

**BEFORE THE**  
**FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for recovery of costs associated )  
with named tropical systems during the 2015, )  
2016, and 2017 hurricane seasons and )  
replenishment of storm reserve subject to )  
final true-up, Tampa Electric Company. )

DOCKET NO. 20170271-EI  
FILED: JULY 6, 2018

**TAMPA ELECTRIC COMPANY'S**  
**ANSWERS TO SECOND SET OF INTERROGATORIES (NOS. 8-16)**  
**OF**  
**FLORIDA PUBLIC SERVICE COMMISSION STAFF**

Tampa Electric files this its Answers to Interrogatories (Nos. 8-16) propounded and served on June 21, 2018 by the Florida Public Service Commission Staff.

TAMPA ELECTRIC COMPANY  
DOCKET NO. 20170271-EI  
INDEX TO STAFF'S SECOND SET OF INTERROGATORIES (NOS. 8-16)

<u>Number</u>	<u>Witness</u>	<u>Subject</u>	<u>Bates Stamped Page</u>
8	Chasse	Please refer to the direct testimony of witness Chasse. On page 4, lines 20 to 23, witness Chasse testified that facilities, equipment and critical customers are restored using both a predetermined prioritization process and a methodology to restore the largest number of customers as quickly as possible. a. Please describe TECO's predetermined prioritization process.	1
9	Chasse	Please describe TECO's methodology to restore the largest number of customers as quickly as possible. Please refer to the direct testimony of witness Chasse. On page 11, lines 11 to 15, witness Chasse testified that approximately five to seven days prior a storms impact on TECO's service area, the Electric Delivery Incident Commander will initiate full or partial Command Structure depending on the storm's intensity and forecasted track. On page 12, lines 2 to 4, witness Chasse further testified that if the forecasts for impact continue to hold, all other areas of the company are activated. How many days and/or hours before a storm impact are the other areas of the company activated?	2
10	Chasse	Please refer to the direct testimony of witness Chasse. On page 27, lines 11 to 15, witness Chasse testified the Incident Base was opened the day after restoration mode began. a. Is this time frame part of TECO's emergency plan and is this time frame typical for TECO? b. If not, why not?	3
11	Chasse	Please refer to the direct testimony of witness Chasse. On page 30, lines 1 to 15, witness Chasse provided testimony explaining why the cost in TECO's original petition were updated. a. Are the updated amounts included in exhibit GRC-1 included in any of TECO's responses to OPC's first set of interrogatories and OPC's first set of production of documents? i. If so, which ones? ii. If not, please provide updated responses with the correct amounts.	4

12	Chronister	<p>Please refer to the direct testimony of witness Young and witness Chronister. On page 5, lines 20 to 21, and page 6, lines 17 to 18, witness Young testified that foreign crews assisted with restoration efforts and part of the foreign resources were mutual assistance routing systems "MARS" (call center assistance). On page 13, lines 16 to 17, witness Chronister testified that the utility call center and customers service budgeted overtime were excluded from restoration costs per the ICCA methodology.</p> <p>a. Were the costs associated with MARS included in the restoration costs?</p> <p>b. If so, please explain why the costs were included.</p>	6
13	Young	<p>Please refer to the direct testimony of witness Young, page 8, lines 11 to 13, and page 13, lines 3 to 5. Witness Young testified that releasing foreign crew resources to other utilities as early as practical would minimize travel costs. Please explain how this minimizes travel costs.</p>	7
14	Young	<p>Please refer to the direct testimony of witness Young, page 21, lines 23 to 25, and page 22, lines 1 to 5. Witness Young testified to non-T&amp;D storm support activities costs; please identify how much of the costs, if any, listed were from MARS?</p>	8
15	Young	<p>Please refer to the direct testimony of witness Young, Exhibit SEY-1, Document No. 1, which lists the costs for foreign crews per storm.</p> <p>a. Are the costs in the Customer Service column the costs that were incurred for MARS?</p> <p>b. Please identify what costs are included in the Other column?</p>	9
16	Young	<p>Please refer to the direct testimony of witness Young, Exhibit SEY-1, Document No. 2, which lists the indirect recoverable costs per storm and function (distribution, transmission, generation).</p> <p>a. Please identify the indirect recoverable costs for each department listed below:</p> <ul style="list-style-type: none"> <li>• Business Development</li> <li>• Business Strategy and Renewables</li> <li>• Community Relations</li> <li>• Financial Accounting and Business Planning</li> <li>• Regulatory</li> <li>• Customer Experience</li> <li>• Energy Supply</li> <li>• Safety</li> <li>• TECO Services</li> </ul>	10

Gerard Chasse  
Vice President, Electric Delivery

Jeff Chronister  
Controller, Accounting

Beth Young  
Director, Asset Management & System Planning

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702 N. Franklin Street  
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INTERROGATORY NO. 8  
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8. Please refer to the direct testimony of witness Chasse. On page 4, lines 20 to 23, witness Chasse testified that facilities, equipment and critical customers are restored using both a predetermined prioritization process and a methodology to restore the largest number of customers as quickly as possible.
- a. Please describe TECO's predetermined prioritization process.

