BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Rate Increase by) Tampa Electric Company) DOCKET NO. 080317-EI) FILED: FEBRUARY 5, 900 NOTICE OF FILING THE FLORIDA RETAIL FEDERATION LATE-FILED EXHIBIT NO. 123 The Florida Retail Federation, pursuant to instructions by C the Commission at the conclusion of the hearing in this docket, and by and through its undersigned counsel, hereby gives notice of filing its Late-Filed Exhibit No. 123. A copy of the Exhibit is attached to this Notice of Filing.

Respectfully submitted this 5th day of February, 2009.

Robert Scheffel Wilght U Florida Bar No. 966721 John T. LaVia, III Florida Bar No. 853666 Young van Assenderp, P.A. 225 South Adams Street, Suite 200 Tallahassee, Florida 32301 (850) 222-7206 Telephone (850) 561-6834 Facsimile

Attorneys for the Florida Retail Federation

COM ECR GCL 4 OPC RCP 1 SSC 1 SGA 2 ADM ____

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FPSC-COMMISSION CLERK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic delivery and U.S. Mail this 5th day of February, 2009, to the following:

Jean Hartman/Keino Young Jennifer Brubaker/Martha Brown Florida Public Service Commission Division of Legal Services 2540 Shumard Oak Boulevard Tallahassee, Florida 32399

Lee Willis/James Beasley Ausley Law Firm P.O. Box 391 Tallahassee, FL 32302

J.R. Kelly/Patricia Christensen Office of Public Counsel c/o the Florida Legislature 111 W. Madison Street Room 812 Tallahassee, FL 32399-1400

Paula K. Brown Tampa Electric Company Regulatory Affairs P.O. Box 111 Tampa, FL 33601-0111

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effective

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TAMPA ELECTRIC COMPANY, DOCKET NO. 080317-EI IMPACT ON CONSUMERS OF DEBT AND EQUITY COSTS "BANG FOR THE BUCK" ANALYSIS

Cost of Capital Savings to Consumers vs. Company's Base Case of 12.0% ROE and 6.8% Interest Rate on Long-Term Bonds

Tampa Electric Capital Structure

	Base Case - New Rates in 2009, Rates Stay Constant Through 201	3	2009 Only	<u>2009-2013*</u>
Base Case	ROE @ 12.0%, LT Debt @ 6.8%		\$0	\$0
	ROE @ 9.75%, LT Debt @ 6.8%	(A)	\$67,367,000	\$287,987,000
	ROE @ 9.75%, LT Debt @ 7.3%	(B)	\$60,379,000	\$257,664,000
	ROE @ 9.75%, LT Debt @ 7.8%	(C)	\$53,391,000	\$227,341,000
	ROE @ 9.75%, LT Debt @ 8.8%	(D)	\$39,493,000	\$166,696,000
	"Instant Rate Case" Scenario - Assi	umes		
	New Rates Every Year, 2009-2013	<u> 8</u>		
Base Case	ROE @ 12.0%, LT Debt @ 6.8%			
	ROE @ 9.75%, LT Debt @ 6.8%	(A)	\$67,367,000	\$293,537,000
	ROE @ 9.75%, LT Debt @ 7.3%	(B)	\$60,379,000	\$256,161,000
	ROE @ 9.75%, LT Debt @ 7.8%	(C)	\$53,391,000	\$218,785,000
	ROE @ 9.75%, LT Debt @ 8.8%	(D)	\$39,493,000	\$144,033,000

- NOTES: The values shown represent the <u>savings</u> to customers if the Commission sets rates based on the 9.75% ROE and the interest rates as specified in the sensitivity cases (A) through (D). Equivalently, these values show the <u>extra cost</u> to customers if the Commission sets rates based on the Company's requested 12.0% ROE vs. each comparison case.
- The "Instant Rate Case" scenario assumes that the Company's <u>entire</u> debt is refinanced at the higher interest rates in each year.
- Case (A) illustrates the cost impact on consumers if the Company would remain at a BBB rating and interest rates stay the same with ROE set at 9.75%. The Company's witnesses cannot confirm that the Company's bond rating would change even with the requested 12.0% ROE. Gillette, TR 269-271, 495; Abbott, TR 616-617.

