

AUSLEY & McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

123 SOUTH CALHOUN STREET
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TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

RECEIVED-FPSC
10 SEP 30 PM 12:10
COMMISSION
CLERK

September 30, 2010

HAND DELIVERED

Ms. Ann Cole, Director
Division of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Fuel and Purchased Power Cost Recovery Clause with Generating
Performance Incentive Factor; FPSC Docket No. 100001-EI

Dear Ms. Cole:

Enclosed for filing in the above docket are the original and seven (7) copies of Tampa Electric Company's Request for Confidential Classification and Motion for Temporary Protective Order regarding portions of its answers to the Florida Public Service Commission Staff's Fourth Set of Interrogatories Nos. 36-45.

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/jh
Enclosure

cc: All parties of record (w/enc.)

- COM _____
- APA _____
- ECR 3
- GCL _____
- RAD _____
- SSC _____
- ADM _____
- OPC _____
- CLK Pena

CLAIM OF CONFIDENTIALITY
 NOTICE OF INTENT
 REQUEST FOR CONFIDENTIALITY
 FILED BY OPC

FOR DN 08175-10, WHICH IS IN LOCKED STORAGE. YOU MUST BE AUTHORIZED TO VIEW THIS DN. - CLK

DOCUMENT NUMBER-DATE

08176 SEP 30 09

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased)
Power Cost Recovery Clause)
and Generating Performance)
Incentive Factor.)
_____)

DOCKET NO. 100001-EI

FILED: September 30, 2010

**TAMPA ELECTRIC COMPANY'S
REQUEST FOR CONFIDENTIAL CLASSIFICATION
AND MOTION FOR TEMPORARY PROTECTIVE ORDER**

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby request confidential classification of the yellow highlighted information contained in the following described document(s) ("the Document(s)") stamped "CONFIDENTIAL" and all information that is or may be printed on yellow paper stock stamped "CONFIDENTIAL" within the Document(s), all of said confidential information being hereinafter referred to as "Confidential Information."

Description of the Document(s)

Tampa Electric's answers to the Florida Public Service Commission Staff's Fourth Set of Interrogatories (Nos. 36 and 37), a single copy of which is being simultaneously filed with the Commission on a confidential basis under a separate transmittal letter. Bates Stamp pages 2 through 9 contain certain information ("Confidential Information") highlighted in yellow. In support of this request, the company states:

1. Subsection 366.093(1), Florida Statutes, provides that any records "found by the Commission to be propriety confidential business information shall be kept confidential and shall be exempt from s. 119.07(1), Florida Statutes [requiring disclosure under the Public Records

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Act].” Proprietary confidential business information includes, but is not limited to “[i]nformation concerning . . . contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms.” Subsection 366.093(3)(d), Florida Statutes. Proprietary confidential business information also includes “[i]nformation relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information.” Section 366.093(3)(e), Florida Statutes. The Confidential Information that is the subject of this request and motion falls within the statutory categories and, thus, constitutes propriety confidential business information entitled to protection under Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code.

2. Attached hereto as Exhibit "A" is a justification for confidential treatment of the Confidential Information contained in the Document(s).

3. Attached hereto as Exhibit "B" are two public versions of the Document(s) with the Confidential Information redacted, unless previously filed as indicated.

4. The Confidential Information contained in the Document(s) is intended to be and is treated by Tampa Electric as private and has not been publicly disclosed.

5. For the same reasons set forth herein in support of its request for confidential classification, Tampa Electric also moves the Commission for entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

Requested Duration of Confidential Classification

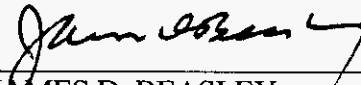
6. Tampa Electric requests that the Confidential Information be treated by the Commission as confidential proprietary business information for at least the 18 month period

prescribed in Rule 25-22.006(9)(a), Florida Administrative Code. If, and to the extent that the company is in need of confidential classification of the Confidential Information beyond the 18 month period set forth in the Commission rule, the justification and grounds for such extended confidential treatment are set forth in Exhibit "C" to this request and motion.

WHEREFORE, Tampa Electric Company respectfully requests that the Confidential Information that is the subject of this request and motion be accorded confidential classification for the reasons set forth herein and for a minimum period of 18 months, subject to any request for a longer period of confidential classification as may be set forth in Exhibit "C" to this request and motion. The company further moves for the entry of a temporary protective order pursuant to Rule 25-22.006(6)(c), Florida Administrative Code, protecting the Confidential Information from public disclosure.

