

STATE OF FLORIDA



COMMISSIONERS:  
GARY F. CLARK, CHAIRMAN  
ART GRAHAM  
JULIE I. BROWN  
DONALD J. POLMANN  
ANDREW GILES FAY

DIVISION OF ENGINEERING  
TOM BALLINGER  
DIRECTOR  
(850) 413-6910

# Public Service Commission

September 14, 2020

J. Jeffry Wahlen  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, Florida 32302  
[jbeasley@ausley.com](mailto:jbeasley@ausley.com)

**STAFF'S SECOND DATA REQUEST**  
*via e-mail*

**Re: Docket No. 20200064-EI, Petition for a limited proceeding to approve fourth SoBRA, by Tampa Electric Company.**

Dear Mr. Wahlen:

By this letter, the Commission staff requests that Tampa Electric Company (TECO or Utility) provide responses to the following data request.

1. Please refer to the direct testimony of TECO witness Jose A. Aponte, page 13, lines 11 through 14. Please explain how TECO plans to recover the remaining 14.4 MW of capacity from the Durrance project.
2. Please refer to the direct testimony of TECO witness Jose A. Aponte, page 19, lines 1 through 6, and Exhibit JAA-1, Document No. 4. Please explain, if the deferral was based on 2016 planning assumptions, why the type of avoided unit was changed from a combustion turbine to a reciprocating engine.
  - a. Please provide the impact to the cost-effectiveness test of using a combustion turbine instead of the reciprocating engine, and if the project would still be cost-effective with this modified analysis. As part of this response, provide the results in the same format as Exhibit JAA-1, Document No. 4.
3. Please refer to the direct testimony of TECO witness Jose A. Aponte, Exhibit JAA-1, Document No. 3. Please provide a more detailed breakdown of "Exhibit (JAA-1), Document No. 3" (i.e., including capital, which is provided in petition, the weighted average cost of capital, depreciation, and any other O&M, e.g., property taxes, and the Net Operating Income multiplier/revenue expansion factor used) in electronic/spreadsheet format (MS Excel, cells unlocked and formulas intact) for the Forth Solar Base Rate Adjustment.

4. Please refer to the direct testimony of TECO witness Jose A. Aponte, Exhibit JAA-1, Document Nos. 4 and 5. Please provide the reserve margin in megawatts and percentage of net firm system peak for the years 2020 to 2050 (30-year period) in an Excel table comparing the reserve margin with the Fourth SoBRA included and with the Fourth SoBRA excluded.
5. Please refer to the direct testimony of TECO witness Jose A Aponte, Exhibit JAA-1, Document Nos. 4 and 5. Please provide a table comparing TECO's resource plan with the Fourth SoBRA included and with the Fourth SoBRA excluded.
6. Please refer to the direct testimony of TECO witness Jose A Aponte, Exhibit JAA-1 Document No. 2. Has TECO compared the fuel price forecast shown on Document No. 2 to any other publically available source of forecasted fuel prices, such as the Energy Information Administration? If so, please discuss the results of any analysis performed. If not, why?
7. Please refer to the direct testimony of TECO witness Jose A Aponte, Exhibit JAA-1, Document No. 5. Please provide the avoided fossil fuels (avoided oil barrels, avoided natural gas MMcf, avoided coal short tons) from the years 2021 to 2050. Please explain how calculations were made for each fuel and provide an example using 2022. Provide the response in tabular electronic format in Excel.
8. Please refer to the direct testimony of TECO witness Jose A Aponte, Exhibit JAA-1, Document No. 5. Please provide the avoided air emissions (CO<sub>2</sub>, SO<sub>2</sub>, NO<sub>x</sub>) for the 30-year period. Show how each was calculated using the year 2022 as an example. Also, provide the response in tabular electronic format in Excel.
9. Please refer to the direct testimony of TECO witness William R. Ashburn, Exhibit WRA-1, Document No. 4. Please provide the estimated monthly bill impact of the Fourth SoBRA for an average residential customer (1,000 kWh/mo) for each year of the project's life. As part of this response, provide a breakdown of the total bill impact, base rate increase associated with the SoBRA, system base rate savings, and system fuel savings. Please provide all calculations in Excel format, with formulas intact.
10. Please refer to the direct testimony of TECO witness Mark D. Ward, Exhibit MDW-1 to answer the following questions about the Durrance site.
  - a. How many total acres are in the Durrance site?
  - b. How many acres in the Durrance site are planned for this solar installation?
  - c. How many acres in the Durrance site would be suitable for future development as a solar installation, or other utility purposes including battery storage?
  - d. How many acres in the Durrance site are not suitable for future development as solar installation, or any other utility purpose?
  - e. Please describe why any area of the Durrance site is not suitable for future development.
  - f. Please describe the work required to develop the Durrance site.

J. Jeffry Wahlen  
Page 3  
September 14, 2020

Please file all responses electronically no later than **September 28, 2020**, via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form (reference Docket No. 20200064-EI). If you have any questions, please contact, Donald Phillips by phone (850) 413-6974 or email at [Dphillips@psc.state.fl.us](mailto:Dphillips@psc.state.fl.us), or Phillip Ellis by phone (850) 413-6626 or email at [PEllis@psc.state.fl.us](mailto:PEllis@psc.state.fl.us)

Sincerely,

*/s/Donald Phillips*

Donald Phillips  
Engineering Specialist

DP/jp

cc: Office of Commission Clerk (Docket No. 20200064-EI)  
Paula Brown – Regulatory Affairs ([regdept@tecoenergy.com](mailto:regdept@tecoenergy.com))  
J.R. Kelly, Office of Public Counsel ([kelly.jr@leg.state.fl.us](mailto:kelly.jr@leg.state.fl.us))