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May 13, 2015

**HAND DELIVERED**

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COMMISSION  
CLERK

Ms. Carlotta S. Stauffer  
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; FPSC Docket No. 150001-EI

Dear Ms. Stauffer:

Enclosed for filing in the above docket is the original and seven copies of Tampa Electric Company's Objections to Citizens' First Set of Interrogatories (Nos. 1-13), propounded and served by electronic mail on April 23, 2015.

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,

  
Ashley M. Daniels

AMD/pp  
Enclosure

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

COM	_____
AFD	<u>2</u>
APA	_____
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ENG	<u>1</u>
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TEL	_____
CLK	_____

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased )  
Power Cost Recovery Clause )  
and Generating Performance )  
Incentive Factor. )  
\_\_\_\_\_ )

DOCKET NO. 150001-EI

FILED: May 13, 2015

**TAMPA ELECTRIC COMPANY'S OBJECTIONS TO  
CITIZENS' FIRST SET OF INTERROGATORIES (NOS. 1-13)**

Tampa Electric Company ("Tampa Electric" or "the company") makes the following objections to certain of Citizens' First Set of Interrogatories (Nos. 1-13) propounded to Tampa Electric Company by Office of Public Counsel ("OPC"), dated April 23, 2015:

1. Tampa Electric objects to two subsections to OPC's Interrogatory No.7 which reads as follows:
  7. For each of the last two generating projects that the Company completed and placed into service (e.g., a generating project means a combined cycle natural gas plant or unit; a combustion turbine; an upgrade, repowering, modernization, or conversion at an existing unit, plant, or facility; a renewable energy project or solar facility; or any other generating unit, plant, or facility that produces electricity):
    - a. Please identify the two generating projects and when they were placed into service.
    - b. Please identify both the name plate capacity and the net plant capacity in megawatts for the generating project placed into service.
    - c. Please describe the total cost of each generating project placed into service (i.e., the total cost of the generating project booked to plant in service).
    - d. Please provide the per megawatt installed cost of each generating project using the total cost booked to plant in service.
    - e. Please provide the revenue requirement for the generating project placed into service.
    - f. Please explain whether the revenue requirement is recovered through base rates or a cost recovery clause.

**Basis for objection:** Tampa Electric objects to subsections (e) and (f) of OPC's Interrogatory No. 7 on the ground that the information requested is not relevant to the subject matter of this proceeding nor would the information likely lead to the discovery of admissible evidence. Furthermore, Tampa Electric objects to OPC's Interrogatory No.7 on the grounds that it calls for Tampa Electric to prepare information in a particular format and/or perform calculations and analyses not previously prepared or performed as purporting to expand Tampa Electric's obligations under applicable law. Subsections (e) and (f) of OPC's Interrogatory No.7 request information that in the past has been reserved for discussion in Tampa Electric's rate cases. Such information exceeds the scope of this docket. Additionally, subsections (e) and (f) as phrased requests Tampa Electric to prepare information and perform analyses about generating projects that it has not previously performed or conducted. Such a request goes beyond the scope of a permissible request.

2. Tampa Electric objects to OPC's Interrogatory No. 8 which reads as follows:
  8. Please provide the following information for the next planned generating unit pursuant to Company's current ten-year site plan:
    - a. The estimated nameplate capacity of the next planned generating unit.
    - b. The estimated net capacity (electricity delivered to the grid) of the next planned generating unit.
    - c. The estimated total cost of the next planned generating unit to be placed into service (i.e., the estimated total cost that would be booked to plant in service).
    - d. The estimated per megawatt installed cost of the next planned generating unit using the estimated total cost that would be booked to plant in service.
    - e. Assuming this next planned generating unit is placed into service, what would be the estimated revenue requirement and would the Company seek to recover the revenue requirement through base rates or a cost recovery clause?

**Basis for Objection:** Tampa Electric objects to OPC's Interrogatory No. 8 on the ground that the information requested could only be based on speculation. The interrogatory is

predicated on the EPA's Clean Power Plan Rule (or similar plan or rule designed to reduce greenhouse gas emissions), none of which has been finalized. To prepare generic answers based on assumptions relating to an uncertain rule would be purely speculative and would result in excessive and non-productive work for Tampa Electric's employees. Subject to the foregoing objection, the company will answer this interrogatory by providing information for the next planned generating unit pursuant to the company's ten-year site plan.

