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April 11, 2024

### **VIA ELECTRONIC FILING**

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

Re: Docket No. 20240026-EI; Petition for Rate Increase by Tampa Electric Company

Dear Mr. Teitzman:

Attached for filing in the above docket is Tampa Electric Company's Notice of Intent to Request Confidential Classification pertaining to portions of the company's responses to the Office of Public Counsel's First Set of Interrogatories and First Request for Production of Documents, propounded on March 12, 2024.

Thank you for your assistance in connection with this matter.

Sincerely,

Virginia Ponder

VLP/ne Attachment

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

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase by Tampa

Electric Company

DOCKET NO. 20240026-EI

FILED:

April 11, 2024

TAMPA ELECTRIC COMPANY'S NOTICE OF INTENT TO REQUEST CONFIDENTIAL CLASSIFICATION

Tampa Electric Company ("Tampa Electric" or the "company"), pursuant to Section

366.093, Florida Statutes, and Rule 25-22.006(3)(a), Florida Administrative Code, hereby files

this Notice of Intent to Request Confidential Classification for portions of its answers to Office of

Public Counsel's ("OPC") First Set of Interrogatories (Nos. 1-49) and responses to OPC's First

Request for Production of Documents (Nos. 1-30). Portions of these answers and responses

constitute "proprietary confidential business information" as defined in Section 366.093, Florida

Statutes.

Pursuant to Rule 25-22.006(3)(a) and (d), Florida Administrative Code, Tampa Electric

respectfully requests confidential handling of the material identified in Exhibit A, which is

comprised of portions of the company's answers to OPC's First Set of Interrogatories (Nos. 1-49)

and responses to OPC's First Request for Production of Documents (Nos. 1-30), while the

company reviews that material, identifies which components constitute proprietary confidential

business information, and prepares a Request for Confidential Classification. Tampa Electric will

file such a Request specifying the information entitled to confidential treatment within twenty-one

days in accordance with Rule 25-22.006(3)(a)1, Florida Administrative Code.

DATED this 11<sup>th</sup> day of April 2024.

# Respectfully submitted,

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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

#### **EXHIBIT A**

### OPC's 1st Set of Interrogatories (Nos. 1-49)

- 10. Payroll. Please provide the percentage wage and salary increases implemented by Tampa Electric Company by date and employee category for each year 2021 through 2023, 2024 to date and budgeted/forecast for each year 2024 through 2027.
- 20. Executive Compensation. Please provide a listing of the total compensation of each corporate officer of Tampa Electric Company or any other entity whose executive compensation costs are charged or allocated to Tampa Electric Company for 2020 through 2023 (and projected amounts for the same cost for 2024, and 2025). Indicate the separate amount charged to O&M expense and capitalized, and breakdown the total compensation by type including, but not limited to, salary, deferred compensation, stock options, vehicle allowances, etc.
- 29. Internal Audits. Please provide a list of all Tampa Electric Company internal audit reports for 2021 through 2023.

## **OPC's 1st Request for Production (1-30)**

- 2. Please provide documents containing the Company's trial balances for December 31, 2022, December 31, 2024, December 31, 2023, and each month thereafter for which actual information is available, including closing and adjusting entries in unlocked and searchable format.
- 3. Please provide copies of all Tampa Electric Company internal audit reports for 2021 through 2023 in searchable format listed in Interrogatory No. 29.
- 5. Please provide a copy of Tampa Electric Company's pension and post-retirement benefits actuarial studies for each year 2022 through 2025 in unlocked and searchable format.
- 6. Please provide any reports for 2022 to the present by investors services (e.g., Moody's, Standard & Poor's, etc.) relating to the operations of Tampa Electric Company, and Emera Inc., and also provide your presentations to each such investor service for the same period, regardless of whether a report was issued in response to such presentation.
- 7. Please provide the billings for corporate services provided by Tampa Electric Company to the Emera family of companies including all invoices for 2022, 2023 and 2024 to-date in searchable format.
- 9. Please provide a copy of all Tampa Electric Company, Emera US Holdings, Inc., and Emera Board of Directors Meeting minutes and board committee minutes and presentations to the Tampa Electric Company, Emera US Holdings, Inc., and Emera boards in 2022, 2023 and 2024 to-date.
- 10. Please provide the two most recent Florida state and federal consolidated income tax returns of Tampa Electric Company, Emera US Holdings, Inc., and Emera, Inc., if one is prepared, including all supporting forms and attachments.
- 11. Please identify and provide a copy of all requests for private letter rulings submitted by or on behalf of Tampa Electric Company, Emera US Holdings, Inc., and Emera, Inc. in each year, 2021 through the present. Also provide copies of the IRS' responses to the requests for the PLRs in searchable format.
- 12. Please produce any and all documents that support, evidence or relate to your response to OPC's Interrogatory No. 1.
- 20. Please provide all correspondence between any credit rating agency and Tampa Electric Company, and Emera, Incorporated for the years 2022, 2023 and 2024 to date.
- 21. Please provide all copies of business analysis plans (or the functional equivalent), phase project authorization plans and associated presentations for any plant additions, made to the

Board of Directors or Executive Management for approval during the time period 2021 through	
2023 and 2024 to date. Please include any project authorization forms with signatures.	
24.	Please provide copies of the tax sharing agreements between Tampa Electric Company
and its affiliates applicable for 2021 through 2024 to date.	
27.	Please provide all documents identified in OPC's First Set of Interrogatories, No. 46.
28.	Please provide all documents identified in OPC's First Set of Interrogatories, No. 47.
29.	Please provide all documents identified in OPC's First Set of Interrogatories, No. 48.

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Notice of Intent, filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 11<sup>th</sup> day of April, 2024 to the following:

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# Petition to Intervene Pending

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