DATED this 30th day of September, 2010.

Respectfully submitted,



JAMES D. BEASLEY
J. JEFFRY WAHLEN
Ausley & McMullen
Post Office Box 391
Tallahassee, Florida 32302
(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification and Motion for Temporary Protective Order, filed on behalf of Tampa Electric Company, has been served by hand delivery (*) or U. S. Mail on this 30th day of September, 2010 to the following:

Ms. Lisa C. Bennett*
Staff Attorney
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Mr. John T. Burnett
Associate General Counsel
Progress Energy Service Co., LLC
Post Office Box 14042
St. Petersburg, FL 33733-4042

Mr. Paul Lewis, Jr.
Progress Energy Service Co., LLC
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Tallahassee, FL 32301-7740

Ms. Vicki Kaufman
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Keefe Anchors Gordon & Moyle, PA
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Tallahassee, FL 32301

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Tampa, FL 33601-3350

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Associate Public Counsel
Office of Public Counsel
111 West Madison Street – Room 812
Tallahassee, FL 32399-1400

Ms. Beth Keating
Akerman Senterfitt
106 East College Avenue, Suite 1200
Tallahassee, FL 32302-1877

Mr. George Bachman
Ms. Cheryl Martin
Florida Public Utilities Company
P. O. Box 3395
West Palm Beach, FL 33402-3395

Mr. John T. Butler
Managing Attorney - Regulatory
Florida Power & Light Company
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Mr. R. Wade Litchfield
Florida Power & Light Company
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Tallahassee, FL 32301-1859

Ms. Susan Ritenour
Secretary and Treasurer
Gulf Power Company
One Energy Place
Pensacola, FL 32520-0780

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Mr. Russell A. Badders
Mr. Steven R. Griffin
Beggs & Lane
Post Office Box 12950
Pensacola, FL 32591-2950

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Shayla L. McNeill, Capt, USAF
Air Force Legal Operations Agency
Utility Litigation Field Support Center
139 Barnes Drive, Suite 1
Tyndall Air Force Base, FL 32403-5319

Ms. Cecilia Bradley
Senior Assistant Attorney General
Office of the Attorney General
The Capitol – PL01
Tallahassee, FL 32399-1050

Mr. James W. Brew
Mr. F. Alvin Taylor
Brickfield, Burchette, Ritts & Stone, P.C.
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, D.C. 20007-5201

Mr. Randy B. Miller
White Springs Agricultural Chemicals, Inc.
Post Office Box 300
White Springs, FL 32096



ATTORNEY

**JUSTIFICATION FOR CONFIDENTIAL TREATMENT OF
HIGHLIGHTED PORTIONS OF TAMPA ELECTRIC'S RESPONSES TO
STAFF'S FOURTH SET OF INTERROGATORIES (FILED SEPTEMBER 30, 2010)**

<u>Interrogatory No.</u>	<u>Bates Page Nos.</u>	<u>Detailed Description</u>	<u>Rationale</u>
36	2 through 8	The Highlighted Information	(1)
37	9	The Highlighted Information	(1)

- (1) The information contained on the listed pages contains specific fuel hedging pricing. This type of information on a commodity has been recognized by the Commission on numerous occasions to constitute proprietary confidential business information. Knowledge of this information would allow the opportunity for market manipulation through transactions made in anticipation of the company's entry into the market. Market manipulations based on knowledge of the highlighted information would increase the price of fuel paid by Tampa Electric's customers as well as the price paid by the company to hedge the customers' price of fuel. This is the specific type of information described in Section 366.093(3)(d) and (e) as being entitled to confidential protection and exemption from the Public Records Law.

PUBLIC VERSION(S) OF THE DOCUMENT(S)

Attached hereto (unless previously filed as may be noted below) are two public versions of the Document(s) with the Confidential Information redacted.

