	(3)
423-2(b)	1 - 6	O	(3)
423-2(b)	1 - 6	P	(3)

Rationale for Confidentiality:

- (1) Disclosure of the effective purchase price in Column G "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Disclosure of the original invoice price per ton would enable a competitor to "back into" the segmented transportation cost using the publicly disclosed delivered price for coal at the Electro-Coal Transfer Facility. This would be done by subtracting the original invoice price per ton from the price per ton delivered at Electro-Coal, thereby revealing the river barge rate. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Electro-Coal Transfer Facility - Big Bend Station).
- (2) Disclosure of the rail rate per ton would adversely affect the ability of Tampa Electric and its affiliates to negotiate favorable rail rates with the various railroads serving areas in the vicinity of the river terminals used by Tampa Electric's affiliate, Gatliff Coal Company. This coal is shipped from different terminals which affords Gatliff some leverage in negotiating with the railroads. Disclosure of the rail rates paid would effectively eliminate this leverage and lead to higher rail rates. This would work to the ultimate detriment of Tampa Electric and its Customers. Accordingly, disclosure of this information "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat.

- (3) These columns contained information the disclosure of which "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Each of these columns provides specific information on segmented transportation costs which are the primary objects of this request. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality for Column G on 423-2 (Electro-Coal Transfer Facility - Big Bend Station).

**Justification for Confidentiality of July, 1996 Report:
Electro-Coal Transfer Facility - Polk Station (1)**

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2	1	G	(1)
423-2	1	H	(2)

Rationale for Confidentiality:

- (1) Disclosure of the effective purchase price "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. One can subtract the information in this column from the figure in Column I and obtain the segmented transportation cost including transloading and ocean barging.
- (2) The disclosure of this information "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Essentially, both Columns G & H both need confidential protection to prevent a competitor from determining the segmented transportation charges.

**Justification for Confidentiality of July, 1996 Report:
Electro-Coal Transfer Facility - Polk Station (1)**

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(a)	1	H	(1)
423-2(a)	1	J	(2)
423-2(a)	1	L	(3)

Rationale for Confidentiality:

- (1) If the original invoice price is made public, one can subtract the original invoice price from the publicly disclosed F.O.B. plant price at the Electro-Coal Transfer Facility and thereby determine the segmented terminalling and ocean barge transportation cost. Disclosure of the terminalling and ocean barge costs "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Big Bend Station).
- (2) This information, like that contained in Column H, would enable a competitor to "back into" the segmented transportation cost using the publicly disclosed F.O.B. plant price. This would be done by subtracting the base price per ton from the F.O.B. plant price at Big Bend Station, thereby revealing the terminalling and ocean barge rate. Such disclosure "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Big Bend Station).
- (3) This information, if publicly disclosed, would enable a competitor to back into the segmented terminalling and ocean barge transportation costs using the already publicly disclosed F.O.B. plant price at Big Bend Station. Such disclosure "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Big Bend Station).

Justification for Confidentiality of July, 1996 Report:
Electro-Coal Transfer Facility - Polk Station (1)

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(b)	1	G	(1)
423-2(b)	1	I	(2)
423-2(b)	1	K	(3)
423-2(b)	1	L	(3)
423-2(b)	1	M	(3)
423-2(b)	1	N	(3)
423-2(b)	1	O	(3)
423-2(b)	1	P	(3)

Rationale for Confidentiality:

- (1) Disclosure of the effective purchase price in Column G "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Disclosure of the effective purchase price per ton would enable a competitor to "back into" the segmented transportation cost using the publicly disclosed F.O.B. plant price for coal. This would be done by subtracting the effective purchase price per ton from the F.O.B. plant price per ton at Big Bend Station, thereby revealing the terminalling and ocean barge rate. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Big Bend Station).
- (2) Disclosure of the rail rate per ton would adversely affect the ability of Tampa Electric and its affiliates to negotiate favorable rail rates with the various railroads serving areas in the vicinity of Tampa Electric's coal suppliers. Disclosure of the rail rates paid would effectively eliminate any leverage and lead to higher rail rates. This would work to the ultimate detriment of Tampa Electric and its Customers. Accordingly, disclosure of this information "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat.
- (3) These columns contained information the disclosure of which "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Each of these columns provides specific information

on segmented transportation costs which are the primary objects of this request. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality for Column G on 423-2 (Bid Bend Station).

Justification for Confidentiality of July, 1996 Report:
Big Bend Station

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2	1	G	(1)
423-2	1	H	(2)

Rationale for Confidentiality:

- (1) Disclosure of the effective purchase price "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. One can subtract the information in this column from the figure in Column I and obtain the segmented transportation cost including transloading and ocean barging.
- (2) The disclosure of this information "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Essentially, both Columns G & H both need confidential protection to prevent a competitor from determining the segmented transportation charges.

