AUSLEY & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

123 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

RECEIVED-FPSC

11 SEP 12 PM 2: 47

COMMISSION CLERK

September 12, 2011

HAND DELIVERED

Ms. Ann Cole, Director Division of Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re:

Environmental Cost Recovery Clause

FPSC Docket No. 110007-EI

Dear Ms. Cole:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Preliminary List of Issues and Positions.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,

James D. Beasley

JDB/pp Enclosures

COM CC:

APA |
ECR |
GCL |
RAD |
SRC |
ADM |

All Parties of Record (w/enc.)

DOCUMENT NUMBER DATE

06545 SEP 12 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental Cost)	
Recovery Clause.)	DOCKET NO. 110007-EI
•)	FILED: September 12, 2011

TAMPA ELECTRIC COMPANY'S PRELIMINARY LIST OF ISSUES AND POSITIONS

Tampa Electric Company ("Tampa Electric" or "the company") hereby submits its Preliminary List of the Issues and Positions to be taken up at hearing scheduled to commence on November 1, 2011 in the above docket.

ISSUE 1: What are the final environmental cost recovery true-up amounts for the period January 2010 through December 2010?

Tampa Electric's Position: An under-recovery of \$2,616,798. (Witness: Bryant)

ISSUE 2: What are the estimated/actual environmental cost recovery true-up amounts for the period January 2011 through December 2011?

<u>Tampa Electric's Position</u>: An under-recovery of \$464,090. (Witness: Bryant)

ISSUE 3: What are the projected environmental cost recovery amounts for the period January 2012 through December 2012?

<u>Tampa Electric's Position</u>: The appropriate amount of environmental costs projected to be recovered for the period January 2012 through December 2012 is \$84,067,581. (Witness: Bryant)

ISSUE 4: What are the environmental cost recovery amounts, including true-up amounts, for the period January 2012 through December 2012?

DOCUMENT NUMBER DATE

06545 SEP 12 =

<u>Tampa Electric's Position</u>: The total environmental cost recovery amount, including true-up amounts, for the period January 2012 through December 2012 is \$87,211,216 after the adjustment for taxes. (Witness: Bryant)

ISSUE 5: What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery amounts for the period January 2012 through December 2012?

<u>Tampa Electric's Position</u>: The depreciation rates used to calculate the depreciation expense shall be the rates that are in effect during the period the allowed capital investment is in service. (Witness: Bryant)

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2012 through December 2012?

<u>Tampa Electric's Position</u>: The demand jurisdictional separation factor is 99.58152%. The energy jurisdictional separation factors are calculated for each month based on retail kWh sales as a percentage of projected total system kWh sales. These are shown on the schedules sponsored by witness Bryant. (Witness: Bryant)

<u>ISSUE 7</u>: What are the appropriate environmental cost recovery factors for the period January 2012 through December 2012 for each rate group?

<u>Tampa Electric's Position</u>: The appropriate environmental cost recovery factors are as follows:

Factor at Secondary

Rate Class

Voltage (\$\footnote{k}Wh)

RS

0.460

GS, TS		0.460
GSD, SBF		
	Secondary	0.458
	Primary	0.453
	Transmission	0.449
IS		
	Secondary	0.450
	Primary	0.446
	Transmission	0.441
LS1		0.456
Average Factor		0.459
(Witness: Bryant)		

ISSUE 8: What should be the effective date of the new environmental cost recovery factors for billing purposes?

<u>Tampa Electric's Position</u>: The factors should be effective beginning with the specified environmental cost recovery cycle and thereafter for the period January 2012 through December 2012. Billing cycles may start before January 1, 2012, and the last cycle may be read after December 31, 2012, so that each customer is billed for 12 months regardless of when the adjustment factor became effective. (Witness: Bryant)

DATED this 12 day of September 2011.

Respectfully submitted,

JAMES D. BEASLEY

J. JEFFRY WAHLEN

Ausley & McMullen

Post Office Box 391

Tallahassee, FL 32302

(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Preliminary List of Issues and

Positions filed on behalf of Tampa Electric Company has been furnished by hand delivery (*) or

U. S. Mail on this 12 day of September 2011 to the following:

Ms. Martha Carter Brown*
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Room 370N – Gerald L. Gunter Building
Tallahassee, FL 32399-0850

Ms. Patricia Christensen Associate Public Counsel Office of Public Counsel 111 West Madison Street – Suite 812 Tallahassee, FL 32399-1400

Ms. Vicki Kaufman Mr. Jon C Moyle Keefe Anchors Gordon & Moyle, PA 118 N. Gadsden Street Tallahassee, FL 32301

Mr. John T. Butler Managing Attorney - Regulatory Florida Power & Light Company 700 Universe Boulevard Juno Beach, FL 33408-0420

Mr. Kenneth Hoffman Florida Power & Light Company 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1859

Mr. Gary V. Perko Hopping Green & Sams, P.A. Post Office Box 6526 Tallahassee, FL 32314 Mr. John T. Burnett Dianne M. Triplett Progress Energy Service Co., LLC Post Office Box 14042 St. Petersburg, FL 33733

Mr. Paul Lewis, Jr. Progress Energy Florida, Inc. 106 East College Avenue, Suite 800 Tallahassee, FL 32301-7740

Ms. Susan Ritenour Secretary and Treasurer Gulf Power Company One Energy Place Pensacola, FL 32520

Mr. Jeffrey A. Stone Mr. Russell A. Badders Mr. Steven R. Griffin Beggs and Lane Post Office Box 12950 Pensacola, FL 32591-2950

Karen S. White, Staff Attorney AFCESA/ULFSC 139 Barnes Drive, Suite 1 Tyndall AFB, FL 32403-5319

ATTORNEY