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ORIGINAL
FILE COPY

June 9, 1997

HAND DELIVERED

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Determination of appropriate cost allocation and regulatory treatment of total revenues associated with wholesale sales to Florida Municipal Power Agency and City of Lakeland by Tampa Electric Company;
FPSC Docket No. 970171-EU

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Request for Specified Confidential Treatment of certain information supplied by Tampa Electric to the Commission in response to Staff's First Request for Production of Documents (Request No. 2).

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

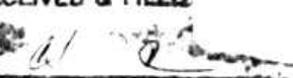
Thank you for your assistance in connection with this matter.

Sincerely,


James D. Beasley

JDB/pp
Enclosures

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

RECEIVED & FILED

FPSC BUREAU OF RECORDS

DOCUMENT NO. - DATE
05718 JUN-97
FPSC BUREAU OF RECORDS

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Determination of appropriate)
cost allocation and regulatory)
treatment of total revenues associated)
with wholesale sales to Florida)
Municipal Power Agency and City of)
Lakeland by Tampa Electric Company.)

DOCKET NO. 970171-EU
FILED: June 9, 1997

**TAMPA ELECTRIC COMPANY'S
REQUEST FOR CONFIDENTIAL TREATMENT**

Pursuant to Section 336.093, Fla. Stat., Tampa Electric Company ("Tampa Electric" or "the company"), submits the following Request for Confidential Treatment of certain information supplied by Tampa Electric to the Commission in response to Staff's First Request for Production of Documents to Tampa Electric Company (Request No. 2), and as grounds therefor, says:

1. On May 19, 1997 Tampa Electric submitted a Notice of Intent to Request Confidential Classification of four pages contained in the company's response to Staff's First Request for Production of Documents (Request No. 2). The confidential documents in question were filed on May 19, 1997 with the Division of Records and Reporting, pursuant to Rule 25-22.006(3)(a), Fla. Admin. Code.

2. The pages in question are pages 2 of 7, 3 of 7, 5 of 7 and 6 of 7 of the company's response. This request is a follow up within 21 days of the Notice of Intent to Request Confidential Classification.

3. On May 28, 1997 Tampa Electric filed its supplement to Notice of Intent to Request Confidential Classification. In that

DOCUMENT NUMBER-DATE

05718 JUN-95

FPSC-RECORDS/REPORTING

Notice the company pointed out that it was filing with the Commission on that date revised pages 5 of 7 and 6 of 7 (marked Bates' Stamp pages 42 and 43 at the bottom) and that the company would submit its Request for Confidential Classification for these revised pages when it submits its Request for Confidential Classification pursuant to the original Notice of Intent to request such treatment.

4. Tampa Electric submitted under two separate confidential cover letters a copy each of the confidential versions of pages 2 of 7, 3 of 7, 5 of 7 and 6 of 7 of the company's response and revised pages 5 of 7 and 6 of 7. These confidential versions have the confidential information highlighted with the column and line numbers included.

5. Attached hereto as Exhibit "A" is a detailed justification for the requested confidential treatment of the highlighted portions of the above-referenced document.

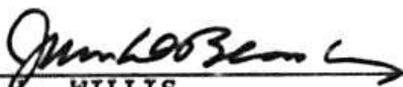
6. Tampa Electric requests that the information for which it seeks confidential classification not be declassified at all, but that the information in question be returned to Tampa Electric at the conclusion of this proceeding as contemplated in the Order Establishing Procedure, at page 2, and in the Draft Prehearing Order at pages 3-4.

7. The material for which classification is sought is intended to be and is treated by Tampa Electric as private and has not been disclosed.

WHEREFORE, for the reasons set forth in Exhibit "A" hereto, Tampa Electric requests that the confidential versions of the above-referenced confidential filings be treated as confidential proprietary business information and exempt from the Public Records Law, and that the documents in question be returned to Tampa Electric at the conclusion of this proceeding as contemplated in the Order Establishing Procedure and in the Draft Prehearing Order.

DATED this 9th day of June, 1997.