**Justification for Confidentiality of July, 1996 Report:
Big Bend Station**

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(a)	1	H	(1)
423-2(a)	1	J	(2)
423-2(a)	1	L	(3)

Rationale for Confidentiality:

- (1) If the original invoice price is made public, one can subtract the original invoice price from the publicly disclosed F.O.B. plant price at the Electro-Coal Transfer Facility and thereby determine the segmented terminalling and ocean barge transportation cost. Disclosure of the terminalling and ocean barge costs "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Big Bend Station).
- (2) This information, like that contained in Column H, would enable a competitor to "back into" the segmented transportation cost using the publicly disclosed F.O.B. plant price. This would be done by subtracting the base price per ton from the F.O.B. plant price at Big Bend Station, thereby revealing the terminalling and ocean barge rate. Such disclosure "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Big Bend Station).
- (3) This information, if publicly disclosed, would enable a competitor to back into the segmented terminalling and ocean barge transportation costs using the already publicly disclosed F.O.B. plant price at Big Bend Station. Such disclosure "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Big Bend Station).

**Justification for Confidentiality of July, 1996 Report:
Big Bend Station**

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(b)	1	G	(1)
423-2(b)	1	I	(2)
423-2(b)	1	K	(3)
423-2(b)	1	L	(3)
423-2(b)	1	M	(3)
423-2(b)	1	N	(3)
423-2(b)	1	O	(3)
423-2(b)	1	P	(3)

Rationale for Confidentiality:

- (1) Disclosure of the effective purchase price in Column G "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Disclosure of the effective purchase price per ton would enable a competitor to "back into" the segmented transportation cost using the publicly disclosed F.O.B. plant price for coal. This would be done by subtracting the effective purchase price per ton from the F.O.B. plant price per ton at Big Bend Station, thereby revealing the terminalling and ocean barge rate. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Big Bend Station).
- (2) Disclosure of the rail rate per ton would adversely affect the ability of Tampa Electric and its affiliates to negotiate favorable rail rates with the various railroads serving areas in the vicinity of Tampa Electric's coal suppliers. Disclosure of the rail rates paid would effectively eliminate any leverage and lead to higher rail rates. This would work to the ultimate detriment of Tampa Electric and its Customers. Accordingly, disclosure of this information "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat.
- (3) These columns contained information the disclosure of which "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Each of these columns provides specific information

on segmented transportation costs which are the primary objects of this request. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality for Column G on 423-2 (Bid Bend Station).

Justification for Confidentiality of July, 1996 Report:
Gannon Station

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2	1 - 3	G	(1)
423-2	1 - 3	H	(2)

Rationale for Confidentiality:

- (1) This information is the same as reported on the earlier Form 423-2 with the exception that this form pertains to Gannon Station as opposed to Big Bend Station. Disclosure of the effective purchase price "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat., for the same reasons as are set forth under the rationale for protecting Column G in Form 423-2 (Big Bend Station).
- (2) The disclosure of this information "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat., for the same reasons asserted under (2) of the Rationale for Confidentiality for the Form 423-2 pertaining to Big Bend Station. Essentially, both Columns G & H both need confidential protection to prevent a competitor from determining the segmented transportation charges.

Justification for Confidentiality of July, 1996 Report:
Gannon Station

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(a)	1 - 3	H	(1)
423-2(a)	1 - 3	J	(2)
423-2(a)	1 - 3	L	(3)

Rationale for Confidentiality:

- (1) If the original invoice price is made public, one can subtract the original invoice price from the publicly disclosed F.O.D. price at Gannon Station and thereby determine the segmented terminalling and ocean barge transportation cost or rail rate. Disclosure of these transportation costs "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Big Bend Station).
- (2) This information, like that contained in Column H, would enable a competitor to "back into" the segmented transportation cost using the publicly disclosed delivered price at Gannon Station. This would be done by subtracting the base price per ton from the F.O.B. plant price at Gannon Station, thereby revealing the terminalling and ocean barge rate or rail rate. Such disclosure "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Big Bend Station).
- (3) This information, if publicly disclosed, would enable a competitor to back into the segmented terminalling or ocean barge transportation costs or rail rate using the already publicly disclosed F.O.B. plant price of coal at Gannon Station. Such disclosure "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Gannon Station).

**Justification for Confidentiality of July, 1996 Report:
Gannon Station**

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(b)	1 - 3	G	(1)
423-2(b)	1 - 3	I	(2)
423-2(b)	1 - 3	K	(3)
423-2(b)	1 - 3	L	(3)
423-2(b)	1 - 3	M	(3)
423-2(b)	1 - 3	N	(3)
423-2(b)	1 - 3	O	(3)
423-2(b)	1 - 3	P	(3)

Rationale for Confidentiality:

- (1) Disclosure of the effective purchase price in Column G "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Disclosure of the effective purchase price per ton would enable a competitor to "back into" the segmented transportation cost using the publicly disclosed F.O.B. plant price for coal at Gannon Station. This would be done by subtracting the effective purchase price per ton from the price per ton delivered at Gannon Station, thereby revealing the terminalling and ocean barge rate or rail rate. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Big Bend Station).
- (2) Disclosure of the rail rate per ton would adversely affect the ability of Tampa Electric affiliate, Gatliff Coal, to negotiate favorable rail rates. Disclosure of the rail rates paid would effectively eliminate any negotiating leverage and could lead to higher rail rates. This would work to the ultimate detriment of Tampa Electric and its Customers. Accordingly, disclosure of this information "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat.
- (3) These columns contained information the disclosure of which "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Each of these columns provides specific information

on segmented transportation costs which are the primary objects of this request. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality for Column G on 423-2 (Big Bend Station).