Case (B) illustrates the cost impact on consumers if the Company would incur long-term interest cost that is greater than the Company's 6.8% value by 50 basis points. O'Donnell, TR 2382-2383

- Case (C) illustrates the cost impact on consumers if the Company would incur long-term interest cost that is greater than the Company's 6.8% value by 100 basis points. Abbott, TR 620
- Case (D) illustrates the cost impact on consumers if the Company would incur long-term interest cost that is greater than the Company's 6.8% value by 200 basis points. Gillette, TR 460, 486
- The interest rate spreads for A vs. BBB-rated bonds are based on the record citations shown. Additionally, casual examination of Exhibit 80, page 2 (Gillette) shows that, before the "credit meltdown" in September 2008, the spread between A vs. BBB interest rates was between approximately 35 basis points and approximately 100 basis points.
- The 2009-2013 values are net present values using a discount rate equal to Tampa Electric's weighted average cost of capital per the Company's proposal, 8.82%.
 Source for weighted average cost of capital: MFR D1-a, page 1 of 3.

Calculation of Impact on Customers for a Higher ROE to Obtain a Lower Cost of Debt 2009, Company Proposal vs. 9.75% ROE and 6.8% Long-Term Interest Rate

	Company		Cost	Wgtd. Cost	Tax Gross-Up	Wgtd. Pre-Tax
Component	Request	Ratio (%)	Rate (%)	Rate (%)	Factor	Cost of Cap
	(000's)					
Long-Term Debt	\$1,397,565	38.22%	6.80%	2.60%	1.000	2.60%
Short-Term Debt	\$8,002	0.22%	4.63%	0.01%	1.000	0.01%
Customer Deposits	\$103,724	2.84%	6.07%	0.17%	1.000	0.17%
Tax Credits	\$8,780	0.24%	9.75%	0.02%	1.000	0.02%
Deferred Inc. Taxes	\$302,744	8.28%	0.00%	0.00%	1.000	0.00%
Common Equity	\$1,835,985	50.21%	12.00%	6.02%	1.635	9.85%
	\$3,656,800	100.00%		8.83%		12.65%

Total Cost of Capital to Consumers = Rate Base x Pre-Tax Cost of Capital =

\$462,585,200

	Company		Cost	Wgtd. Cost	Tax Gross-Up	Pre-Tax							
Component	Request	Ratio (%)	Rate (%)	Rate (%)	Factor	Cost of Cap							
	(000's)												
Long-Term Debt	\$1,397,565	38.22%	6.80%	2.60%	1.000	2.60%							
Short-Term Debt	\$8,002	0.22%	4.63%	0.01%	1.000	0.01%							
Customer Deposits	\$103,724	2.84%	6.07%	0.17%	1.000	0.17%							
Tax Credits	\$8,780	0.24%	9.75%	0.02%	1.000	0.02%							
Deferred Inc. Taxes	Faxes \$302,744 8.28% 0.00%												
Common Equity	\$1,835,985 50.21% 9.75% 4.90% 1.635												
	\$3,656,800	100.00%		7.70%		10.81%							
Total Cost of Capital to Consumers = Rate Bas	Total Cost of Capital to Consumers = Rate Base x Pre-Tax Cost of Capital =												
Net Savings to Consumers with ROE @ 9.75% Net Additional Cost to Consumers under Comp	and LT intere-	est rate at 6.8	% vs. Comp 75% and I	oany proposal T interest rate	= = @ 6.8% =	\$67,367,133 \$67,367,133							

NOTE: Rate base, capital structure, and cost rates are from MFR D1-a, except where the ROE and long-term interest rates are varied as specified in the comparison case.

