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

December 8, 2011

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; Staff's Audit Work Papers Pursuant
to Audit Control No. 11-129-2-3; FPSC Docket No. 110001-EI
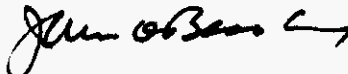
Dear Ms. Cole:

On October 18, 2011 we submitted two copies of redacted public versions of confidential documents which we filed on behalf of Tampa Electric Company on October 17, 2011 (Document No. 07605-11). We have been advised by the Commission's Staff that two columns on four pages of the redacted versions which should have been redacted were not. We were also afforded the opportunity to submit revised redacted versions of the four pages in question which redact the price and quantity columns that inadvertently were not redacted in the original filing.

Enclosed are two copies each of revised redacted pages 63-7 (pages 10, 11, 13 and 14) which we ask that you substitute in place of the corresponding pages in the original filing. We also request that those original pages be returned to the undersigned.

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

COM _____
APA _____ JDB/pp
ECR __/__ Enclosure
GCL _____
RAD _____ cc: All parties of record (w/o enc.)
SRC _____   Hyma Vedula (w/enc.)
ADM _____
OPC _____
CLK _____

TECO Energy, Inc.
Sarbanes-Oxley 2010
A21. Derivatives and Hedging

Purpose: A21-02. The Middle Office analyst reconciles the transaction parameters saved in Nucleus to the details on the deal blotter for each completed transaction.

Source: Adam Djak, Middle Office Analyst

Risk: 05. (High) Errors in the deal entry may go undetected and deals entered into by traders may not be included in the Nucleus system.

Frequency: Multiple

Population: > 250

Sample: 60 (15 in Q4)

Test Plan: For the appropriate sample size, obtain the Daily Trade Report and the Daily Trade Blotter for each of the selected deals. (A) Verify that the selected deal on the Daily Trade Report was supported by a trade on the Daily Trade Blotter. (B) Verify that the selected trade evidenced a checkmark or notations by the Middle Office Analyst on the related Daily Trade Blotter, indicating agreement to the respective Daily Trade Report. (C) Verify that the selected trade's details in the Daily Trade Report matched the details on the respective Daily Trade Blotter or other applicable supporting document.

