

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost)
Recovery Clause.)
_____)

DOCKET NO. 20220010-EI
FILED: October 7, 2022

**PREHEARING STATEMENT
OF TAMPA ELECTRIC COMPANY**

A. APPEARANCES:

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Post Office Box 391
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On behalf of Tampa Electric Company

B. WITNESSES:

Witness	Subject Matter	Issues #
Direct		
Mark R. Roche	Storm Protection Plan Cost Recovery True-Up and Projection	1-10
David L. Plusquellic	Storm Protection Plan Cost Recovery True-Up and Projection	1-10
Rebuttal		
A. Sloan Lewis	Storm Protection Plan Cost Recovery True-Up and Projection	1-10
David L. Plusquellic	Storm Protection Plan Cost Recovery True-Up and Projection	1-10

C. EXHIBITS:

Witness	Proffered By	Exhibit No.	Description	Issues#
Direct				
Mark R. Roche	Tampa Electric Company	MRR-1; Schedule A-1, filed April 1, 2022	Schedules supporting cost recovery amount, actual January 2021–December 2021	1-10
Mark R. Roche	Tampa Electric Company	MRR-2; Schedule E-1 and E-2, filed May 2, 2022	Schedules supporting cost recovery amount, projected January 2022- December 2022	1-10
Mark R. Roche	Tampa Electric Company	MRR-2; Schedule P-1, filed May 2, 2022	Schedules supporting costs recovery amount, projected for the period January 2023–December 2023	1-10
David L. Plusquellic	Tampa Electric Company	DLP-1 filed April 1, 2022	Storm Protection Plan Accomplishments	1-10
David L. Plusquellic	Tampa Electric Company	DLP-2 filed May 2, 2022	Project List and Summary of Costs	1-10
Rebuttal				
David L. Plusquellic	Tampa Electric Company	DLP-3 filed September 27, 2022	Images of Transmission Access Enhancement Projects	1-10

D. STATEMENT OF BASIC POSITION

Tampa Electric’s Statement of Basic Position:

The Commission should determine that Tampa Electric has properly calculated its Storm Protection Plan cost recovery true-up and projections and the Storm Protection Plan cost recovery factors set forth in the testimony and exhibits of witness Mark R. Roche during the period January 2023 through December 2023. The Commission should find that Tampa Electric’s actual 2021 Storm Protection Plan costs were prudently incurred.

The Commission is currently scheduled to conduct a hearing regarding the Storm Protection Cost Recovery Clause on November 1, 2022, to review and approve the proposed cost recovery factors to be used for the January 2023 through December 2023 period. On October 4, 2022, the Commission voted to approve the company’s 2022-2031 Storm Protection Plan in Docket No. 20220048-EI with one modification – elimination of the company’s existing Transmission Access Enhancement Program in as of December 31, 2022. The company is currently in the process of amending the Storm Protection Plan cost recovery clause projection to account for this modification and will provide an updated prehearing statement and supplemental testimony with updated costs and proposed cost recovery factors as soon as possible.

E. STATEMENT OF ISSUES AND POSITIONS

GENERIC STORM PROTECTION PLAN COST RECOVERY ISSUES

ISSUE 1: What are the final Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amounts for the period January 2021 through December 2021?

TECO: The final Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amount for the period January 2021 through December 2021 is an over-recovery of \$4,939,848 including interest.
(Witness: Roche, Plusquellic)

ISSUE 2: What are the actual/estimated Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amounts for the period January 2022 through December 2022?

TECO: The actual/estimated Storm Protection Plan Cost Recovery Clause jurisdictional cost recover true-up amounts for the period January through December 2022 is an over-recovery of \$5,264,627 including interest.
(Witness: Roche, Plusquellic)

ISSUE 3: What are the projected Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery amounts for the period January 2023 through December 2023?

TECO: The projected Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery amount is \$64,853,846 for the period January 2023 through December 2023. The Commission is currently scheduled to conduct a hearing regarding the Storm Protection Cost Recovery Clause on November 1, 2022, to review and approve the proposed cost recovery factors to be used for the January 2023 through December 2023 period. The Commission approved the company's 2022-2031 Storm Protection Plan in Docket No. 20220048-EI in which the Transmission Access Enhancement Program in the company's 2020-2029 Storm Protection Plan would cease on December 31, 2022. Due to this modification, the company will provide an updated prehearing statement and supplemental testimony with updated costs and proposed cost recovery factors.
(Witness: Roche, Plusquellic)

ISSUE 4: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing Storm Protection Plan Cost Recovery factors for the period January 2023 through December 2023?