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Calculation of Impact on Customers for a Higher ROE to Obtain a Lower Cost of Debt 2009, Company Proposal vs. 9.75% ROE and 7.3% Long-Term Interest Rate

	Company		Cost	Wgtd. Cost	Tax Gross-Up	Wgtd. Pre-Tax
Component	Request	Ratio (%)	Rate (%)	Rate (%)	Factor	Cost of Cap
	(000's)					
Long-Term Debt	\$1,397,565	38.22%	6.80%	2.60%	1.000	2.60%
Short-Term Debt	\$8,002	0.22%	4.63%	0.01%	1.000	0.01%
Customer Deposits	\$103,724	2.84%	6.07%	0.17%	1.000	0.17%
Tax Credits	\$8,780	0.24%	9.75%	0.02%	1.000	0.02%
Deferred Inc. Taxes	\$302,744	8.28%	0.00%	0.00%	1.000	0.00%
Common Equity	\$1,835,985	50.21%	12.00%	6.02%	1.635	9.85%
	\$3,656,800	100.00%		8.83%		12.65%

Total Cost of Capital to Consumers = Rate Base x Pre-Tax Cost of Capital =

\$462,585,200

	Company		Cost	Wgtd. Cost	Tax Gross-Up	Pre-Tax
Component	Request	Ratio (%)	Rate (%)	Rate (%)	Factor	Cost of Cap
	(000's)				· · · · ·	
Long-Term Debt	\$1,397,565	38.22%	7.30%	2.79%	1.000	2.79%
Short-Term Debt	\$8,002	0.22%	4.63%	0.01%	1.000	0.01%
Customer Deposits	\$103,724	2.84%	6.07%	0.17%	1.000	0.17%
Tax Credits	\$8,780	0.24%	9.75%	0.02%	1.000	0.02%
Deferred Inc. Taxes	\$302,744	8.28%	0.00%	0.00%	1.000	0.00%
Common Equity	\$1,835,985	50.21%	9.75%	4.90%	1.635	8.00%
	\$3,656,800	100.00%		7.89%		11.00%
Total Cost of Capital to Consumers =	Rate Base x Pre-Tax (Cost of Capita	1 =			\$402,205,892
Net Savings to Consumers with ROE	@ 9.75% and LT intere	est rate at 7.3	% vs. Comp	oany proposal	=	\$60,379,308
Net Additional Cost to Consumers und	der Company proposal	vs. ROE @ 9	75% and L	T interest rate	@ 7.3% =	\$60,379,308

NOTE: Rate base, capital structure, and cost rates are from MFR D1-a, except where the ROE and long-term interest rates are varied as specified in the comparison case.

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Calculation of Impact on Customers for a Higher ROE to Obtain a Lower Cost of Debt 2009, Company Proposal vs. 9.75% ROE and 7.8% Long-Term Interest Rate

	Company		Cost	Wgtd. Cost	Tax Gross-Up	Wgtd. Pre-Tax
Component	Request	Ratio (%)	Rate (%)	Rate (%)	Factor	Cost of Cap
	(000's)					
Long-Term Debt	\$1,397,565	38.22%	6.80%	2.60%	1.000	2.60%
Short-Term Debt	\$8,002	0.22%	4.63%	0.01%	1.000	0.01%
Customer Deposits	\$103,724	2.84%	6.07%	0.17%	1.000	0.17%
Tax Credits	\$8,780	0.24%	9.75%	0.02%	1.000	0.02%
Deferred Inc. Taxes	\$302,744	8.28%	0.00%	0.00%	1.000	0.00%
Common Equity	\$1,835,985	50.21%	12.00%	6.02%	1.635	9.85%
	\$3,656,800	100.00%		8.83%		12.65%

