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July 13, 2015

## **VIA: ELECTRONIC FILING**

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:

Attached for filing in the above docket is Tampa Electric Company's Objections to Citizens' Second Set of Interrogatories (Nos. 14-36), propounded and served by electronic mail on June 23, 2015.

Thank you for your assistance in connection with this matter.

Sincerely,

James D. Beasley

JDB/pp Attachment

cc: All parties of record (w/attachment)

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased	)	
Power Cost Recovery Clause	)	DOCKET NO. 150001-EI
and Generating Performance	)	
Incentive Factor.	)	FILED: July 13, 2015
	)	

# TAMPA ELECTRIC COMPANY'S OBJECTIONS TO CITIZENS' SECOND SET OF INTERROGATORIES TO TAMPA ELECTRIC COMPANY (NOS. 14-36)

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.340(a), Florida Rules of Civil Procedure, files this its objections to two of the interrogatories contained in Citizens' Second Set of Interrogatories to Tampa Electric (Nos. 14-36) filed by Office of Public Counsel ("OPC") and, says:

- 1. Tampa Electric objects to OPC's Interrogatory No.14 which reads as follows:
  - 14. Please refer to the Company's response to OPC's interrogatory about the gains or losses incurred in hedging natural gas for the years 2002 to 2014, please breakdown, by year, the hedging gains or losses on a total and customer class basis.

Basis for objection: Tampa Electric does not maintain the information in the form requested by OPC and it is not reasonably possible for the company to accurately break down one or 14 years of historical fuel costs by customer class. Any effort to do so would be unduly burdensome. Furthermore, the company does not believe that the calculation would be meaningful or relevant. Subject to the foregoing objection, and without endorsing any calculation that OPC may make, the company will answer this interrogatory by providing the impact which a recent change in fuel costs had on the company's retail fuel factor on a \$/MWh basis, along with the percentages of total energy usage attributable to Residential, Commercial,

Industrial and Governmental energy usage. Tampa Electric only maintains information regarding hedging gains and losses on a total annual basis and that information has already been provided to OPC in this proceeding.

- 2. Tampa Electric objects to OPC's Interrogatory No. 15 which reads as follows:
  - 15. Please refer to the Company's response to OPC's interrogatory about the gains or losses projected to be incurred for hedging natural gas for 2015, please breakdown the hedging losses on a total and customer class basis.

Basis for Objection: Tampa Electric does not maintain the information in the form requested by OPC and it is not reasonably possible for the company to accurately break down one or 14 years of historical fuel costs by customer class. Any effort to do so would be unduly burdensome. Furthermore, the company does not believe that the calculation would be meaningful or relevant. Subject to the foregoing objection, and without endorsing any calculation that OPC may make, the company will answer this interrogatory by providing the impact which a recent change in fuel costs had on the company's retail fuel factor on a \$/MWh basis, along with the percentages of total energy usage attributable to Residential, Commercial, Industrial and Governmental energy usage. Tampa Electric only maintains information regarding hedging gains and losses on a total annual basis and that information has already been provided to OPC in this proceeding.

WHEREFORE, Tampa Electric submits the foregoing objections to Interrogatories Nos. 14 and 15 of OPC's Second Set of Interrogatories (Nos. 14-36).

DATED this 13 Hay of July 2015.

Respectfully submitted,

AMES D. BEASLEY

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