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May 13, 2019

**VIA: ELECTRONIC FILING**

Mr. Adam J. Teitzman  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

Re: Review of 2019-2021 storm hardening plan, Tampa Electric Company; Docket  
No. 20180145-EI

Dear Mr. Teitzman:

Attached for filing in the above docket are Tampa Electric Company's responses to Staff's Fourth Data Request (Nos. 1-2) dated April 29, 2019.

Thank you for your assistance in connection with this matter.

Sincerely,

  
James D. Beasley

JDB/pp  
Attachment

**TAMPA ELECTRIC COMPANY  
DOCKET NO. 20180145-EI  
STAFF'S FOURTH DATA REQUEST  
REQUEST NO. 1  
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**Please refer to TECO's responses to staff's third data request.**

1. Please refer to request number 1. TECO responded that Rule 250C does not apply to wood poles less than 60 feet above ground. However, it appears that Rule 250C states that for construction grade B or C, all structures, including those below 18 meters (60 feet), shall be designed to withstand the extreme wind load in any direction on the structure. The Rule further states that for those structures below 60 feet, the conductors should not be considered. Please explain your interpretation of the Rules 261A1c, 261A2e, 261A3d, and 250C.
  - A. Rule 250C for Extreme Wind Loading exempts structures or supported facilities NOT exceeding 60 feet above ground or water level, except as specified in Rules 261A1c, 261A2e, 261A3d,

Rules 261A1c, 261A1e, and 261A1d are applicable to metal/concrete structures, wood structures, and fiber-reinforced polymer structures, without conductors, respectively. Tampa Electric's interpretation of these rules are as follows: the types of structures specified in these rules are exempt from Rule 250C when there are conductors installed on them. Tampa Electric's distribution structures are shorter than 60 feet above ground or water line and have conductors installed on them.

Tampa Electric's street light structures, for example, do not have conductors installed on them and therefore are designed to meet Rule 250C, 261A1c, 261A2e, 261A3d. The company's interpretation of these rules have been consistent with other utilities' interpretation who are members of the Southeastern Electric Exchange ("SEE").

**TAMPA ELECTRIC COMPANY  
DOCKET NO. 20180145-EI  
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REQUEST NO. 2  
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**2.** Please refer to request number 23. Does TECO have any suggested improvements/alternatives/modifications including the elimination, of any of the Ten Initiatives? If so, please explain.

**A.** At this time the company is identifying the alternative approaches that may be needed to satisfy the anticipated rulemaking by the Commission in response to the recently passed storm protection plan and vegetation management legislation (Storm Protection - SB 766/HB797 and Vegetation Management CS/HB 1159). The company's interpretation of the first bill (SB796/HB797) is that the legislature wanted a "Transmission and distribution storm protection plan" defined as "a plan for the overhead hardening and increased resilience of electric transmission and distribution facilities, undergrounding of electric service distribution facilities, and vegetation management." Depending on the outcome of the rule making, there may be opportunities for Tampa Electric to improve/modify/eliminate or propose alternatives to the Ten Initiatives. These potential modifications could be improvements such as eliminating unnecessary reporting, quickening hardening efforts by eliminating certain inspections and replacing them with systematic replacement programs, or the proposal of alternative approaches. At this point, the company believes it would be premature to change the responses that were provided on February 19, 2018 within Staff's Third Data Request, Request No. 9, within Docket No. 20170215 until the company understands the incremental impact to Tampa Electric of the rule-making necessitated by the recently passed legislation.