Total Cost of Capital to Consumers = Rate Base x Pre-Tax Cost of Capital =

\$462,585,200

	Company		Cost	Wgtd. Cost	Tax Gross-Up	Pre-Tax						
Component	Request	Ratio (%)	Rate (%)	Rate (%)	Factor	Cost of Cap						
	(000's)											
Long-Term Debt	\$1,397,565	38.22%	7.80%	2.98%	1.000	2.98%						
Short-Term Debt	\$8,002	0.22%	4.63%	0.01%	1.000	0.01%						
Customer Deposits	\$103,724	2.84%	6.07%	0.17%	1.000	0.17%						
Tax Credits	\$8,780	0.24%	9.75%	0.02%	1.000	0.02%						
Deferred Inc. Taxes	\$302,744	8.28%	0.00%	0.00%	1.000	0.00%						
Common Equity	\$1,835,985	50.21%	9.75%	4.90%	1.635	8.00%						
	\$3,656,800	100.00%		8.08%		11.19%						
Total Cost of Capital to Consumers = Rate Base x Pre-Tax Cost of Capital =												
Net Savings to Consumers with ROE @ 9.75%	and LT intere	est rate at 7.8	% vs. Com	oany proposa	=	\$53,391,483						
Net Additional Cost to Consumers under Comp	oany proposal	vs. ROE @ 9	9.75% and L	T interest rate	e @ 7.8% =	\$53,391,483						

NOTE: Rate base, capital structure, and cost rates are from MFR D1-a, except where the ROE and long-term interest rates are varied as specified in the comparison case.

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Calculation of Impact on Customers for a Higher ROE to Obtain a Lower Cost of Debt 2009, Company Proposal vs. 9.75% ROE and 8.8% Long-Term Interest Rate

	Company		Cost	Wgtd. Cost	Tax Gross-Up	Wgtd. Pre-Tax
Component	Request	Ratio (%)	Rate (%)	Rate (%)	Factor	Cost of Cap
	(000's)					
Long-Term Debt	\$1,397,565	38.22%	6.80%	2.60%	1.000	2.60%
Short-Term Debt	\$8,002	0.22%	4.63%	0.01%	1.000	0.01%
Customer Deposits	\$103,724	2.84%	6.07%	0.17%	1.000	0.17%
Tax Credits	\$8,780	0.24%	9.75%	0.02%	1.000	0.02%
Deferred Inc. Taxes	\$302,744	8.28%	0.00%	0.00%	1.000	0.00%
Common Equity	\$1,835,985	50.21%	12.00%	6.02%	1.635	9.85%
-	\$3,656,800	100.00%		8.83%		12.65%

Total Cost of Capital to Consumers = Rate Base x Pre-Tax Cost of Capital =

Company Cost Wgtd. Cost Tax Gross-Up Pre-Tax Component Request Ratio (%) Rate (%) Rate (%) Factor Cost of Cap (000's) Long-Term Debt \$1,397,565 38.22% 8.80% 3.36% 1.000 3.36% Short-Term Debt \$8.002 0.22% 4.63% 0.01% 1.000 0.01% Customer Deposits \$103.724 2.84% 6.07% 0.17% 1.000 0.17% **Tax Credits** 0.24% \$8,780 9.75% 0.02% 1.000 0.02% Deferred Inc. Taxes \$302,744 8.28% 0.00% 1.000 0.00% 0.00% Common Equity \$1,835,985 50.21% 9.75% 4.90% 1.635 8.00% \$3,656,800 100.00% 8.46% 11.57% Total Cost of Capital to Consumers = Rate Base x Pre-Tax Cost of Capital = \$423.091.760 Net Savings to Consumers with ROE @ 9.75% and LT interest rate at 8.8% vs. Company proposal = \$39,493,440 Net Additional Cost to Consumers under Company proposal vs. ROE @ 9.75% and LT interest rate @ 8.8% = \$39,493,440

NOTE: Rate base, capital structure, and cost rates are from MFR D1-a, except where the ROE and long-term interest rates are varied as specified in the comparison case.

