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ORIGINAL

May 20, 1998

HAND DELIVERED

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

980643-EI

Re: (UNDOCKETED) Guidelines for Developing Cost Allocations
for Manual for Transactions Between Regulated Operations,
Nonregulated Operations and Affiliates

Dear Ms. Bayo:

Tampa Electric has submitted under separate cover letter highlighted pages from its answers to Revised Data Request No. 4 (pages 1 of 3, 2 of 3 and pages 3 of 3) in the above matter, along with a request that the highlighted information be protected from public disclosure pursuant to Section 366.093, Fla. Stat. Attached hereto as Exhibit "A" are two copies of a public version of the subject documents. The pages in Exhibit "A" have the sensitive information blacked out rather than highlighted.

Enclosed as Exhibit "B" is a narrative detailing the nature of the sensitivity of each of these documents with an explanation of how Tampa Electric can be harmed in the event the highlighted confidential version of the pages in question are publicly disclosed.

As is indicated in the confidential version of this filing, the information which is the subject of the request for confidential classification is intended to be and is treated by Tampa Electric as private and has not been disclosed publicly.

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

DOCUMENT NUMBER-DATE

05582 MAY 20 88

FPSC-RECORDS/REPORTING

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Thank you for your assistance in connection with this matter.

Sincerely,


James D. Beasley

JDB/pp
Enclosures


cc: Tim Devlin (w/enc.)

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4. Please provide a detailed breakdown of Account 451, Miscellaneous Service Revenues, and Account 456, Other Electric Revenues, for 1997, indicating if any revenues are received from non-regulated operations.
- A. Listed below are items which are above the line for regulatory purposes except for job orders recorded in Account 456. Those that are tariffed are indicated with an asterisk. We have included Rental Revenues (Account 454) and Residual Revenues (credits to Account 501/547 - Nonrecoverable Fuel), even though these items were not requested.



<u>Account 451 - Description</u>	<u>Amount</u>
* Turn-on (existing home)	\$2,446,736
* Turn-on (new home)	508,782
* Turn-on (construction pole)	400,030
* Late Payment Fee	2,419,555
* Reconnect Charge	891,835
* Tampering Charge	40,708
* Return Check Charge	429,738
* Field Credit Charge	<u>109,552</u>
Total Misc. Service Revenues	<u>\$7,246,936</u>

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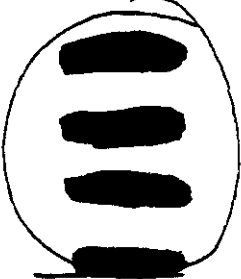



<u>Account 454 - Description</u>	<u>Amount</u>	<u>Line</u>
Commercial Property Rental: Rental from activities other than Agricultural such as parking, right of ways, residential rental units, slip docks, etc.	\$446,175	1
Electrical Equipment Rental: Lease of non-standard electrical distribution equipment.	166,463	2
Agricultural Property Rental: Rental from leasing property, right of ways for Agricultural use.	62,938	3
* Pole Attachments Rental: Rental fee charged to Cable TV & Phone Companies for attachments to TEC's utility poles. (Regulated by the FCC)	4,151,228	4
Plaza Meeting Rooms Rental: Rental of corporate office building meeting rooms to outside groups.	7,550	5
Telecommunications Rental: Rental from leasing dark fiber, capacity, tower space, and conduit space with TEC facilities to certified telecommunication providers.		6
Telecommunication Pole Attachments Rental: Rental from Telecommunications Pole attachments.	<u>21,152</u>	
Total Rental Revenue	<u>\$6,681,786</u>	

<u>Account 456 - Description</u>	<u>Amount</u>
Steam Sales: Steam from TEC's generating unit.	\$ 320,374
Job Orders: Job Orders are utilized to track costs that are associated with a particular activity for which a customer will be billed the cost plus a margin.	559,171
Training Modules: Power Pros is a complete line operations training package that includes five comprehensive skills training programs. It is sold to other utilities.	235,062
* Wheeling: Revenues received based on FERC approved Transmission Service rates for Transmission Services for Transmission Services provided for delivering (wheeling) of electrical capacity and energy from Customer's Cogeneration sites, within TEC service area, to other electric utilities outside TEC service area.	3,603,108

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		<u>Line</u>
Cogeneration Maintenance: Revenues received for transmission and substation operation and maintenance service provided by TEC on cogeneration customers' electrical equipment.	619,105	
Gypsum: A by-product which results from the scrubbing of the flue gasses at TEC's Big Bend generating facility.		1
Sulfuric Acid: A by-product which results from the purification of gassified coal at TEC's Polk generating facility.		2
Unbilled Revenues	(257,172)	3
Deferred Conservation	(957,791)	4
Deferred Revenue	30,450,000	5
Miscellaneous	<u>412,710</u>	6
Total Other Electric Revenues	<u>\$36,669,980</u>	7

Account 501/547 (Nonrecoverable Fuel Expense) - Description

	<u>Amount</u>	
Residual Revenue- Flyash Sales: A residual which results from the combustion of coal in TEC's generating units.		8
Residual Revenue-Bottom Ash Sales: A residual which results from the combustion of coal in TEC's generating units.		9
Residual Revenue-Slag Sales: A residual which results from the combustion of coal in TEC's generating units.		10
Residual Revenue-Brine Sales: A residual which results from the purification of gassified coal at TEC's Polk generating facility.		11
Total Residual Revenues	<u>\$1,132,809</u>	

* Revenues from regulated operations.

TAMPA ELECTRIC COMPANY

(UNDOCKETED)

**Justification for Confidentiality of
Portions of Tampa Electric's Response to
Revised Data Request No. 4 Filed May 20, 1998**

<u>Response Page No.</u>	<u>Line</u>	<u>Rationale</u>
Page 2 of 3	6	(1)
Page 3 of 3	1,2,8,9,10	(2)

Rationale for Confidentiality

- (1) The total amount of telecommunications rental revenues shown can be used with other information previously filed with the Commission or otherwise publicly disclosed to determine, or "back into", the unit rental price for the facilities being rented. Tampa Electric is actively negotiating similar rental arrangements with two other entities who could make good use of the information in question to the detriment of Tampa Electric and its customers. Publicly disclosing this information could reduce the rental revenues Tampa Electric is able to receive from these potential additional renters. As such, the information is proprietary, confidential business information which is entitled to protection from public disclosure under Section 366.093, Florida Statutes.
- (2) The dollar amount shown is by-product revenues Tampa Electric receives from various third parties. By-product revenues reduce Tampa Electric's cost of doing business and, thus, benefit Tampa Electric's customers. Tampa Electric negotiates with other third parties for by-product sales. Disclosure of the information in question could be used by those third parties, in conjunction with other information previously filed with the Commission on a nonconfidential basis or otherwise publicly disclosed, to develop, or "back into", the by-product unit price Tampa Electric has negotiated with existing by-product purchasers. This could lead to lower by-product prices than Tampa Electric could negotiate if this information were not made public. As such, the information in question is proprietary confidential business information which is entitled to protection from public disclosure under Section 366.093, Florida Statutes.

Exhibit "B"