3. Tampa Electric objects to OPC's Interrogatory No. 9 which reads as follows:

9. Please provide the following information for a generic combined cycle natural gas unit:
  - a. The estimated nameplate capacity of the unit.
  - b. The estimated net capacity (electricity delivered to the grid) of the unit.
  - c. The estimated total cost of the unit to be placed into service (i.e., the estimated total cost that would be booked to plant in service.
  - d. The estimated per megawatt installed cost of the unit using the estimated total cost that would be booked to plant in service.
  - e. Assuming this generic combined cycle natural gas unit is placed into service, what would be the estimated revenue requirement and would the Company seek to recover the revenue requirement through base rates or a cost recovery clause?

**Basis for Objection:** Tampa Electric objects to OPC's Interrogatory No. 9 on the grounds that it calls for information that is not relevant to the subject matter of this proceeding nor would the information be likely to lead to the discovery of admissible evidence and is overbroad. This docket addresses issues relating to fuel and purchased power cost recovery, the generating performance incentive factors, capacity cost recovery factors and hedging to mitigate the volatility of fuel and purchased power prices. OPC's Interrogatory No. 9 has nothing to do with any of these issues. Instead, it poses unanswerable questions regarding a hypothetical "generic" combined cycle natural gas unit of unknown size, type, location, in service date, load to be served or any of the many other key variables that would have to be known in order to

answer the questions posed, even if they were relevant, which they are not. As framed, this question exceeds the scope of the docket. Tampa Electric also objects on the ground that the information requested could only be based on speculation. The interrogatory is predicated on the EPA's Clean Power Plan Rule (or similar plan or rule designed to reduce greenhouse gas emissions), none of which has been finalized. To prepare generic answers based on assumptions relating to an uncertain rule would be purely speculative and would result in excessive and non-productive work for Tampa Electric's employees.

4. Tampa Electric objects to OPC's Interrogatory No. 10 which reads as follows:

10. Please provide the following information for a natural gas combustion turbine ("CT"):
  - a. The estimated nameplate capacity of the CT.
  - b. The estimated net capacity (electricity delivered to the grid) of the CT.
  - c. The estimated total cost of the CT to be placed into service (i.e., the estimated total cost that would be booked to plant in service).
  - d. The estimated per megawatt installed cost of the CT using the estimated total cost that would be booked to plant in service.
  - e. Assuming this CT is placed into service, what would be the estimated revenue requirement and would the Company seek to recover the revenue requirement through base rates or a cost recovery clause?

**Basis for Objection:** Tampa Electric objects to OPC's Interrogatory No. 10 on the grounds that it calls for information that is not relevant to the subject matter of this proceeding nor would the information be likely to lead to the discovery of admissible evidence and is overbroad. This docket addresses issues relating to fuel and purchased power cost recovery, the generating performance incentive factors, capacity cost recovery factors and hedging to mitigate the volatility of fuel and purchased power prices. OPC's Interrogatory No. 10 has nothing to do with any of these issues. Instead, it poses unanswerable questions regarding a hypothetical natural gas combustion turbine ("CT") of unknown size, type, location, in service date, load to be

served or any of the many other key variables that would have to be known in order to answer the questions posed, even if they were relevant, which they are not. As framed, this question exceeds the scope of the docket. Tampa Electric also objects on the ground that the interrogatory is predicated on the EPA's Clean Power Plan Rule (or similar plan or rule designed to reduce greenhouse gas emissions), none of which has been finalized. To prepare generic answers based on assumptions relating to an uncertain rule would be purely speculative and would result in excessive and non-productive work for Tampa Electric's employees.

5. Tampa Electric objects to OPC's Interrogatory No. 11 which reads as follows:

11. Please provide the following information for a utility scale solar photovoltaic ("PV") facility greater than 20 megawatts:
  - a. The estimated nameplate capacity of the solar PV facility.
  - b. The estimated net capacity (electricity delivered to the grid) of the solar PV facility.
  - c. The estimated total cost of the solar PV facility to be placed into service (i.e., the estimated total cost that would be booked to plant in service).
  - d. The estimated per megawatt installed cost of the solar PV facility using the estimated total cost that would be booked to plant in service.
  - e. Assuming this solar PV facility is placed into service, what would be the estimated revenue requirement and would the Company seek to recover the revenue requirement through base rates or a cost recovery clause?

