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TECO's Response to OPC's First  
Production of Documents Nos. 1-3

**(Nos. 1-3; only the non-confidential  
attachments)**

**TAMPA ELECTRIC COMPANY  
DOCKET NO. 20220048-EI  
OPC'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS  
DOCUMENT NO. 1  
BATES PAGES: 1 - 64  
FILED: APRIL 11, 2022**

1. Please provide all analyses and source documents prepared in support of the Company's application, testimony, and expert reports in this proceeding before or contemporaneous with its filing, including all Excel workbooks in live format with all formulas intact in searchable and unlocked format.
  
- A. Tampa Electric is providing the following analyses and source documents that were prepared to support the development of Tampa Electric's application and testimony for the company's 2022-2031 Storm Protection Plan. The file folders containing the analyses and source documents are listed below and are being provided in the Sharepoint site that was created to share documents with the Office of Public Council in this proceeding:
  - 1898 – Model Inputs (Bates 2 – 15)
  - 1898 – Model Outputs (Bates 16 - 30)
  - 1898 – Other Analyses (Bates 31 - 37)
  - 1898 – Program and Project Analysis (Bates 38 - 47)
  - 1898 Report (Bates 48)
  - Cost and Revenue Requirements (Bates 49 - 57)
  - Master Charts (Bates 58)
  - Rate Files (Bates 59 - 62)
  - Substation Hardening Report (Bates 63)
  - Vegetation Management (Bates 64)

Tampa Electric is producing the following Bate Stamped pages that are contained within the folder labeled, "1898 – Model Inputs" as Confidential. This information contains information about the contract terms and rates that are paid for contracted services. This information is competitive contractual information, the disclosure of which would be harmful to the position of Tampa Electric in negotiating future contracting contracts with other third party construction providers. The disclosure of this information would therefore be harmful to Tampa Electric's competitive interests and to the ability of Tampa Electric to contract for goods and services on favorable terms, and as such, the information is entitled to confidential treatment pursuant to Section 366.093(d) and (e), Florida Statutes.

- Bates pages (17 - 18)
- Bates pages (20 – 21)
- Bates pages (25 – 29)
- Bates page (31)

**TAMPA ELECTRIC COMPANY  
DOCKET NO. 20220048-EI  
OPC'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS  
DOCUMENT NO. 2  
BATES PAGES: 65 - 129  
FILED: APRIL 11, 2022**

2. Please provide all analyses and underlying support for all schedules, exhibits, tables, and graphs included in and/or attached to the Company's testimonies and expert reports in this proceeding prepared before or contemporaneous with its filing, including all Excel workbooks in live format with all formulas intact in searchable and unlocked format.
- A. Tampa Electric is providing the following analyses and underlying support for all schedules, exhibits, tables, and graphs included in and/or attached to Tampa Electric's 2022-2031 Storm Protection Plan. The file folders containing the schedules, exhibits, tables, and graphs are listed below and are being provided in the Sharepoint site that was created to share documents with the Office of Public Council in this proceeding:
- 1898 – Model Outputs (Bates 66 - 80)
  - 1898 – Other Analyses (Bates 81 – 87)
  - 1898 – Program and Project Analysis (Bates 88 -97)
  - 1898 Report (Bates 98)
  - Cost and Revenue Requirements (Bates 99 - 107)
  - Dave Plusquellic Exhibits (Bates 108 – 115)
  - Jason – Report and Testimony Figures and Tables (Bates 116 - 124)
  - Master Charts (Bates 125)
  - Rate Files (Bates 126 – 128)
  - Sloan Lewis Exhibits (Bates 129)

Tampa Electric is producing the following Bate Stamped pages that are contained within the folder labeled, "1898 – Model Inputs" as Confidential. This information contains information about the contract terms and rates that are paid for contracted services. This information is competitive contractual information, the disclosure of which would be harmful to the position of Tampa Electric in negotiating future contracting contracts with other third party construction providers. The disclosure of this information would therefore be harmful to Tampa Electric's competitive interests and to the ability of Tampa Electric to contract for goods and services on favorable terms, and as such, the information is entitled to confidential treatment pursuant to Section 366.093(d) and (e), Florida Statutes.

- Bates pages (67 – 68)
- Bates pages (70 – 71)
- Bates pages (75 – 79)
- Bates page (81)

**TAMPA ELECTRIC COMPANY  
DOCKET NO. 20220048-EI  
OPC'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS  
DOCUMENT NO. 3  
BATES PAGES: 130 - 133  
FILED: APRIL 11, 2022**

- 3.** Please provide any and all documents relating to or referenced in Interrogatories 1-32.
- A.** Tampa Electric is providing the following documents related to Interrogatories No. 2 and No. 3. The files are listed below and are being provided in the Sharepoint site that was created to share documents with the Office of Public Council in this proceeding:
- IRR 2 SPP Lug Change Log
  - IRR 2 and 3 SPPCRC 2022 Discovery Est vs Actuals
  - IRR 3 SPP Actuals – 2020 2021