#	Deal	Trade Date	Start Date	End Date		A	B	C
1	56775	1/4/10	1/5/10	1/5/10		X	X	X
2	57073	1/8/10	1/9/10	1/11/1		X	X	X
3	57006	1/12/10	1/13/10	1/13/1		X	X	X
4	57062	1/15/10 - 1	1/9/10	1/11/1		X	X	X
5	57108	1/20/10 - 1	1/10/10	1/11/1		X	X	X
6	57173	1/26/10	2/1/10	2/28/1		X	X	X
7	57189	1/29/10	1/30/10	1/30/1		X	X	X
8	57209	2/2/10 - 1	1/12/10	1/12/1		X	X	X
9	57264	2/9/10	2/10/10	2/10/1		X	X	X
10	57314	2/10/10	2/11/10	2/11/1		X	X	X
11	57411	2/16/10	2/17/10	2/17/1		X	X	X
12	57519	2/19/10	2/20/10	2/22/1		X	X	X
13	57566 - 2	2/23/10	4/1/10	10/30/1		X	X	X
14	57695	2/26/10	2/26/10	2/28/1		X	X	X
15	57702	3/3/10	3/3/10	3/3/10		X	X	X
16	57801	3/8/10	3/9/10	3/9/10		X	X	X
17	57839	3/11/10	3/12/10	3/12/1		X	X	X
18	57862	3/16/10	3/17/10	3/17/1		X	X	X
19	57876	3/18/10	3/18/10	3/18/1		X	X	X
20	57901	3/23/10 - 1	3/22/10	3/22/10		X	X	X
21	57971	3/31/10	4/1/10	4/1/10		X	X	X
22	57996	4/1/10	4/2/10	4/5/10		X	X	X
23	58014	4/7/10	4/8/10	4/8/10		X	X	X
24	58034	4/12/10	4/13/10	4/13/10		X	X	X
25	58074	4/16/10	4/17/10	4/19/10		X	X	X
26	58120	4/21/10	4/22/10	4/22/10		X	X	X
27	58152	4/26/10	4/27/10	4/27/10		X	X	X
28	58185	4/29/10	4/30/10	4/30/10		X	X	X
29	58264	5/4/10	5/4/10	5/4/10		X	X	X
30	58337	5/7/10	5/8/10	5/10/10		X	X	X
31	58452	5/14/10	5/15/10	5/17/10		X	X	X
32	58500	5/19/10	5/20/10	5/20/10		X	X	X
33	58510	5/20/10	5/21/10	5/21/10		X	X	X
34	58532	5/24/10	5/25/10	5/25/10		X	X	X
35	58598	5/27/10	5/28/10	5/31/10		X	X	X
36	58786	6/8/10	6/9/10	6/9/10		X	X	X
37	59285	6/13/10	6/13/10	6/30/10		X	X	X
38	58904	6/14/10	6/15/10	6/15/10		X	X	X
39	58981	6/16/10	6/17/10	6/17/10		X	X	X
40	58992	6/17/10	6/18/10	6/18/10		X	X	X
41	59052	6/21/10	6/22/10	6/22/10		X	X	X
42	59281	6/23/10	6/24/10	6/24/10		X	X	X
43	59116	6/24/10	6/25/10	6/25/10		X	X	X
44	59154	6/28/10	6/29/10	6/29/10		X	X	X
45	59166	6/29/10	6/30/10	6/30/10		X	X	X
46	60866	10/1/10	10/2/10	10/4/10		X	X	X
47	14403	10/1/10	1/1/11	1/31/11		X	X	X
48	14406	10/6/10	11/1/11	3/31/12		X	X	X
49	60881	10/6/10	10/7/10	10/7/10		X	X	X
50	60883	10/11/10	10/12/10	10/12/10		X 63-7 X	X
		10/1/10	10/2/10	10/4/10		X of X	X	X

SOURCE: As Referenced

SOURCE: As Referenced

63-7
10 08 18

REDACTED

52	14413	1../13/10	7/1/11	7/31/11		X	X	X
53	60903	10/13/10	11/1/10	10/31/11		X	X	X
54	60912	10/18/10	10/19/10	10/19/10		X	X	X
55	60913	10/18/10	10/18/10	10/18/10		X	X	X
56	60976	10/21/10	10/22/10	10/22/10		X	X	X
57	60978	10/21/10	10/22/10	10/22/10		X	X	X
58	60985	10/26/10	10/27/10	10/27/10		X	X	X
59	60972	10/26/10	10/27/10	10/27/10		X	X	X
60	61063	10/29/10	11/1/10	11/1/10		X	X	X

Tickmark Explanations:

X - Attribute met, w/o/e.

1 - Per Adam Djak, Middle Office Analyst, these trades are to supply/buy fuel for over/under burns. Since the terms of the deal are not known until the meter has been read, the trade date is subsequent to the start and end date. Explanation appears reasonable; not an exception.

2 - Per review of the Daily Trade Report, it was noted that several deal numbers were listed multiple times. Per discussion with Adam Djak, Middle Office Analyst, it was noted that the deal was scheduled on two different delivery points, and therefore, was split into multiple quantities on the Daily Trade Report. It was noted that the sum of these multiple quantities equaled the quantity per the Daily Trade Blotters. Explanation appears reasonable; not an exception.

Work Performed:

Matt Elliott judgmentally selected 60 (15 in Q4) Daily Trade Reports and the corresponding Daily Trade Blotters to test. Verified that the selected deal on the Daily Trade Report was supported by a trade on the Daily Trade Blotter. Verified that the selected trade evidenced a checkmark or notations by the Middle Office Analyst (Adam Djak) on the related Daily Trade Blotter, indicating agreement to the respective Daily Trade Report. Verified that the selected trade's details in the Daily Trade Report matched the details on the respective Daily Trade Blotter.