- A. a. Tampa Electric and Hillsborough County have developed a prioritized listing of community facilities, known as the Critical Facility Index ("CFI"). Each critical facility is assigned a priority score of one (1) to five (5), 1 being the highest priority and 5 being the lowest for restoration based on their criticality to the whole community and other factors such as: public health; safety; national or global economy and security; water treatment, supply and distribution; telecommunication; electric service; etc. The company and Hillsborough County collaborate each year during preparations for the upcoming hurricane season to update the CFI list.

Tampa Electric will take the updated CFI list and load it into the company's Geographical Information System ("GIS") with the associated features of each critical facility. In the event of an outage that impacts a critical facility, by having it programmed in GIS, the company's outage management system ("OMS") will provide a notification of circuit priority anytime there is an outage on that feeder/circuit.

For restoration, this listing identifies the facility types in each priority level and takes into consideration the global use of these resources and provided a predetermined prioritization process/order for the performance of restoration and recovery. This same methodology, including annually updating the CFI list, of prioritizing critical facilities is used in other counties served by the company.

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INTERROGATORY NO. 9  
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- 9.** Please describe TECO's methodology to restore the largest number of customers as quickly as possible. Please refer to the direct testimony of witness Chasse. On page 11, lines 11 to 15, witness Chasse testified that approximately five to seven days prior a storms impact on TECO's service area, the Electric Delivery Incident Commander will initiate full or partial Command Structure depending on the storm's intensity and forecasted track. On page 12, lines 2 to 4, witness Chasse further testified that if the forecasts for impact continue to hold, all other areas of the company are activated. How many days and/or hours before a storm impact are the other areas of the company activated?
- A.** Full or partial activation of the Incident Command System ("ICS") across Tampa Electric is dependent on the forecasted impact and the amount of foreign resources that will be brought in to support the restoration effort. For Hurricane Irma, the company fully activated ICS on Wednesday, September 6, 2017 (five days prior to the storm).

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INTERROGATORY NO. 10  
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**10.** Please refer to the direct testimony of witness Chasse. On page 27, lines 11 to 15, witness Chasse testified the Incident Base was opened the day after restoration mode began.

- a. Is this time frame part of TECO's emergency plan and is this time frame typical for TECO?
- b. If not, why not?

**A.** a. Due to the varying tracks and timing of the forecast models and their relative impacts to Tampa Electric's service area, the company made the decision on Tuesday, September 5, 2017 to plan for the scenario of a Category 3 hurricane traveling up the west coast of Florida. Tampa Electric initiated planning discussion on which incident base(s) to open beginning on Wednesday, September 6, 2017. The company made plans to open all incident bases on Tuesday, September 12, 2017 with the Strawberry Festival Fairgrounds designated as the Gateway site for all foreign resources to report to first for entry processing and assignment.

Due to safety concerns, foreign resources are expected to arrive on site after the storm passes. With the path of the storm traveling north through the state, some resources were forced to wait until Tuesday, September 12, 2017 to arrive. Also, due to the number of resources requested and the distance they had to travel to arrive, it was determined Incident Bases did not all require to be opened at the same time. Staggering the opening of the Incident Bases facilitated the logistical effort required to open sites.

- b. The need for Incident Bases is included as part of Tampa Electric's Electric Delivery Command call agenda from the time of the first call. Which Incident Bases to open and their timing is dependent upon the track, timing and expected impacts of each storm. As such, there is no set time frame for opening Incident Bases.