Public Version(s) of the Document(s) attached x

Public Version(s) of the Document(s) previously filed on _____

REDACTED

BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

**In re: Fuel and Purchased Power)
Cost Recovery Clause with)
Generating Performance Incentive)
Factor)**

**DOCKET NO. 100001-EI
SERVED: September 30, 2010**

REDACTED

TAMPA ELECTRIC COMPANY'S

ANSWERS TO FOURTH SET OF INTERROGATORIES (NOS. 36 - 45)

OF

FLORIDA PUBLIC SERVICE COMMISSION STAFF

DOCUMENT NUMBER / DATE

08176 SEP 30 2010

FPSC-COMMISSION CLERK

**TAMPA ELECTRIC COMPANY
DOCKET NO. 100001-EI
INDEX TO STAFF'S FOURTH SET OF INTERROGATORIES (NOS. 36-45)**

<u>Number</u>	<u>Witness</u>	<u>Subject</u>	<u>Bates Stamped Page</u>
36	Wehle	<p>Staff is asking for the following information to determine if Tampa Electric Company's (TECO) hedging activities were prudent. Specifically, staff needs to understand and be satisfied that TECO essentially paid market prices for swaps, options, and any other hedging instruments for each fuel type.</p> <p>a. For realized (actual) hedging gains and losses for the twelve months beginning August 1, 2009, and ending July 31, 2010, associated with swap contracts for natural gas, please supply the following information: (1) the transaction date (the date the swap was entered into) for the swap; (2) the fixed price for the swap; (3) the month or period in the future the swap is covering; and (4) the corresponding NYMEX futures price for the future month or period for natural gas on the transaction date of the swap. Please supply responses in a schedule format.</p> <p>b. For realized (actual) hedging gains and losses for the twelve months beginning August 1, 2009, and ending July 31, 2010, associated with swap contracts for <u>fuel oil</u>, please supply the following information: (1) the transaction date (the date the swap was entered into) for the swap; (2) the fixed price for the swap; (3) the month or period in the future the swap is covering; and (4) the corresponding NYMEX futures price for the future month or period for natural gas on the transaction date of the swap. Please supply responses in a schedule format.</p> <p>c. For interrogatories 36a. and 36b. above, please explain any difference between the swap fixed price and the corresponding futures or forward price for the future period (the period being hedged) that is greater than 5 percent of the swap fixed price.</p> <p>d. For realized (actual) hedging gains and losses for the twelve months beginning August 1,</p>	1

		<p>2009, and ending July 31, 2010, associated with <u>options for natural gas prices</u>, please supply the following information: (1) the transaction date for the option; (2) the option price or premium; (3) the type of option; (4) the time to expiration; and (5) the corresponding futures price, forward price, or comparable market price for the period on the transaction date of the option. Please supply responses in a schedule format.</p> <p>e. For realized (actual) hedging gains and losses for the twelve months beginning August 1, 2009, and ending July 31, 2010, associated with <u>options for fuel oil prices</u>, please supply the following information: (1) the transaction date for the option; (2) the option price or premium; (3) the type of option; (4) the time to expiration; and (5) the corresponding futures price, forward price, or comparable market price for the period on the transaction date of the option. Please supply responses in a schedule format.</p> <p>f. For interrogatories 36d. through 36e. above, please explain any difference between the option price and the corresponding futures price, forward price, or comparable market price for the future period (the period being hedged) that is greater than 5 percent of the option price.</p>	
37	Wehle	Please state the realized hedging gains and losses by fuel type and by type of hedging instrument for the twelve months beginning August 1, 2009, and ending July 31, 2010.	9
38	Wehle	For the twelve months beginning August 1, 2009, and ending July 31, 2010, for each month that hedged volumes of fuel oil or natural gas were outside the percentage range for volumes to be hedged stated in TECO's risk management plan or otherwise stated in internal procedures governing TECO's hedging activities, please state the month, the extent to which the volume hedged was outside of the range, and an explanation of the cause.	10
39	Wehle	Please supply a comparison of TECO's Risk Management Plans for 2010 and 2011. Please explain or describe any changes between 2010 and 2011.	11
40	Wehle	Regarding hedging activities, please explain or describe how TECO assesses and evaluates counter-party credit risk?	12

41	Wehle	For open hedging transactions since August 1, 2009, has TECO experienced any defaults by a counter-party? If so, please identify the counter-party and explain the reason for the default(s).	13
42	Wehle	For realized hedging transactions since August 1, 2009, did TECO experience any defaults by a counter-party? If so, please identify the counter-party and explain the reason for the default(s).	14
43	Wehle	For all currently open hedging transactions, does TECO have any concern regarding default by a counter-party for any specific transaction? If so, please identify the counter-party and explain.	15
44	Wehle	Since January 1, 2009, has TECO stopped engaging in hedging transactions with a particular counter-party due to credit risk concerns? If so, please identify the counter-party and explain.	16
45	Wehle	Based on TECO's current understanding, please explain or describe how the Dodd-Frank Wall Street Reform and Consumer Protection Act affects TECO's hedging activities?	17