Results:

Audit Services considers the control to be operating effectively.

CONFIDENTIAL

Interim:
Prepared by: MEE 9/10/10
Reviewed by: MLC 9/24/10

Q4:
Prepared by: MEE 11/10/10
Reviewed by: LJO 12/2/10

Year-end:
Prepared by: N/A
Reviewed by: N/A

REDACTED

Purpose: A21-07. Any confirmations generated for transactions with delivery dates beyond the next business day are sent or received via fax and verified by the Middle Office analyst against Nucleus.

Source: Adam Dyak, Middle Office Analyst

Risk: 09. (High) Financial loss due to failure to achieve final resolution on discrepancies appearing on confirmations in a timely manner.

Frequency: Multiple

Population: > 250

Sample: 60 (15 in Q4)

Test Plan: From the Daily Trade Reports, select the appropriate sample size of confirmations for deals with delivery dates beyond the next business day to test. (A) Review the confirmations for tickmarks addressing the reconciliation between Nucleus and the actual confirmation. (B) Agree the terms of the confirmation (company, deal #, trade date, etc.) to the Daily Trade Report or the equivalent Nucleus screenprint.

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1	11668	1/4/10	1/5/10	1/7/10					
2	11671	1/4/10	1/5/10	1/31/10				X	X
3	11670	1/5/10	1/6/10	1/7/10				X	X
4	11672	1/5/10	1/6/10	1/31/10				X	X
5	56799	1/5/10	1/6/10	1/11/10				X	X
6	14183	1/11/10	4/1/10	4/30/10				X	X
7	14184	1/11/10	4/1/10	4/30/10				X	X
8	14185	1/11/10	4/1/10	4/30/10				X	X
9	11679	1/13/10	2/1/10	2/28/10				X	X
10	57054	1/15/10	1/16/10	1/19/10				X	X
11	57500	2/18/10	3/1/10	9/30/10				X	X
12	57522	2/19/10	3/1/10	3/31/10				X	X
13	57523	2/19/10	3/1/10	3/31/10				X	X
14	57521	2/22/10	2/23/10	2/28/10				X	X
15	57524	2/22/10	3/1/10	3/31/10				X	X
16	57531	2/22/10	3/1/10	3/31/10				X	X
17	57577	2/22/10	3/1/10	3/31/10				X	X
18	57578	2/22/10	3/1/10	3/31/10				X	X
19	57670	3/2/10	3/2/10	3/2/10				X	X
20	57782	3/2/10	3/2/10	3/31/10				X	X
21	57783	3/2/10	3/2/10	3/31/10				X	X
22	57810	3/9/10	3/10/10	3/31/10				X	X
23	57819	3/9/10	3/10/10	3/31/10				X	X
24	14229	3/11/10	6/1/10	6/30/10				X	X
25	14231	3/11/10	6/1/10	6/30/10				X	X
26	14232	3/11/10	9/1/10	9/30/10				X	X
27	14234	3/11/10	3/1/10	3/31/10				X	X
28	14238	3/11/10	9/1/10	9/30/10				X	X
29	14249	3/13/10	6/1/10	6/30/10				X	X
30	58817	4/7/10	4/8/10	4/30/10				X	X
31	58818	4/7/10	4/8/10	4/30/10				X	X
32	14260	4/8/10	3/1/10	3/31/10				X	X
33	14262	4/8/10	9/1/10	8/31/10				X	X
34	14269	4/8/10	8/1/10	8/31/10				X	X
35	14274	4/8/10	7/1/10	7/31/10				X	X
36	14280	5/4/10	8/1/10	8/31/10				X	X
37	58247	5/4/10	5/5/10	3/31/10				X	X
38		5/4/10	5/5/10	3/31/10				X	X
39	14297	5/7/10	6/1/10	6/30/10				X	X
40	58735	6/7/10	4/1/10	10/31/10				X	X
41	58736		4/1/10	10/31/10				X	X
42	59061	6/18/10	7/1/10	9/30/10				X	X
43	59062	6/18/10	7/1/10	9/30/10				X	X
44	59161	6/25/10	7/1/10	7/31/10				X	X
45	59193	6/25/10	7/1/10	7/31/10				X	X
46	14403	10/1/10	1/1/11	1/31/11				X	X
47	14404	10/1/10	2/1/11	2/28/11				X	X
48	14405	10/1/10	4/1/11	4/31/11				X	X
49	60873	10/4/10	10/7/10	10/31/10				X	X
50	60874	10/4/10	10/7/10	10/31/10				X	X
51	14406	10/6/10	11/1/11	3/31/12				X	X
52	14407	10/6/10	1/1/11	1/31/11				X	X
53	14408	10/6/10	2/1/11	2/28/11				X	X
54	14409	10/7/10	11/1/11	3/31/12				X	X
55	14414	10/14/10	9/1/12	9/30/12				X	I
56	14416	10/14/10	9/1/12	9/30/12				X	X
57	14422	10/18/10	12/2/10	12/31/10				X	X
58	61046	10/29/10	11/1/10	11/30/10				X	X
59	61060	10/29/10	11/1/10	11/30/10				X	X
60	61067	10/29/10	11/1/10	10/31/11				X	X