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INTERROGATORIES  
INTERROGATORY NO. 11  
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- 11.** Please refer to the direct testimony of witness Chasse. On page 30, lines 1 to 15, witness Chasse provided testimony explaining why the cost in TECO's original petition were updated.
- a. Are the updated amounts included in exhibit GRC-1 included in any of TECO's responses to OPC's first set of interrogatories and OPC's first set of production of documents?
- i. If so, which ones?
- ii. If not, please provide updated responses with the correct amounts.
- A.**
- a. Tampa Electric updated the amounts and included these changes in Exhibit GRC-1, Document No. 1 which was filed on May 21, 2018.
- i. Tampa Electric updated recoverable costs on Response Nos. 33, 34, 35, 38, and 39 to OPC's first set of interrogatories.
- ii. Tampa Electric filed updated responses for Response Nos. 1-33 for a supplemental response summarizing costs for contractors not included in the company's initial response. This supplemental response was filed in Response No. 56 of OPC's third set of Interrogatories that was filed on June 18, 2018. In addition, the outstanding foreign crew resource invoices that were received after April 9, 2018 were filed on June 19, 2018 in the company's Supplemental Response No. 6 to OPC's first Set of Production of Documents. The updated responses to OPC's first set of interrogatories Response Nos. 34, 35, 38 and 39 are provided below.

Response No. 34 – changes for Hurricane Irma are reflected below. All other storms had no changes.

<b>Materials and Supplies Expense - Hurricane Irma</b>					
	2015	2016	2017	2018	<b>Total</b>
Distribution	0	0	1,930,478	(1,281,244)	<b>649,234</b>
Transmission	0	0	0	0	<b>0</b>
Generation	0	0	165,298	0	<b>165,298</b>
Other	0	0	49	0	<b>49</b>
<b>Total</b>	<b>0</b>	<b>0</b>	<b>2,095,825</b>	<b>(1,281,244)</b>	<b>814,581</b>



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INTERROGATORY NO. 11  
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Response No. 35 – changes for Hurricane Irma are reflected below. All other storms had no changes.

<b>Materials and Supplies Issue - Hurricane Irma</b>					
	2015	2016	2017	2018	Total
Distribution	0	0	1,091,213	0	<b>1,091,213</b>
Transmission	0	0	391	0	<b>391</b>
Generation	0	0	2,449	0	<b>2,449</b>
Other	0	0	0	0	<b>0</b>
<b>Total</b>	<b>0</b>	<b>0</b>	<b>1,094,053</b>	<b>0</b>	<b>1,094,053</b>

Response No. 38 – changes for Hurricane Irma are reflected below. All other storms had no changes.

<b>Other Operating Expenses - Hurricane Irma</b>					
	2015	2016	2017	2018	Total
Distribution	0	0	68,515	35	<b>68,550</b>
Transmission	0	0	0	0	<b>0</b>
Generation	0	0	3,745	0	<b>3,745</b>
Other	0	0	0	0	<b>0</b>
<b>Total</b>	<b>0</b>	<b>0</b>	<b>72,260</b>	<b>35</b>	<b>72,295</b>

Response No. 39 – changes for Hurricane Irma are reflected below. All other storms had no changes.

<b>Employee Expenses - Hurricane Irma</b>					
	2015	2016	2017	2018	Total
Distribution	0	0	4,448,382	1,535	<b>4,449,917</b>
Transmission	0	0	471	0	<b>471</b>
Generation	0	0	484	0	<b>484</b>
Other	0	0	79,180	0	<b>79,180</b>
<b>Total</b>	<b>0</b>	<b>0</b>	<b>4,528,517</b>	<b>1,535</b>	<b>4,530,052</b>

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INTERROGATORY NO. 12  
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- 12.** Please refer to the direct testimony of witness Young and witness Chronister. On page 5, lines 20 to 21, and page 6, lines 17 to 18, witness Young testified that foreign crews assisted with restoration efforts and part of the foreign resources were mutual assistance routing systems "MARS" (call center assistance). On page 13, lines 16 to 17, witness Chronister testified that the utility call center and customers service budgeted overtime were excluded from restoration costs per the ICCA methodology.
- a. Were the costs associated with MARS included in the restoration costs?
  - b. If so, please explain why the costs were included.
- A.**
- a. Yes, the cost for Mutual Assisting Routing Systems ("MARS")(call center assistance) was included in the restoration costs.
  - b. Tampa Electric used the same logic as any other foreign crew mutual assistance costs that are prudent, reasonable and recoverable under the Incremental Cost and Capitalization Approach methodology. The costs to acquire MARS call center assistance during Hurricane Irma was all incremental and is not included in base rates nor is it budgeted as straight time or overtime in the company's Customer Experience Department.

