

RUTLEDGE, ECENIA, PURNELL & HOFFMAN

ORIGINAL

PROFESSIONAL ASSOCIATION
ATTORNEYS AND COUNSELORS AT LAW

STEPHEN A. ECENIA
JOHN R. ELLIS
KENNETH A. HOFFMAN
THOMAS W. KONRAD
MICHAEL G. MAIDA

POST OFFICE BOX 551, 32302-0551
215 SOUTH MONROE STREET, SUITE 420
TALLAHASSEE, FLORIDA 32301-1841

J. STEPHEN MENTON
R. DAVID PRESCOTT
HAROLD F. X. PURNELL
GARY R. RUTLEDGE

TELEPHONE (850) 681-6788
TELECOPIER (850) 681-6515

October 26, 2000

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Betty Easley Conference Center, Room 110
Tallahassee, Florida 32399-0850

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Re: Docket No. 000061-EI

Dear Ms. Bayo:

Enclosed for filing on behalf of Allied/CFI are the original and fifteen copies of Allied/CFI's Motion for Reconsideration.

Please acknowledge this filing by date-stamping and returning the enclosed copy of this letter.

Thank you for your assistance with this filing.

Sincerely,

John R. Ellis

JRE/rl
Enclosures
cc: All Counsel
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Done 10/31/00

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

ORIGINAL

In re: Complaint of Allied Universal Corporation and Chemical Formulators, Inc. against Tampa Electric Company for violation of Sections 366.03, 366.06(2) and 366.07, Florida Statutes, with respect to rates offered under Commercial/Industrial Service Rider tariff; petition to examine and inspect confidential information; and request for expedited relief.

Docket No. 000061-EI

Filed: October 26, 2000

ALLIED/CFI'S MOTION FOR RECONSIDERATION

Allied Universal Corporation ("Allied") and its affiliate, Chemical Formulators, Inc. ("CFI"), hereinafter referred to collectively as "Allied/CFI," by and through their undersigned counsel, and pursuant to Rule 25-22.376, Florida Administrative Code, move for reconsideration as to Order No. PSC-00-1886-CFO-EI, issued on October 16, 2000 ("Order re: Confidential Treatment"), and state:

1. On March 10, 2000, Tampa Electric Company ("TECO") filed a set of documents (Document Nos. 03140-00, 03141-00, 03142-00, 03143-00, consisting of over 1,800 pages) related to its 1998 dealings with Sentry Industries, Inc. ("Sentry") and Odyssey Manufacturing Company ("Odyssey"), and its 1999 dealings with Allied/CFI. TECO requested confidential classification of all of the pages of the documents under the confidentiality term of its Commercial/Industrial Service Rider ("CISR") tariff. The documents included copies of tariff sheets and newspaper articles, among other public records.

2. Order No. PSC-00-1530-PCO-EI, issued April 23, 2000, found that the confidentiality term of the CISR tariff did not obviate the need for a finding that information contained in the documents meets the definition of proprietary business information stated in Section

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366.093, Florida Statutes, as a prerequisite of confidential classification. Order No. PSC-00-1171-CFO-EI, issued June 27, 2000 ("Discovery Order"), denied TECO's blanket request for confidential classification and directed TECO to submit a revised request for confidential classification with justifications as required by Section 366.093, Florida Statutes.

3. On July 7, 2000, TECO filed a Supplemental Request for Confidential Classification of Documents with respect to documents in question. On August 10, 2000, TECO filed a revised Request for Confidential Classification as to the documents. TECO also moved for reconsideration of the Discovery Order. TECO's motion for reconsideration was denied by Order No. PSC-00-1530-PCO-EI, issued August 23, 2000.

4. Allied/CFI first received copies of any of the pages filed as Document No. 03140-00 apparently (consisting of approximately 1,000 pages) on August 14, 2000. Among the pages received at that time were copies of correspondence between TECO and Sentry dated between March 14, 1998 and June 11, 1998. This correspondence reflects that Sentry's initial application to TECO was for service under TECO's IS-3 and IST-3 rate schedules, at a time when TECO's CISR tariff was not in existence. TECO's petition for approval of its CISR tariff was not filed until June 2, 1998, and the CISR tariff was approved by Order No. PSC-98-1081-FOF-EI, issued August 10, 1998.