Joann T. Wehle
Director, Wholesale Marketing and Fuels

Tampa Electric Company
702 N. Franklin Street
Tampa, Florida 33602

**TAMPA ELECTRIC COMPANY
DOCKET NO. 100001-EI
STAFF'S FOURTH SET OF
INTERROGATORIES
INTERROGATORY NO. 36
PAGE 1 OF 8
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36. Staff is asking for the following information to determine if Tampa Electric Company's (TECO) hedging activities were prudent. Specifically, staff needs to understand and be satisfied that TECO essentially paid market prices for swaps, options, and any other hedging instruments for each fuel type.
- a. For realized (actual) hedging gains and losses for the twelve months beginning August 1, 2009, and ending July 31, 2010, associated with swap contracts for natural gas, please supply the following information: (1) the transaction date (the date the swap was entered into) for the swap; (2) the fixed price for the swap; (3) the month or period in the future the swap is covering; and (4) the corresponding NYMEX futures price for the future month or period for natural gas on the transaction date of the swap. Please supply responses in a schedule format.
 - b. For realized (actual) hedging gains and losses for the twelve months beginning August 1, 2009, and ending July 31, 2010, associated with swap contracts for fuel oil, please supply the following information: (1) the transaction date (the date the swap was entered into) for the swap; (2) the fixed price for the swap; (3) the month or period in the future the swap is covering; and (4) the corresponding NYMEX futures price for the future month or period for natural gas on the transaction date of the swap. Please supply responses in a schedule format.
 - c. For interrogatories 36a. and 36b. above, please explain any difference between the swap fixed price and the corresponding futures or forward price for the future period (the period being hedged) that is greater than 5 percent of the swap fixed price.
 - d. For realized (actual) hedging gains and losses for the twelve months beginning August 1, 2009, and ending July 31, 2010, associated with options for natural gas prices, please supply the following information: (1) the transaction date for the option; (2) the option price or premium; (3) the type of option; (4) the time to expiration; and (5) the corresponding futures price, forward price, or comparable market price for the period on the transaction date of the option. Please supply responses in a schedule format.
 - e. For realized (actual) hedging gains and losses for the twelve months beginning August 1, 2009, and ending July 31, 2010, associated with options for fuel oil prices, please supply the following information: (1) the

TAMPA ELECTRIC COMPANY
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 INTERROGATORIES
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 PAGE 2 OF 8
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transaction date for the option; (2) the option price or premium; (3) the type of option; (4) the time to expiration; and (5) the corresponding futures price, forward price, or comparable market price for the period on the transaction date of the option. Please supply responses in a schedule format.

- f. For interrogatories 36d. through 36e. above, please explain any difference between the option price and the corresponding futures price, forward price, or comparable market price for the future period (the period being hedged) that is greater than 5 percent of the option price.

A. a.

Transaction Date	Period Covered	Fixed Price	NYMEX Price
27-Aug-07	Aug-09		7.71
4-Sep-07	Sep-09		7.95
6-Sep-07	Aug-09		7.94
6-Sep-07	Aug-09		7.94
6-Sep-07	Sep-09		7.98
11-Oct-07	Oct-09		7.99
11-Oct-07	Oct-09		7.99
7-Nov-07	Nov-09		8.44
12-Nov-07	Nov-09		8.63
12-Dec-07	Dec-09		8.87
14-Dec-07	Dec-09		8.67
4-Jan-08	Jan-10		9.06
11-Feb-08	Feb-10		9.32
11-Feb-08	Feb-10		9.32
27-Feb-08	Mar-10		9.46
18-Mar-08	Sep-09		8.84
19-Mar-08	Apr-09		8.54
19-Mar-08	Apr-09		8.56
19-Mar-08	Apr-09		8.63
20-Mar-08	Apr-09		8.45
20-Mar-08	Apr-09		8.47
20-Mar-08	Apr-09		8.54
26-Mar-08	Dec-09		9.76
1-Apr-08	Oct-09		9.03
1-Apr-08	Apr-10		8.34
6-May-08	Mar-10		10.68
6-May-08	May-10		9.22
6-May-08	May-10		9.22