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INTERROGATORY NO. 13  
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- 13.** Please refer to the direct testimony of witness Young, page 8, lines 11 to 13, and page 13, lines 3 to 5. Witness Young testified that releasing foreign crew resources to other utilities as early as practical would minimize travel costs. Please explain how this minimizes travel costs.
  - A.** Releasing foreign crew resources to other utilities as early as practical minimizes the amount of travel costs that can be charged to Tampa Electric. If Tampa Electric releases foreign resources to another impacted utility, the company does not have to pay any of the foreign resources' travel costs to return to their home. The impacted utility that picks them up will pay their returning travel costs.

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INTERROGATORY NO. 14  
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- 14.** Please refer to the direct testimony of witness Young, page 21, lines 23 to 25, and page 22, lines 1 to 5. Witness Young testified to non-T&D storm support activities costs; please identify how much of the costs, if any, listed were from MARS?
  - A.** Tampa Electric incurred \$734,543 in non-T&D storm support activities costs from MARS.

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INTERROGATORY NO. 15  
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- 15.** Please refer to the direct testimony of witness Young, Exhibit SEY-1, Document No. 1, which lists the costs for foreign crews per storm.
- a. Are the costs in the Customer Service column the costs that were incurred for MARS?
  - b. Please identify what costs are included in the Other column?
- A.**
- a. Yes, the costs in the Customer Service column are the costs associated with MARS.
  - b. "Other" column costs on witness Young's Exhibit SEY-1, Document No. 1 include costs for security, fuel services and buses for transporting crews.

**TAMPA ELECTRIC COMPANY  
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INTERROGATORY NO. 16  
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**16.** Please refer to the direct testimony of witness Young, Exhibit SEY-1, Document No. 2, which lists the indirect recoverable costs per storm and function (distribution, transmission, generation).

a. Please identify the indirect recoverable costs for each department listed below:

- Business Development
- Business Strategy and Renewables
- Community Relations
- Financial Accounting and Business Planning
- Regulatory
- Customer Experience
- Energy Supply
- Safety
- TECO Services

**A.** a. The indirect recoverable costs that Tampa Electric incurred for assisting the company in its restoration efforts for the departments listed above are provided in the tables below for each storm:

Tropical Storm Erika	
Indirect Department	Recoverable Costs
Business Development	\$0
Business Strategy and Renewables	\$0
Community Relations	\$0
Financial Accounting and Business Planning	\$0
Regulatory	\$0
Customer Experience	\$0
Energy Supply	\$0
Safety	\$0
TECO Services	\$3,538

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Tropical Storm Colin	
Indirect Department	Recoverable Costs
Business Development	\$0
Business Strategy and Renewables	\$0
Community Relations	\$0
Financial Accounting and Business Planning	\$0
Regulatory	\$0
Customer Experience	\$0
Energy Supply	\$0
Safety	\$0
TECO Services	\$8,301

Hurricane Hermine	
Indirect Department	Recoverable Costs
Business Development	\$0
Business Strategy and Renewables	\$0
Community Relations	\$0
Financial Accounting and Business Planning	\$0
Regulatory	\$0
Customer Experience	\$0
Energy Supply	\$0
Safety	\$0
TECO Services	\$4,077

Hurricane Matthew	
Indirect Department	Recoverable Costs
Business Development	\$0
Business Strategy and Renewables	\$0
Community Relations	\$0
Financial Accounting and Business Planning	\$0
Regulatory	\$0
Customer Experience	\$0
Energy Supply	\$0
Safety	\$0
TECO Services	\$9,831

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Hurricane Irma	
Indirect Department	Recoverable Costs
Business Development	\$0
Business Strategy and Renewables	\$986
Community Relations	\$891
Financial Accounting and Business Planning	\$18,207
Regulatory	\$28,067
Customer Experience	\$410,639
Energy Supply	\$95,260
Safety	\$3,030
TECO Services	\$239,064




A F F I D A V I T

STATE OF FLORIDA            )  
  )  
COUNTY OF HILLSBOROUGH )

Before me the undersigned authority personally appeared, who deposed and said that he is a Manager, Rates, Tampa Electric Company, and that the individuals listed in Tampa Electric Company's response to Staff's Second Set of Interrogatories, (Nos. 8-16) prepared or assisted with the responses to these interrogatories to the best of his information and belief.

Dated at Tampa, Florida this 5 day of July, 2018.

  
\_\_\_\_\_  
*MARK R. Roche*

Sworn to and subscribed before me this 5<sup>th</sup> day of July, 2018.

  
\_\_\_\_\_



My Commission expires \_\_\_\_\_