

AUSLEY McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

123 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

April 18, 2019

HAND DELIVERED

Mr. Adam J. Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Review of 2019-2021 storm hardening plan, Tampa Electric Company
FPSC Docket No. 20180145-EI

Dear Mr. Teitzman:

Enclosed for filing in the above docket are the original and seven (7) copies of Tampa Electric Company's Request for Confidential Classification of all of the information contained in the company's answer to Staff's Third Data Request (No. 23).

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
Enclosure

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

RECEIVED-FPSC

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COMMISSION CLERK

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2019-2021 storm)
hardening plan, Tampa Electric Company.)
_____)

DOCKET NO. 20180145-EI

FILED: April 18, 2019

**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)

The document entitled "Tampa Electric Company Electric Delivery Emergency Management Incident Response Plan, Dated December, 2018", submitted in response to Staff's Third Data Request No. 23 (the "Confidential Information"). In support of this request, the company states: 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 Act]." Proprietary confidential business information includes, but is not limited to "[s]ecurity measures, systems or procedures." The Confidential Information that is the subject of this

request and motion falls within this statutory category and, thus, constitutes proprietary 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. The entire Plan is entitled to confidential treatment given the fact that the confidential information regarding security measures, systems and procedures is spread throughout the Plan in text format. Unlike spread sheets of numbers where specific confidential numbers can be pinpointed for confidential treatment, there are no specific portions of the Plan that can be highlighted and redacted and separated from the rest of the Plan for confidential treatment. The entire Plan is an integral plan of action, all of which is entitled to confidential protection. Accordingly, the company has printed the entire Plan on yellow paper stock to designate its sensitivity in its entirety, and includes as Exhibit "B" a "placeholder" page indicating that the entire Plan is redacted.

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 18th day of April 2019.

Respectfully submitted,



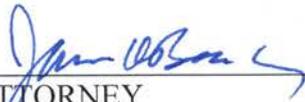
JAMES D. BEASLEY
jbeasley@ausley.com
J. JEFFRY WAHLEN
jwahlen@ausley.com
MALCOLM N. MEANS
mmeans@ausley.com
Ausley McMullen
Post Office Box 391
Tallahassee, Florida 32302
(850) 224-9115

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 electronic mail on this 18th day of April, 2019 to the following:

Jennifer Crawford
Walter Trierweiler
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850



ATTORNEY

**JUSTIFICATION FOR CONFIDENTIAL TREATMENT OF
HIGHLIGHTED PORTIONS OF TAMPA ELECTRIC'S REPORT**

| <u>Page</u> | <u>Description</u> | <u>Rationale</u> |
|--------------------------|-----------------------------|-------------------------|
| Bates stamp pages 26-130 | All highlighted information | (1) |

- (1) The Tampa Electric Company Electric Delivery Emergency Management Incident Response Plan, dated December 2018, (the "Plan") is replete with information regarding Tampa Electric's security measures, systems and procedures the company plans to use in the aftermath of named storms or other disasters causing major damage to the company systems. The Plan sets forth detailed restoration actions, prioritizations, logistics, and all manner of operational details of how Tampa Electric, in coordination with Peoples Gas System and other assistance providers, would go about restoring service to the company's customers in the aftermath of a disaster causing major damage to the company's systems. Anyone wishing to take advantage of a major power outage in furtherance of criminal activity or to engage in price gouging or to otherwise enrich themselves at the expense of the public could find details in the Plan useful in planning and executing those activities. Section 366.093(3)(c), Florida Statutes, provides that proprietary confidential business information includes, but is not limited to: "(c) Security measures, systems, or procedures." As such the confidential information in question is entitled to confidential treatment under Section 366.093(3)(c), Florida Statutes and is entitled to the entry of a temporary protective order on the same ground.

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) will be submitted under a separate filing _____

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

Note: Tampa Electric considers its entire Plan to be confidential proprietary business information and thus redacted in its entirety.

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