REDACTED

TAMPA ELECTRIC COMPANY
DOCKET NO. 100001-EI
STAFF'S FOURTH SET OF
INTERROGATORIES
INTERROGATORY NO. 36
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22-May-08	Apr-09		10.82
22-May-08	Sep-09		10.80
22-May-08	Sep-09		10.90
22-May-08	Nov-09		11.18
22-May-08	Nov-09		11.18
29-May-08	Nov-09		10.81
29-May-08	May-10		9.54
4-Jun-08	Apr-09		10.80
4-Jun-08	Apr-09		10.81
4-Jun-08	Apr-09		10.87
4-Jun-08	Nov-09		11.11
4-Jun-08	Nov-09		11.47
4-Jun-08	Nov-09		11.69
4-Jun-08	Nov-09		11.64
4-Jun-08	Nov-09		11.39
9-Jun-08	Jun-10		9.85
26-Jun-08	Dec-09		12.43
7-Jul-08	Jul-10		10.69
8-Jul-08	Apr-09		11.69
8-Jul-08	Apr-09		11.71
8-Jul-08	Apr-09		11.79
24-Jul-08	Nov-09		10.02
24-Jul-08	Nov-09		10.37
24-Jul-08	Nov-09		10.59
24-Jul-08	Nov-09		10.54
24-Jul-08	Nov-09		10.29
24-Jul-08	Jul-10		8.96
22-Aug-08	Jan-09		8.85
22-Aug-08	Jan-09		8.85
22-Aug-08	Jan-09		8.85
22-Aug-08	Jan-09		8.85
22-Aug-08	Jan-09		8.88
22-Aug-08	Jan-09		8.88
22-Aug-08	Jan-09		8.88
22-Aug-08	Jan-09		8.88
22-Aug-08	Jan-09		8.88
22-Aug-08	Jan-09		8.96
22-Aug-08	Jan-09		8.96
22-Aug-08	Jan-09		8.96
22-Aug-08	Jan-09		8.96
22-Aug-08	Jan-09		8.96
22-Aug-08	Jan-09		8.96
22-Aug-08	Jan-09		9.25
22-Aug-08	Jan-09		9.25
22-Aug-08	Jan-09		9.25
22-Aug-08	Jan-09		9.25

REDACTED

TAMPA ELECTRIC COMPANY
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STAFF'S FOURTH SET OF
INTERROGATORIES
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22-Aug-08	Jan-09	9.60
22-Aug-08	Jan-09	9.60
22-Aug-08	Jan-09	9.60
22-Aug-08	Jan-09	9.60
25-Aug-08	Jan-09	8.87
25-Aug-08	Jan-09	8.90
25-Aug-08	Jan-09	8.98
25-Aug-08	Jan-09	9.28
25-Aug-08	Jan-09	9.63
26-Aug-08	Apr-09	9.09
26-Aug-08	Apr-09	9.12
26-Aug-08	Apr-09	9.20
4-Sep-08	Jan-09	8.48
4-Sep-08	Apr-09	8.48
4-Sep-08	Jan-09	8.45
4-Sep-08	Sep-09	8.45
4-Sep-08	Apr-09	8.45
4-Sep-08	Sep-09	8.45
4-Sep-08	Apr-09	8.60
4-Sep-08	Oct-09	8.60
4-Sep-08	Jan-09	8.60
4-Sep-08	Jan-09	8.88
4-Sep-08	Dec-09	9.30
4-Sep-08	Dec-09	9.30
4-Sep-08	Jan-09	9.30
30-Sep-08	Aug-09	8.16
30-Sep-08	Dec-09	8.94
30-Sep-08	Apr-10	8.17
8-Oct-08	Aug-09	7.66
8-Oct-08	Sep-09	7.69
28-Oct-08	Aug-09	7.05
28-Oct-08	Sep-09	7.08
12-Nov-08	Aug-09	6.95
12-Nov-08	Aug-09	6.95
12-Nov-08	Oct-09	7.07
13-Nov-08	Aug-09	6.94
13-Nov-08	Oct-09	7.06
14-Nov-08	May-10	7.32
14-Nov-08	Jun-10	7.42
4-Dec-08	Jan-10	7.78
4-Dec-08	Feb-10	7.79
4-Dec-08	Feb-10	7.79
4-Dec-08	Mar-10	7.62

