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Public Service Commission

May 8, 2026

STAFF'S FIRST DATA REQUEST

via email

J. Jeffrey Wahlen, Esq.
Malcolm N. Means, Esq.
Matthew J. Jones, Esq.
Ausley Law Firm
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RE: Docket No. 20260062-EI – Petition for approval of revised depreciation rates for Bayside Power Station assets, by Tampa Electric Company.

Dear Mr. Wahlen, Mr. Means, and Mr. Jones:

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

1. Please refer to witness Chronister's Direct Testimony, page 10, line 4, and explain the referenced "Docket No. 20241443-EI."
2. Please refer to witness Chronister's Direct Testimony, page 10, line 11, through page 11, line 8, for the questions below:
 - a. Please identify the benefits to the Company, if any, which would result from deferring the revision of Bayside Power Station assets' depreciation rates until TECO's next full depreciation study.
 - b. Please identify all the detriments to the Company, if any, which would result from deferring the revision of Bayside Power Station assets' depreciation rates until TECO's next full depreciation study.

- c. Please identify all the benefits to TECO's customers, if any, which would result from deferring the revision of Bayside Power Station assets' depreciation rates until TECO's next full depreciation study.
 - d. Please identify all the detriments to TECO's customers, if any, which would result from deferring the revision of Bayside Power Station assets' depreciation rates until TECO's next full depreciation study.
 - e. Please elaborate on the statement "[a]pproving the company's proposed revised depreciation rates will benefit customers by more accurately matching the costs of providing electric service to the periods in which service is provided" on page 11. Please also explain how the customers would receive benefit starting from the effective date of such revised depreciation rates until the customer rates are changed in TECO's next rate case proceeding.
3. Please refer to witness Stryker's Direct Testimony, page 9, lines 10 - 25, and TECO's Petition, Exhibit 1, for the questions below:
- a. Please explain the modeling process and software used pertaining to the witness's testimony at lines 14 - 17.
 - b. The witness testified that "[t]he next expected rotor replacements for Bayside Unit 1 and Unit 2 combustion turbines would be 2051 and 2056, respectively." (lines 24 - 25) What impacts do the dates of the next expected rotor replacements have on Bayside Units 1 and 2's respective Probable Retirement Dates of 12-2048 and 12-2049 (listed in Exhibit 1 of TECO's Petition)? Please explain the relationship between these two set of dates.
4. Please refer to witness Stryker's Direct Testimony, page 5, lines 1 - 7; page 9, lines 4 - 8; page 10, lines 7 - 11; and TECO's Petition, Exhibit 1, for the question below:

On page 9 of his testimony, witness Stryker indicated that TECO proposed to extend the Probable Retirement Date of Bayside Units 1 and 2 by ten years due to the recent retrofits and the currently ongoing retrofitting of these units. However, as described on page 5 of witness Stryker's Direct Testimony, Bayside Units 3 through 6 are also CTs; but there is no mention of these units having been retrofitted, or undergoing any retrofitting like that being included in Units 1 and 2. Please explain why TECO also proposed to extend the Probable Retirement Date of Units 3, 4, 5 and 6 by ten years, from 12-2049 to 12-2059, as shown in TECO's Petition, Exhibit 1.

5. Please refer to witness Allis' Direct Testimony, page 16, lines 8 - 13, and provide responses to the following:
 - a. Please elaborate on the statement "estimating the lives of several years' installation for a particular facility inasmuch as a single concurrent retirement for all the years of installation will occur at that specified date."
 - b. Please explain the difference between a facility's "years of installation" and the facility's "in-service years."
6. Please refer to witness Allis' Direct Testimony, page 17, lines 14 - 15, and briefly summarize the "Contractual Service Agreements."
7. Please refer to witness Allis' Direct Testimony, page 18, lines 8 - 12, and identify the survivor curve estimates for Account 343.1 that are currently used by each of the stated "other utilities in the state."
8. Please refer to witness Allis' Direct Testimony, pages 19 - 20. The witness testified that "First, as discussed above, the Company has performed additional upgrades including GE Vernova Advanced Gas Path upgrades across Bayside units. [. . .] Based on these considerations, it is reasonable to increase the life spans for the combined cycle and simple cycle units at Bayside by 10 years. This results in a 45-year life span for the combined cycle units and a 50-year life span for the simple cycle units."