Tickmark Explanations:

X - Attribute met, with.

1 - Per review of the Daily Trade Report, noted that the termination date per Nucleus did not agree to the termination date per the confirmation. Per discussion with Adam Dyak, the confirmation was originally incorrect, and as of the end of testing, a revised confirmation was obtained from the counterparty. Exception noted. In order to determine if this exception was an isolated incident, haphazardly selected an additional 60 deals to test below.

61	70554	10/27/10	11/1/10	3/31/11			CGT Mainline/.995+.005	20,000	X	X
62			11/1/10	3/31/11			CGT Mainline/.995+.005	20,000	X	X
63			11/1/10	3/31/11			CGT Mainline/.995+.005	20,000	X	X
64			11/1/10	3/31/11			CGT Mainline/.995+.005	20,000	X	X

ZMS 9/28/11

#	ID						
65	14234	2/24/10	11/1/10	11/30/			
66	14277	4/27/10	7/1/10	7/31/1		X	X
67	14305	5/26/10	2/1/11	2/28/1		X	X
68	14358	8/13/10	8/1/10	8/31/1		X	X
69	14409	10/7/10	11/1/11	3/31/1		X	X
70	14410	10/11/10	4/1/11	4/30/1		X	X
71	14411	10/11/10	7/1/11	7/31/1		X	X
72	14412	10/13/10	4/1/12	4/30/1		X	X
73	14413	10/13/10	7/1/11	7/31/1		X	X
74	14418	10/15/10	1/1/11	1/31/1		X	X
75	14419	10/15/10	12/1/11	12/31/1		X	X
76	14420	10/13/10	1/1/13	1/31/1		X	X
77	14421	10/15/10	2/1/12	2/28/1		X	X
78	14423	10/26/10	1/1/11	1/31/1		X	X
79	14424	10/26/10	4/1/11	4/30/1		X	X
80	14425	10/28/10	7/1/11	7/31/1		X	X
81	14426	10/26/10	10/1/11	10/31/1		X	X
82	14427	10/26/10	10/1/11	10/31/1		X	X
83	14428	10/26/10	4/1/12	4/30/1		X	X
84	14429	10/26/10	10/1/12	10/31/1		X	X
85	14430	10/26/10	10/1/12	10/31/1		X	X
86	14431	10/26/10	10/1/12	10/31/1		X	X
87	57123	1/21/10	1/22/10	1/31/10		X	X
88	57124	1/21/10	1/22/10	1/31/10		X	X
89	57183	1/28/10	2/1/10	2/28/10		X	X
90	57363	2/23/10	4/1/10	10/31/10		X	X
91	57568	2/23/10	3/1/10	3/31/10		X	X
92	57915	3/23/10	4/1/10	4/30/10		X	X
93	57916	3/24/10	7/1/10	9/30/10		X	X
94	57923	3/25/10	4/1/10	4/30/10		X	X
95	58133	4/22/10	4/23/10	4/30/10		2	X
96	58163	4/26/10	5/1/10	5/31/10		2	X
97	58535	5/20/10	6/1/10	6/30/10		X	X
98	58594	5/25/10	11/1/10	3/31/11		X	X
99	59514	7/19/10	7/20/10	7/31/10		X	X
100	59660	7/26/10	8/1/10	8/31/10		3	3
101	59879	8/4/10	8/5/10	8/31/10		2	X
102	60667	9/20/10	11/1/10	11/30/10		X	X
103	60837	9/24/10	10/1/10	10/31/10		2	X
104	60902	10/13/10	11/1/10	10/31/11		3	X
105	60903	10/13/10	11/1/10	10/31/11		X	X
106	60907	10/15/10	10/5/10	10/31/10		X	X
107	60958	10/25/10	11/1/10	11/30/10		3	3
108	60959	10/25/10	5/1/11	10/31/12		X	X
109	61032	10/27/10	11/1/10	11/30/10		X	X
110	61035	10/28/10	11/1/10	10/31/11		X	X
111	61036	10/27/10	11/1/10	11/30/10		X	X
112	61045	10/28/10	11/1/10	11/30/10		X	X
113	61051	10/28/10	11/1/10	11/30/10		X	X
114	61052	10/28/10	12/1/10	12/31/10		2	X
115	61058	10/27/10	11/1/10	11/30/10		2	X
116	61059	10/27/10	11/1/10	11/30/10		X	X
117	61055	10/28/10	1/1/11	3/31/11		2	X
118	14432	11/2/10	3/1/11	3/31/11		2	X
119	14436	11/3/10	6/1/11	6/30/11		X	X
120	14443	11/4/10	3/1/11	3/31/11		X	X