Justification for Confidentiality of July, 1996 Report:
Polk Station

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2	1	G	(1)
423-2	1	H	(2)

Rationale for Confidentiality:

- (1) This information is the same as reported on the earlier Form 423-2 with the exception that this form pertains to Polk Station as opposed to Big Bend Station. Disclosure of the effective purchase price "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat., for the same reasons as are set forth under the rationale for protecting Column G in Form 423-2 (Big Bend Station).
- (2) The disclosure of this information "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat., for the same reasons asserted under (2) of the Rationale for Confidentiality for the Form 423-2 pertaining to Big Bend Station. Essentially, both Columns G & H both need confidential protection to prevent a competitor from determining the segmented transportation charges.

**Justification for Confidentiality of July, 1996 Report:
Polk Station**

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(a)	1	H	(1)
423-2(a)	1	J	(2)
423-2(a)	1	L	(3)

Rationale for Confidentiality:

- (1) If the original invoice price is made public, one can subtract the original invoice price from the publicly disclosed F.O.B. price at Polk Station and thereby determine the segmented terminalling and ocean barge transportation cost or rail rate. Disclosure of these transportation costs "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Big Bend Station).
- (2) This information, like that contained in Column H, would enable a competitor to "back into" the segmented transportation cost using the publicly disclosed delivered price at Polk Station. This would be done by subtracting the base price per ton from the F.O.B. plant price at Polk Station, thereby revealing the terminalling and ocean barge rate or rail rate. Such disclosure "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Big Bend Station).
- (3) This information, if publicly disclosed, would enable a competitor to back into the segmented terminalling or ocean barge transportation costs or rail rate using the already publicly disclosed F.O.B. plant price of coal at Polk Station. Such disclosure "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Gannon Station).

**Justification for Confidentiality of July, 1996 Report:
Polk Station**

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(b)	1	G	(1)
423-2(b)	1	I	(2)
423-2(b)	1	K	(3)
423-2(b)	1	L	(3)
423-2(b)	1	M	(3)
423-2(b)	1	N	(3)
423-2(b)	1	O	(3)
423-2(b)	1	P	(3)

Rationale for Confidentiality:

- (1) Disclosure of the effective purchase price in Column G "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Disclosure of the effective purchase price per ton would enable a competitor to "back into" the segmented transportation cost using the publicly disclosed F.O.B. plant price for coal at Polk Station. This would be done by subtracting the effective purchase price per ton from the price per ton delivered at Polk Station, thereby revealing the terminalling and ocean barge rate or rail rate. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality of Column G of Form 423-2 (Big Bend Station).
- (2) Disclosure of the rail rate per ton would adversely affect the ability of Tampa Electric affiliate, Gatliff Coal, to negotiate favorable rail rates. Disclosure of the rail rates paid would effectively eliminate any negotiating leverage and could lead to higher rail rates. This would work to the ultimate detriment of Tampa Electric and its Customers. Accordingly, disclosure of this information "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat.
- (3) These columns contained information the disclosure of which "would impair the efforts of Tampa Electric to contract for goods or services on favorable terms." Section 366.093(3)(d), Fla. Stat. Each of these columns provides specific information

on segmented transportation costs which are the primary objects of this request. Additional justification appears in Exhibit "A" and in paragraph (1) of the rationale for confidentiality for Column G on 423-2 (Big Bend Station).

**Justification for Confidentiality of July, 1996 Report:
Tampa Electric Company**

<u>FORM</u>	<u>LINE(S)</u>	<u>COLUMN</u>	<u>RATIONALE</u>
423-2(c) (Page 2 of 2)	4	J,K	(1)
423-2(c) (Page 2 of 2)	6	J, K	(2)

Rationale for Confidentiality:

- (1) This information is contractual information which, if made public, "would impair the efforts of Tampa Electric to contract for goods and services on favorable terms." Section 366.093(3)(d), Fla. Stat. The information shows the actual rail rate paid by Tampa Electric. It is this segmented transportation cost data which is proprietary and confidential.
- (2) This information is contractual information which, if made public, "would impair the efforts of Tampa Electric to contract for goods and services on favorable terms." Section 366.093(3)(d), Fla. Stat. The information shows the actual rate paid by Tampa Electric for river barge transportation. It is this segmented transportation cost data which is proprietary and confidential.