TECO: The Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing Storm Protection Plan Cost Recovery factors for the period January 2023 through December 2023 is \$54,649,371. The Commission is currently scheduled to conduct a hearing regarding the Storm Protection Cost Recovery Clause on November 1, 2022, to review and approve the proposed cost recovery factors to be used for the January 2023 through December 2023 period. The Commission approved the company's 2022-2031 Storm Protection Plan in Docket No. 20220048-EI in which the Transmission Access Enhancement Program in the company's 2020-2029 Storm Protection Plan would cease on December 31, 2022. Due to this modification, the company will provide an updated prehearing statement and supplemental testimony with updated costs and proposed cost recovery factors.
(Witness: Roche, Plusquellic)

ISSUE 5: What depreciation rates should be used to develop the depreciation expense included in the total Storm Protection Plan Cost Recovery Clause amounts for the period January 2023 through December 2023?

TECO: The depreciation rates from Tampa Electric's most current Depreciation Study, approved by Order No. PSC-2021-0423-S-EI issued November 10, 2021, within Docket No. 20210034-EI.
(Witness: Roche, Plusquellic)

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2023 through December 2023?

TECO: The appropriate jurisdictional separation factors are as follows:
FPSC Jurisdictional Factor: 93.2509%
FERC Jurisdictional Factor: 6.7491%
(Witness: Roche, Plusquellic)

ISSUE 7: What are the appropriate Storm Protection Plan Cost Recovery Clause factors for the period January 2023 through December 2023 for each rate group?

TECO: The January 2023 through December 2023 cost recovery clause factors utilizing the appropriate recognition of Federal Energy Regulatory Commission transmission jurisdictional separation, revenue tax factors and the rate design and cost allocation as put forth in Docket No. 20210034-EI are as follows:

Cost Recovery Factors	
<u>Rate Schedule</u>	<u>(cents per kWh)</u>
RS	0.373
GS and CS	0.373
GSD Optional – Secondary	0.144
GSD Optional – Primary	0.143
GSD Optional – Subtransmission	0.141
LS-1, LS-2	1.453

Cost Recovery Factors	
<u>Rate Schedule</u>	<u>(dollars per kW)</u>
GSD – Secondary	0.61
GSD – Primary	0.60
GSD – Subtransmission	0.59
SBD – Secondary	0.61
SBD – Primary	0.60
SBD – Subtransmission	0.59
GSLD - Primary	0.54
GSLD - Subtransmission	0.06

The Commission is currently scheduled to conduct a hearing regarding the Storm Protection Cost Recovery Clause on November 1, 2022, to review and approve the proposed cost recovery factors to be used for the January 2023 through December 2023 period. The Commission approved the company’s 2022-2031 Storm Protection Plan in Docket No. 20220048-EI in which the Transmission Access Enhancement Program in the company’s 2020-2029 Storm Protection Plan would cease on December 31, 2022. Due to this modification, the company

will provide an updated prehearing statement and supplemental testimony with updated costs and proposed cost recovery factors.

(Witness: Roche, Plusquellic)

ISSUE 8: What should be the effective date of the new Storm Protection Plan Cost Recovery Clause factors for billing purposes?

TECO: The effective date of the new Storm Protection Plan Cost Recovery Clause factors should be January 1, 2023.

(Witness: Roche, Plusquellic)

ISSUE 9: Should the Commission approve revised tariffs reflecting the new Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding?

TECO: Yes, the Commission should approve revised tariffs reflecting the new Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding.

(Witness: Roche, Plusquellic)

ISSUE 10: Should this docket be closed?

TECO: Yes, Docket No. 20220010-EI should be closed once the Commission's decisions on all the issues in the docket have become final and the Commission has concluded that the docket has otherwise met the requirements for closure.

(Witness: Roche, Plusquellic)

F. STIPULATED ISSUES

Tampa Electric is not aware of any stipulated issues as of this date.

G. PENDING MOTIONS

Tampa Electric is not aware of any pending motions as of this date.

H. PENDING CONFIDENTIALITY CLAIMS OR REQUESTS

Tampa Electric has no pending confidentiality claims or requests at this time.

I. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

Tampa Electric has no objections to any witness' qualifications as an expert in this proceeding.

J. STATEMENT OF SEQUESTRATION OF WITNESSES

Tampa Electric does not request the sequestration of any witnesses at this time.

K. COMPLIANCE WITH ORDER NO. PSC-2022-0111-PCO-EI

Tampa Electric has complied with all requirements of the Order Establishing Procedure entered in this docket.

DATED this 7th day of October 2022.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Prehearing Statement, filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 7th day of October 2022 to the following:

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