**Basis for Objection:** Tampa Electric objects to OPC's Interrogatory No. 11 on the grounds that it calls for information that is not relevant to the subject matter of this proceeding nor would the information be likely to lead to the discovery of admissible evidence and is overbroad. This docket addresses issues relating to fuel and purchased power cost recovery, the generating performance incentive factors, capacity cost recovery factors and hedging to mitigate the volatility of fuel and purchased power prices. OPC's Interrogatory No. 11 has nothing to do with any of these issues. Instead, it poses unanswerable questions regarding a hypothetical

utility scale solar photovoltaic ("PV") facility of unknown size, type, location, in service date, load to be served or any of the many other key variables that would have to be known in order to answer the questions posed, even if they were relevant, which they are not. As framed, this question exceeds the scope of the docket. Tampa Electric also objects on the ground that the interrogatory is predicated on the EPA's Clean Power Plan Rule (or similar plan or rule designed to reduce greenhouse gas emissions), none of which has been finalized. To prepare generic answers based on assumptions relating to an uncertain rule would be purely speculative and would result in excessive and non-productive work for Tampa Electric's employees.

6. Tampa Electric objects to OPC's Interrogatory No. 12 which reads as follows:
  12. Please provide the following information for a renewable energy facility or generating project ("renewable project"):
    - a. The estimated nameplate capacity of the renewable project.
    - b. The estimated net capacity (electricity delivered to the grid) of the renewable project.
    - c. The estimated total cost of the renewable project to be placed into service (i.e., the estimated total cost that would be booked to plant in service).
    - d. The estimated per megawatt installed cost of the renewable project using the estimated total cost that would be booked to plant in service.
    - e. Assuming this renewable project is placed into service, what would be the estimated revenue requirement and would the Company seek to recover the revenue requirement through base rates or a cost recovery clause?

**Basis for Objection:** Tampa Electric objects to OPC's Interrogatory No. 12 on the grounds that it calls for information that is not relevant to the subject matter of this proceeding nor would the information be likely to lead to the discovery of admissible evidence and is overbroad. This docket addresses issues relating to fuel and purchased power cost recovery, the generating performance incentive factors, capacity cost recovery factors and hedging to mitigate the volatility of fuel and purchased power prices. OPC's Interrogatory No. 12 has nothing to do

with any of these issues. Instead, it poses unanswerable questions regarding a hypothetical renewable energy facility or generating project ("renewable project") of unknown size, type, location, in service date, load to be served or any of the many other key variables that would have to be known in order to answer the questions posed, even if they were relevant, which they are not. As framed, this question exceeds the scope of the docket. Tampa Electric also objects on the ground that the interrogatory is predicated on the EPA's Clean Power Plan Rule (or similar plan or rule designed to reduce greenhouse gas emissions), none of which has been finalized. To prepare generic answers based on assumptions relating to an uncertain rule would be purely speculative and would result in excessive and non-productive work for Tampa Electric's employees.

7. Tampa Electric objects to OPC's Interrogatory No. 13 which reads as follows:

13. Please provide the following information for a nuclear unit:
  - a. The estimated nameplate capacity of the nuclear unit.
  - b. The estimated net capacity (electricity delivered to the grid) of the nuclear unit.
  - c. The estimated total cost of the nuclear unit to be placed into service (i.e., the estimated total cost that would be booked to plant in service).
  - d. The estimated per megawatt installed cost of the nuclear unit using the estimated total cost that would be booked to plant in service.
  - e. Assuming this nuclear unit is placed into service, what would be the estimated revenue requirement and would the Company seek to recover the revenue requirement through base rates or a cost recovery clause?

**Basis for Objection:** Tampa Electric objects to OPC's Interrogatory No. 13 on the grounds that it calls for information that is not relevant to the subject matter of this proceeding nor would the information be likely to lead to the discovery of admissible evidence and is overbroad. This docket addresses issues relating to fuel and purchased power cost recovery, the generating performance incentive factors, capacity cost recovery factors and hedging to mitigate



the volatility of fuel and purchased power prices. OPC's Interrogatory No. 13 has nothing to do with any of these issues. Instead, it poses unanswerable questions regarding a hypothetical nuclear unit of unknown size, type, location, in service date, load to be served or any of the many other key variables that would have to be known in order to answer the questions posed, even if they were relevant, which they are not. As framed, this question exceeds the scope of the docket. Tampa Electric also objects on the ground that the interrogatory is predicated on the EPA's Clean Power Plan Rule (or similar plan or rule designed to reduce greenhouse gas emissions), none of which has been finalized. To prepare generic answers based on assumptions relating to an uncertain rule would be purely speculative and would result in excessive and non-productive work for Tampa Electric's employees.

WHEREFORE, Tampa Electric submits the foregoing specific objections to Citizens' First Set of Interrogatories Nos. 7-13.

DATED this 13<sup>th</sup> day of May 2015.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Objections has been furnished by hand delivery (\*) or electronic mail on this on this 13<sup>th</sup> day of May 2015 to the following:

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