Tickmark Explanation:

2 - It was noted that the confirmation did not have tickmarks evidencing review. Per discussion with Adam Djok, Middle Office Analyst, these confirmations were generated from the Nucleus database (or was a long form generated outside of Nucleus for deal #60667). Therefore, the terms of the trade were reviewed by the Middle Office Analyst (see testing at A31-02). Explanation appeared reasonable; not an exception.

3 - It was noted that the confirmation did not agree to the Daily Trade Report or the trade blotter. Per discussion with Denise Toole, Administrative Corporate Ethics (SOX Coordinator), these transactions were not new deals, but were setup to accommodate a pipeline schedule change for deal #53757. Noted notation on the deal blotter that corroborated this explanation. Explanation appears reasonable; not an exception.

Work Performed:

Most Effort judgmentally selected 60 (15 in Q4) deals with delivery dates beyond the next business day from the Daily Trade Reports to test. Reviewed the confirmations for tickmarks evidencing the reconciliation between Nucleus and the actual confirmation. Agreed the terms of the confirmation (company, deal #, trade date, etc.) to the Daily Trade Report or the equivalent Nucleus screenprint. For one deal, noted that the termination date per Nucleus did not agree to the termination date per the confirmation. Per discussion with Adam Djok, Middle Office Analyst, the confirmation was originally incorrect, and as of the end of testing, a revised confirmation was obtained from the counterparty. Exception noted. In order to determine if this exception was an isolated incident, haphazardly selected an additional 60 deals to test. Reviewed the confirmations for tickmarks evidencing the reconciliation between Nucleus and the actual confirmation. Agreed the terms of the confirmation (company, deal #, trade date, etc.) to the Daily Trade Report or the equivalent Nucleus screenprint. No exceptions found. The exception was an isolated incident.

Results:

Audit Services considers the control to be operating effectively.

CONFIDENTIAL

Interim:
Prepared by: MEE 9/13/10
Reviewed by: MLC 9/24/10

Q4:
Prepared by: MEE 11/17/10
Reviewed by: LJO 12/3/10

Year-end:
Prepared by: N/A
Reviewed by: N/A

SOURCE: As Referenced
SOURCE: As Referenced