REDACTED

TAMPA ELECTRIC COMPANY
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INTERROGATORIES
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4-Dec-08	Mar-10		7.62
4-Dec-08	Apr-10		7.11
4-Dec-08	Apr-10		7.11
4-Dec-08	May-10		7.08
4-Dec-08	May-10		7.08
4-Dec-08	Apr-10		7.08
4-Dec-08	Apr-10		7.08
4-Dec-08	Apr-10		7.18
4-Dec-08	Jun-10		7.18
4-Dec-08	Jun-10		7.18
4-Dec-08	Apr-10		7.18
4-Dec-08	Jul-10		7.29
4-Dec-08	Apr-10		7.29
4-Dec-08	Apr-10		7.29
4-Dec-08	Jul-10		7.29
5-Jan-09	Jan-10		7.75
8-Jan-09	Apr-09		6.01
8-Jan-09	Apr-09		6.07
8-Jan-09	Apr-09		6.19
8-Jan-09	Dec-09		7.12
13-Jan-09	Nov-09		6.33
17-Feb-09	Feb-10		6.21
27-Feb-09	Nov-09		5.28
27-Feb-09	Dec-09		5.85
31-Mar-09	Mar-10		5.76
15-Apr-09	Mar-10		5.81
15-Apr-09	Apr-10		5.63
21-Apr-09	Aug-09		3.91
21-Apr-09	Sep-09		3.99
21-Apr-09	Nov-09		4.82
21-Apr-09	Dec-09		5.53
22-Apr-09	Aug-09		3.91
22-Apr-09	Sep-09		3.99
22-Apr-09	Oct-09		4.13
22-Apr-09	Oct-09		4.13
22-Apr-09	Apr-10		5.60
22-Apr-09	Apr-10		5.64
22-Apr-09	Apr-10		5.75
22-Apr-09	Apr-10		5.88
23-Apr-09	Oct-09		4.02
24-Apr-09	Oct-09		3.91
30-Apr-09	Aug-09		3.64
7-May-09	Sep-09		4.38

REDACTED

TAMPA ELECTRIC COMPANY
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INTERROGATORIES
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7-May-09	Oct-09		4.51
19-May-09	Sep-09		4.25
21-May-09	Jan-10		5.85
21-May-09	Feb-10		5.89
21-May-09	Feb-10		5.89
21-May-09	Mar-10		5.85
21-May-09	Mar-10		5.85
22-May-09	Apr-10		5.65
22-May-09	May-10		5.71
22-May-09	Jun-10		5.82
22-May-09	Jul-10		5.94
1-Jun-09	Mar-10		6.21
28-Jul-09	Oct-09		3.92
28-Jul-09	Jan-10		5.58
31-Jul-09	Sep-09		3.65
14-Aug-09	Sep-09		3.24
14-Aug-09	Oct-09		3.64
14-Aug-09	May-10		5.59
17-Aug-09	Nov-09		4.41
18-Aug-09	Dec-09		5.11
18-Aug-09	Dec-09		5.11
18-Aug-09	Feb-10		5.44
21-Aug-09	Jun-10		5.51
3-Sep-09	Dec-09		4.51
3-Sep-09	Jun-10		5.08
3-Sep-09	Jul-10		5.21
9-Sep-09	Mar-10		4.98
9-Sep-09	Mar-10		4.98
9-Sep-09	Apr-10		4.99
9-Sep-09	Apr-10		4.99
9-Sep-09	May-10		5.05
9-Sep-09	May-10		5.05
2-Oct-09	Nov-09		4.72
2-Oct-09	Nov-09		4.72
2-Oct-09	Dec-09		5.52
2-Oct-09	Nov-09		5.52
2-Oct-09	Nov-09		5.82
2-Oct-09	Nov-09		5.87
2-Oct-09	Nov-09		5.82
13-Oct-09	Feb-10		5.88
13-Oct-09	Feb-10		5.88
13-Oct-09	Jul-10		6.01
14-Oct-09	Apr-10		5.68