\$462,585,200

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Rate Base Calculations and Assumptions for Years 2010-2013

Start with TECO's jurisdictional rate base for 2009 = \$3,656,800,000

In 2010, the rate base will be:

2009 rate base MINUS depreciation expense associated w/ the 2009 rate base, which is \$194,608,000 (MFR C-1, page 1 of 3)

PLUS

2010 plant additions of \$669,153,855

MINUS

The depreciation expense associated with the Company's estimated 2010 plant additions (calculated from Exhibit 13, Item No. 44, which is the Company's response to OPC POD Request No. 46, Bates-stamped page no. 58612)

The depreciation expense associated with the plant additions is calculated as follows:

TECO jurisdictional Plant In Service (PIS) in 2009 is \$5,644,926,000 (MFR B-1, page 1 of 3)

The depreciable part of that PIS amount is estimated as follows:

Jurisdictional company PIS = \$5,644,926,000Total company non-depreciables = \$43,315,000 + \$7,134,000 + \$4,971,000 =\$55,420,000 (MFR B-7, page 9 of 27); multiplied by the Company's total rate base jurisdictional separation factor of 0.962302 (MFR B-1, page 1 of 3), this indicates jurisdictional non-depreciables of $$55,420,000 \times ...962302 =$ \$53,330,776.

Thus, the jurisdictional plant in service that is comparable to the jurisdictional depreciation expense is estimated as = jurisdictional PIS – jurisdictional percentage of non-depreciables = \$5,591,595,224 (calc)

Dividing the jurisdictional depreciation expense (\$194,608,000, from MFR B-1) by the foregoing = 3.480%

Thus, the depreciation on the 2010 capital additions is estimated as:

.0348 x \$669,153,855 = \$23,286,554

Thus, 2010 Rate Base =

\$3,656,800,000 - \$194,608,000 + \$669,153,855 - \$23,286,554 = **<u>\$4,108,059,301</u>**

For succeeding years, the same depreciation expense ratio was applied to cumulative plant additions, which were derived from Exhibit 13, Item No. 44, which is the Company's response to OPC POD Request No. 46, Bates-stamped page no. 58612.

The capitalization for the Company's rate base was calculated assuming:

- a. the Company's rate base as calculated above;
- b. that the Company would issue debt as testified to by Witness Gillette, TR 442, i.e., \$125MM in 2010, \$125MM in 2011, \$500MM in 2012, and \$125MM in 2013;
- c. that the amounts of capitalization provided through all other capital components, other than common equity, would remain constant at the Company's 2009 values per MFR D1-a; and
- d. that common equity would make up the difference between (i) rate base and (ii) the total capital from all other sources.

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TAMPA ELECTRIC COMPANY DOCKET NO. 080317-EI OPC'S FIRST REQUEST FOR PODS FILED: SEPTEMBER 29, 2008