Respectfully submitted,



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HARRY W. LONG, JR.
TECO Energy, Inc.
Post Office Box 111
Tampa, Florida 33601-0111

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Request for Confidential Classification, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand deliver (*) on this 9th day of June, 1997 to the following:

Ms. Leslie Paugh*
Staff Counsel
Division of Legal Services
Florida Public Service
Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

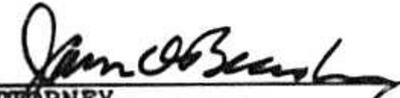
Mr. Gary Lawrence
City of Lakeland
501 East Lemon Street
Lakeland, FL 33801-5079

Ms. Vicki Gordon Kaufman
McWhirter, Reeves, McGlothlin,
Davidson, Rief & Bakas, P.A.
117 South Gadsden Street
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7201 Lake Ellinor Drive
Orlando, FL 32809

Mr. John Roger Howe
Office of Public Counsel
c/o The Florida Legislature
111 West Madison St., Room 812
Tallahassee, FL 32399-1400



ATTORNEY

TAMPA ELECTRIC COMPANY

DOCKET NO. 970171-EU

June 9, 1997

Justification for Confidentiality of Pages 2 of 7, 3 of 7, 5 of 7 (both the original and "Revised: May 28, 1997") and 6 of 7 (both the original and "Revised: May 28, 1997") of the Company's Response to Staff's First Request for Production of Documents to Tampa Electric Company (Request No. 2)

<u>PAGE NO.</u>	<u>COLUMN NO.</u>	<u>LINE NO.</u>	<u>RATIONALE</u>
Page 2 of 7 (Bates Stamp page 39)	(f)	(7)-(11)	(1)
Page 2 of 7	(g),(j)	(7)-(11)	(2)
Page 3 of 7 (Bates Stamp page 40)	(e),(i), (j),(k)	(1)-(5)	(2)
Page 5 of 7 (Bates Stamp page 42) Both the original filing and the filing marked "Revised May 28, 1997"	(f)	(12)-(21)	(3)
Page 5 of 7	(g),(j)	(12)-(21)	(2)
Page 6 of 7 (Bates Stamp page 43) Both the original filing and the filing marked "Revised May 28, 1997"	(e),(i), (j),(k)	(1)-(10)	(2)

Rationale for Confidentiality

- (1) The information shown is Tampa Electric's best estimate as to its incremental cost of fuel by year for 1997 through the year 2001 in connection with the FMPA off-system sales. This is highly sensitive information that would be especially useful to those who compete against Tampa Electric Company to sell power at wholesale to present and prospective wholesale customers of Tampa Electric. The information would enable those parties to structure bids, offers and negotiations in such a way as to prevail over Tampa Electric's offers, bids and negotiations to provide wholesale electric power. The

information would similarly be useful from a competitive standpoint to present and potential wholesale customers of Tampa Electric in their negotiations with Tampa Electric to provide wholesale power. These contracts involve negotiations -- not simply a determination of the lowest bid.

This information would also be useful to large industrial customers of Tampa Electric who might desire to negotiate lower rates for electricity supplied by the company. Tampa Electric presently is actively engaged in negotiations with one of its large industrial customers over this very issue. Arming the customer in question with this type of information would work to the detriment of Tampa Electric and its general body of ratepayers. This was recognized by the Prehearing Officer in this proceeding as the basis for granting Tampa Electric's Motion for a Protective Order precluding certain representatives of the industrial customer in question from having access to the company's projected incremental fuel cost.

The company's incremental fuel cost projections represent information concerning bids or other contractual data, the disclosure of which would impair the efforts of Tampa Electric to contract for goods or services on favorable terms. It is also information relating to competitive interests, the disclosure of which would impair the competitive business of Tampa Electric. As such, the information in question is entitled to confidential treatment under Section 366.093(3)(d) and (e), Florida Statutes.

- (2) This information, when used with other information publicly disclosed on the schedules that are the subject of this request, would enable one to easily calculate the confidential projected year-by-year incremental fuel cost information the company seeks to protect from public disclosure. As such, this information is entitled to confidential treatment under Section 366.093, Fla. Stat., in order to prevent someone from backing into the confidential projected cost information.
- (3) The information shown is Tampa Electric's best estimate as to its incremental cost of fuel by year for 1997 through the year 2006 in connection with the Lakeland off-system sales. This is highly sensitive information that would be especially useful to those who compete against Tampa Electric Company to sell power at wholesale to present and prospective wholesale customers of Tampa Electric. The information would enable those parties to structure bids, offers and negotiations in such a way as to prevail over Tampa Electric's offers, bids and negotiations to provide wholesale electric power. The information would similarly be useful from a competitive standpoint to present and potential wholesale customers of Tampa Electric in their negotiations with Tampa Electric to

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