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14-Oct-09	Apr-10		5.74
14-Oct-09	Apr-10		5.82
14-Oct-09	Apr-10		5.91
23-Oct-09	Jan-10		5.81
23-Oct-09	Jan-10		5.81
23-Oct-09	Jan-10		5.87
23-Oct-09	Jan-10		5.81
23-Oct-09	Jan-10		5.78
23-Oct-09	Jan-10		5.81
23-Oct-09	Jan-10		5.88
23-Oct-09	Jan-10		5.97
27-Oct-09	Jun-10		5.74
27-Oct-09	Jul-10		5.83
6-Nov-09	Jul-10		5.31
6-Nov-09	Jul-10		5.31
6-Nov-09	Jul-10		5.31
21-Dec-09	Mar-10		5.69
24-Dec-09	Feb-10		5.88
11-Jan-10	Apr-10		5.41
11-Jan-10	Apr-10		5.41
11-Jan-10	Apr-10		5.41
27-Jan-10	Apr-10		5.21
27-Jan-10	Apr-10		5.21
27-Jan-10	Apr-10		5.21
23-Feb-10	May-10		4.88
23-Feb-10	May-10		4.88
23-Feb-10	May-10		4.88
23-Feb-10	May-10		4.88
23-Feb-10	May-10		4.88
23-Feb-10	May-10		4.88
11-Mar-10	Jun-10		4.58
11-Mar-10	Jun-10		4.58
15-Mar-10	Jun-10		4.54
15-Mar-10	Jun-10		4.54
17-Mar-10	Jun-10		4.44
17-Mar-10	Jun-10		4.44
25-Mar-10	Jun-10		4.10
31-Mar-10	May-10		3.87
31-Mar-10	Jun-10		3.97
31-Mar-10	Jul-10		4.08
8-Apr-10	May-10		3.91
8-Apr-10	Jun-10		4.01
8-Apr-10	Jul-10		4.14

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27-Apr-10	Jul-10		4.44
4-May-10	Jun-10		4.01
4-May-10	Jul-10		4.13
4-May-10	Jul-10		4.13
4-May-10	Jul-10		4.13
10-May-10	Jun-10		4.17

- b. Tampa Electric does not hedge oil as it represents less than one percent of the company's generation mix.
- c. Deals that settled for greater than five percent of the fixed price were purchased on a calendar strip, which is a set of deals purchased in one increment that cover a span of time. The rate paid is for the entire strip and does not correlate to a particular day in the market.
- d. Tampa Electric did not enter into options.
- e. Tampa Electric did not enter into options.
- f. Not applicable

REDACTED

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37. Please state the realized hedging gains and losses by fuel type and by type of hedging instrument for the twelve months beginning August 1, 2009, and ending July 31, 2010.

A. The following data reflects Tampa Electric's Annual Risk Management Report and Hedging Information Report as revised on August 31, 2010.

	Type of Hedge	Mark-to-Market Saving/(Loss)	Hedged Volume (MMBTU)	Consumption (MMBTU)	Percent Hedged (%)	Budget Price (\$)	Hedge Price (\$)	Settle Price (\$)
Aug-09	Swaps	(17,579,555)		6,659,526				3.38
Sep-09	Swaps	(19,322,740)		5,622,355				2.84
Oct-09	Swaps	(13,152,300)		5,747,035				3.73
Nov-09	Swaps	(8,090,850)		2,906,655				4.29
Dec-09	Swaps	(13,396,350)		4,307,603				5.81
Jan-10	Swaps	(4,236,240)		6,279,331				5.81
Feb-10	Swaps	(4,894,900)		5,552,378				5.27
Mar-10	Swaps	(5,526,580)		3,457,509				4.82
Apr-10	Swaps	(6,626,300)		4,822,245				3.84
May-10	Swaps	(6,343,380)		6,440,429				4.27
Jun-10	Swaps	(6,789,150)		6,268,450				4.16
Jul-10	Swaps	(6,010,740)		5,678,013				4.72
Total		(111,969,085)		63,741,529				

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- 38.** For the twelve months beginning August 1, 2009, and ending July 31, 2010, for each month that hedged volumes of fuel oil or natural gas were outside the percentage range for volumes to be hedged stated in TECO's risk management plan or otherwise stated in internal procedures governing TECO's hedging activities, please state the month, the extent to which the volume hedged was outside of the range, and an explanation of the cause.
- A.** Weather and unit outages affect the amount of natural gas consumed, thereby creating the variances. For September through December 2009 the hedged volumes were within the Risk Authorization Committee ("RAC") approved limits relative to Tampa Electric's midcourse projection filed on March 5, 2009. For January and March 2010, the hedged volumes were within the approved limits relative to the company's annual fuel projection filed September 1, 2009. For each of these instances, the actual natural gas consumption was lower than projected.