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U

2008 - 2013 PLANT IN-SERVICE

Staff Composite Exh 13 # 44 OPC POD 46

		Data	No.						
INDEX	LOCATIONS	2008	2009	2010	2011	2012	2013		
Contraction 22	1 Dinner Lake	÷	•	•		•	•		
	2 Bayside/Gannon	-	•	•		•	-		
	3 Gannon Amortized		366,250	366,250	366,250	366,250	366,250		
	4 Big Bend	1,363,349,619	1,429,228,877	1,440,988,028	1,448,086,960	1,459,619,930	1,485,609,528		
	5 Hookers	-	•	-94 ·	-		•		
	6 Misc. Prod.	1,903,284	2,250,712	2,260,712	2,280,712	2,260,712	2,280,712		
	9 Polk 4	35,016,810	35,018,810	35,016,810	35,018,810	35,016,810	35,016,810		
1	0 Polk 6	34,220,528	34,220,628	34,220,528	34,220,528	34,220,528	34,220,528		
1	1 Polk 8 (CC1) H88	•	•			-	537,628,900		
age: S	Transmission - Interconnect	-					23,561,656		
	Transmission - NGCC			•			72,701,828		
	NGCC		a Shanna 🛧 Sha		8900 - E. C E. C E. C				
12	2 Amiz Tools 7	4,095,340	3,817,778	3,002,216	2,386,654	1,771,091	1,155,529		
1	3 Phillips	60,414,040	60,880,040	61,158,481	61,436,922	61,715,363	61.993,804		
i i	Bavelde	782,746,302	785,539,424	784,488,194	777,842,965	772,319,738	787,998,507		
1	SIBE CT1	1.784.838	1,754,838	1,754,838	1,754,838	1.754.838	1.754.838		
10	668 CT243	•	*	-	•	· · · · · ·	•		
1	GNCT		•	•		•			
1	B GN Diamanting			•	•				
1	Polk	598,023,918	605,073,951	812,473,551	615,598,151	618,414,751	623,139,351		
2	0001	6,498,548	8,498,548	6,496,548	8,498,548	8,498,548	6,496,548		
2	Baveide 1 CSA	35,430,725	35,430,725	35,430,725	35,430,725	38,430,725	47,343,000		
2	Beyside 2 CSA		38,238,843	38,238,843	38,238,843	38,238,843	38,238,843		
2	Polk 1 CBA	23,470,000	23,470,000	41,370,000	28,108,000	28,108,000	28,108,090		
2	Polk 2 CSA	12,443,000	12,443,000	12,443,000	12,443,000	12,443,000	12,443,000		
2	Polk 3 CSA	•			12,074.000	12,074,000	12,074,000		
25	Polk 4 CSA	-		•	•	•			
27	Polk 5 CBA	•	•		•	•	•		
2	BB1 SCR	•	•	97,843,822	97,543,822	97,843,822	97,643,822		
26	BB1 SCR	•	96,953,039	95,963,039	95,953,039	95,953,039	96,953,039		
34	BBS SCR	76,780,773	76,780,773	78,780,773	76,780,773	78,780,773	76,780,773		
81	BB4 SCR	60,841,734	60,841,734	60,641,734	60,841,734	80.841,734	60,841,734		
37	Sinuctures	76,054,285	80,196,699	82,411,833	84,664,767	87,072,700	89,610,634		
33	Avr Amtz	20,873,469	25,344,592	26,798,883	28,584,575	27,529,884	31,379,882		
34	Syr Amtz	29,378,337	42,117,789	48,180,002	82,795,973	64,684,937	68,299,370		
35	Fiber Optic	21,467,720	22,400,947	23,425,947	24,486,947	25,684,947	28,720,947		
3	Tyr Amiz	32,809,742	32,962,742	29,491,615	26,087,188	22,725,827	19,581,237		
37	Vehicles	17,586,466	18,121,456	18,602,971	19,098,151	19,661,407	20,186,160		
39	Land	41,722,073	61,722,573	41,722,073	41,722,073	41,722,073	41,722,073		
40	Tranamission	478,262,777	520,553,897	581,352,692	624.828.373	664,452,472	689,878,443		
	Cletribution	1,734,691,483	1,832,621,419	1,934,404,441	2,041,137,318	2,163,330,324	2,281,899,286		
<u> </u>	BAYSIDE 560 CTS	•	100,547,280	100.547,280	100,547,280	100,547,280	100.547,280		
	BATSICE SAA CI'S		83,684,984	10,004,004	93,694,954	83,894,964	83,894,984		
	BIG BEND 4 CI		51,0/1,005	01,0/1,000	00U.(10,1C	51,871,065	61,8/1,068		
43	FUTURE CT 8	*		•	·····	36,197,200	56,167,200		
<u>\$</u> ;	PULLER CI /		*			00,197,200	05,107,200		
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	PURING CT V			<u></u>	-	· · · · · ·			
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<u>61</u>			•	•	•				
52			7 400 700	7 400 200	7 400 744	* 444 ***			
(oueloc)	ALC: NO	7,133,796	7,133,790	7,133,780	7,133,795	7,133,795	7,133,796		
مر	Roleins/	·····	40.000 000	40 000 000	10 000 000	48 000 000			
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