5. The Order re: Confidential Treatment grants in part and denies in part TECO's request for confidential classification as to specific pages and lines of Document No. 03140-00. Allied/CFI contends that the following pages of Document No. 03140-00, consisting of correspondence between TECO and Sentry, should not be classified as proprietary business information pursuant to Section 366.093, Florida Statutes, except as to limited information which may be redacted from the correspondence:

<u>Bates Stamp Nos.</u>	<u>Description</u>
836-0 to 839-0	Letter from Allman/TECO to Sidelko/Sentry, dated March 14, 1998 (with enclosures 3, 4 and 5)
26-0 to 27-0	Letter from Allman/TECO to Sidelko/Sentry, dated March 24, 1998 (with enclosures)
350-0 to 356-0	Letter from Allman/TECO to Sidelko/Sentry, dated April 3, 1998 (with enclosure)
829-0 to 833-0	Letter from Allman/TECO to Sidelko/Sentry, dated April 17, 1998
350-0 to 356-0	Fax cover sheet from Sidelko/Sentry to Allman/TECO, dated April 24, 1998 (with enclosures)
799-0 to 800-0	Letter from Allman/TECO to Sidelko/Sentry, dated April 28, 2000
813-0	Letter from Allman/TECO to Sidelko/Sentry, dated May 11, 1998
798-0	Letter from Allman/TECO to Sidelko/Sentry, dated May 11, 1998
39-0 to 41-0	Letter from Allman/TECO to Sidelko/Sentry, dated May 14, 1998
789-0 to 790-0	Letter from Allman/TECO to Sidelko/Sentry, dated June 4, 1998
787-0 to 788-0	Letter from Allman/TECO to Sidelko/Sentry, dated June 9, 1998
782-0 to 784-0	Letter from Allman/TECO to Sidelko/Sentry, dated June 11, 1998

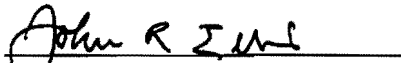
6. As stated in the Order re: Confidential Treatment, Florida law presumes that documents submitted to governmental agencies shall be public records. Here, the correspondence

listed above primarily concerns an application to a public utility by a prospective industrial customer for electric service pursuant to rate schedules which the Commission maintains as public records. Allied/CFI believes that the above-listed correspondence should be treated as public records, except as to limited information subject to redaction.

7. To the extent that the facts concerning the effective date of TECO's CISR tariff and the subjects of the above-listed correspondence may have been overlooked or not considered in the Order re: Confidential Treatment, Allied/CFI respectfully requests reconsideration of the decision to grant confidential classification accordingly.

WHEREFORE, Allied/CFI requests an order finding that the pages of Document No. 003140-00 listed above are public records which are not entitled to confidential classification, except as to limited information to be redacted from those pages.

Respectfully submitted,



Kenneth A. Hoffman, Esq.

John R. Ellis, Esq.

Rutledge, Ecenia, Purnell & Hoffman, P.A.

P. O. Box 551

Tallahassee, FL 32302

(850) 681-6788

Attorneys for Allied Universal Corporation and
Chemical Formulators, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing Allied/CFI's Motion for Reconsideration was furnished by U. S. Mail or hand delivery(*) to the following this 26th day of October, 2000:

Robert V. Elias, Esq.(*)
Marlene Stern, Esq.
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 370
Tallahassee, Florida 32399-0850

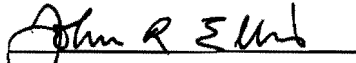
Lee L. Willis, Esq.
James D. Beasley, Esq.
Ausley & McMullen
227 South Calhoun Street
Tallahassee, Florida 32301

Harry W. Long, Jr., Esq.
TECO Energy, Inc.
Legal Department
P. O. Box 111
Tampa, FL 33601

Patrick K. Wiggins, Esq.
Wiggins & Villacorta
P. O. Box 1657
Tallahassee, FL 32302

Wayne L. Schiefelbein, Esq.
P. O. Box 15856
Tallahassee, FL 32317-5856

Scott J. Fuerst, Esq.
Ruden, McClosky, et al.
200 East Broward Blvd.
Ft. Lauderdale, FL 33301


John R. Ellis