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- 39.** Please supply a comparison of TECO's Risk Management Plans for 2010 and 2011. Please explain or describe any changes between 2010 and 2011.
- A.** There are no material changes between Tampa Electric's risk management plans for 2010 and 2011. For 2011, Tampa Electric plans to hedge using the same products, time horizons, and percentages as used in 2010.

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- 40.** Regarding hedging activities, please explain or describe how TECO assesses and evaluates counter-party credit risk?
- A.** Pursuant to Tampa Electric's Risk Management Plan, filed on August 2, 2010, the company's Risk Oversight Group negotiates the acceptable terms for each financial counterparty relationship, monitors and verifies internal daily transactions, establishes the credit underwriting and credit exposure standards, as well as monitors and evaluates the counterparty's credit limit to ensure internal thresholds are maintained.

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- 41.** For open hedging transactions since August 1, 2009, has TECO experienced any defaults by a counter-party? If so, please identify the counter-party and explain the reason for the default(s).
- A.** No defaults by counterparties have occurred.

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- 42.** For realized hedging transactions since August 1, 2009, did TECO experience any defaults by a counter-party? If so, please identify the counter-party and explain the reason for the default(s).
- A.** No defaults by counterparties have occurred.

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43. For all currently open hedging transactions, does TECO have any concern regarding default by a counter-party for any specific transaction? If so, please identify the counter-party and explain.
- A. No. Tampa Electric does not have concerns regarding default by any specific transaction. The company attempts to mitigate the credit risks associated with hedging through credit analysis and monitoring.

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- 44.** Since January 1, 2009, has TECO stopped engaging in hedging transactions with a particular counter-party due to credit risk concerns? If so, please identify the counter-party and explain.
- A.** Yes. In June 2010, Tampa Electric stopped engaging in hedging transactions with British Petroleum ("BP") as a result of the Deep Water Horizon oil spill and the uncertain effects it would have on BP's financial stability. At this time Tampa Electric has not determined when it will resume hedging activities with BP.

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- 45.** Based on TECO's current understanding, please explain or describe how the Dodd-Frank Wall Street Reform and Consumer Protection Act affects TECO's hedging activities?
- A.** Tampa Electric anticipates receiving an end user exemption which would not require the company to clear its transactions through a central exchange. Due to the uncertainty associated with the implementation of the Dodd-Frank Wall Street Reform and Consumer Protection Act by the Commodity Futures Trading Commission, Tampa Electric is unsure of the impact the reform will have on its current or future potential counterparties.

A F F I D A V I T

STATE OF FLORIDA)
)
COUNTY OF HILLSBOROUGH)

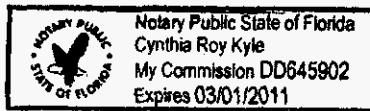
Before me the undersigned authority personally appeared Carlos Aldazabal who deposed and said that he is a Director, Regulatory Affairs at Tampa Electric Company, and that the individual(s) listed in Tampa Electric Company's response to Staff's Fourth Set of Interrogatories, (Nos. 36 - 45) prepared or assisted with the responses to these interrogatories to the best of his information and belief.

Dated at Tampa, Florida this 29th day of September, 2010.

Carlos Aldazabal

Sworn to and subscribed before me this 29th day of September, 2010.

Cynthia Roy Kyle



My Commission expires _____

REQUESTED DURATION OF CONFIDENTIAL CLASSIFICATION

Tampa Electric requests that the Confidential Information that is the subject of this request be treated as proprietary confidential business information exempt from the Public Records Law for a minimum of 18 months from the date of the order granting such classification. To the extent the company needs confidential protection of the Confidential Information for a period longer than 18 months, the company's justification therefor is set forth below:

n/a

Exhibit "C"

DOCUMENT NUMBER-DATE

08176 SEP 30 9

FPSC-COMMISSION CLERK

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

James D. Beasley
P.O. Box 391
Tallahassee FL 32301

Re: Acknowledgement of Confidential Filing in Docket No. 100001-EI

This will acknowledge receipt by the Florida Public Service Commission, Office of Commission Clerk, of a **CONFIDENTIAL DOCUMENT** filed on September 30, 2010, in the above-referenced docket.

Document Number 08175-10 has been assigned to this filing, which will be maintained in locked storage.

If you have any questions regarding this document, please contact Kim Peña, Records Management Assistant, at (850) 413-6393.