Please refer to witness Allis' Exhibit No. NA-1, Document 1. Page 93 of 95, which reads "[s]ince the last depreciation study, several changes support extending the life span estimates for the Bayside combined cycle and simple cycle units." Page 95 of 95 in the same document reads "Tampa Electric has implemented performance and reliability upgrades consistent with continued long-term operation, including GE Vernova Advanced Gas Path technology across Bayside units, which is expected to extend major maintenance intervals for these types of components."

- a. What does "across Bayside units" mean? Does it include Bayside Units 3 through 6?
- b. Please provide details regarding the upgrades, including GE Vernova Advanced Gas Path technology, for Bayside Units 3, 4, 5 and 6, and identify the locations where this may be discussed in the relevant testimonies of TECO's witnesses and/or TECO's Petition.
- c. If Units 3 through 6 have not been retrofitted, please explain in detail why the Probable Retirement Date/life span for Bayside Units 3, 4, 5 and 6 should be extended for ten years.

9. On pages 19 - 20 of his Direct Testimony, witness Allis testified that “[t]here are several factors impacting the service life of Bayside that have changed since the last depreciation study. [. . .] Second, future demand for electricity is expected to be stronger than anticipated, which increases capacity and reliability needs on the system. [. . .] Based on these considerations, it is reasonable to increase the life spans for the combined cycle and simple cycle units at Bayside by 10 years.”

Since a stronger than anticipated future demand for electricity would result in the generation unit running more frequently, hence, leading to more wear and tear to the unit, please explain how the stronger future demand for electricity would contribute to a longer service life of Bayside units (extended Probable Retirement Date).

10. Please refer to witness Allis’ Direct Testimony, pages 19 - 20. In explaining the reasons for his proposed longer life span, witness Allis testified that “[t]here are several factors impacting the service life of Bayside that have changed since the last depreciation study. [. . .] Finally, the outlook for fossil generation has evolved in a way that supports continued use of Bayside, including its role in supporting system reliability and following variable solar load. Based on these considerations, it is reasonable to increase the life spans for the combined cycle and simple cycle units at Bayside by 10 years.”

In his Rebuttal Testimony, pages 18 - 20, pertaining to TECO’s 2023 Depreciation Study, in Docket No. 20240026-EI, witness Allis testified that “it has become common for even newer base load facilities to follow load (or more precisely follow renewable generation) and cycle more frequently. [. . .] increased cycling – particularly if there are more starts throughout the year – can limit or reduce the life span of the facility. [. . .] operations of the Tampa Electric's combined cycles will likely favor a shorter life, all else equal.”

Please explain how Bayside units’ role of “following variable solar load” would contribute to a longer service life of the Bayside units (extended Probable Retirement Date).

11. Please refer to witness Allis’ Direct Testimony, page 26, lines 8 - 16, and elaborate on the statement “using remaining lives weighted consistent with the average service life procedure.”
12. Please refer to witness Allis’ Direct Testimony, Exhibit No. NA-1, Document 1, page 38 of 95. On this page, the last sentence of the second paragraph reads “A narrative discussion of the considerations for each interim net salvage estimate for production plant accounts is provided in the section beginning on page X-2.” However, the section beginning on page X-2 (Exhibit No. NA-1, Document 1, pages 93 through 95) does not contain any discussion of net salvage. Please provide the “narrative discussion of the considerations for each interim net salvage estimate for production plant accounts” as stated.

13. Please refer to witness Allis' Direct Testimony, Exhibit No. NA-1, Document 1, pages 39 and 59 of 95, for the requests below:
 - a. Please provide a comparison of each account's Net Salvage Estimate, as listed at top of page 39 of 95, and the Net Salvage Estimate approved in TECO's last depreciation study.
 - b. Please explain in detail, with examples and supporting data, how each Net Salvage Estimate appearing in Column 6, Interim Retirements Net Salvage (%), Table 4 at page 59 of 95, was derived.

Please file all responses electronically no later than June 8, 2026, through the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. *In addition, please email the filed response to discovery-gcl@psc.state.fl.us.*

Please feel free to call me at (850) 413- 6218 if you have any questions.

Sincerely,

/s/ Suzanne Brownless
Suzanne Brownless
Special Counsel

SBr/ds

cc: Office of Commission Clerk