

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost )  
Recovery Clause. )  
\_\_\_\_\_)

DOCKET NO. 20210010-EI  
FILED: July 12, 2021  
REVISED: July 15, 2021

**REVISED 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:**

<b>Witness</b>	<b>Subject Matter</b>	<b>Issues #</b>
<b>Direct</b>		
Mark R. Roche	Storm Protection Plan Cost Recovery True-Up and Projection	1,2,3,4,5,6,7,8,9,10
David L. Plusquellic	Storm Protection Plan Cost Recovery True-Up and Projection	1,2,3,4,5,6,7,8,9,10

**C. EXHIBITS:**

<b>Witness</b>	<b>Proffered By</b>	<b>Exhibit #</b>	<b>Description</b>
<b>Direct</b>			
Mark R. Roche	Tampa Electric Company	MRR-1; Schedule A-1, filed April 1, 2021	Schedules supporting cost recovery amount, actual January 2020 – December 2020

Mark R. Roche	Tampa Electric Company	MRR-2; Schedule E-1 and E-2, filed May 3, 2021; revised May 10, 2021.	Schedules supporting cost recovery amount, projected January 2021- December 2021.
Mark R. Roche	Tampa Electric Company	MRR-2; Schedule P-1, filed May 3, 2021; revised May 10, 2021.	Schedules supporting costs recovery amount, projected for the period January 2022 – December 2022
David Plusquellic	L. Tampa Electric Company	DLP-1 filed April 1, 2021	Storm Protection Plan Accomplishments
David Plusquellic	L. Tampa Electric Company	DLP-2 filed May 3, 2021; revised May 10, 2021	Project List and Summary of Costs

**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 2022 through December 2022. The Commission should find that Tampa Electric’s actual 2020 Storm Protection Plan costs were prudently incurred.

**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 2020 through December 2020?

**TECO:** The final Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery true-up amount for the period January 2020 through December 2020 is an under-recovery of \$4,996,136 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 2021 through December 2021?

**TECO:** For the period January through December 2021, the total net true-up /over-recovery is estimated to be \$443,115 including interest. Due to 2021 being the first year of cost recovery, the projected costs for 2020 were being recovered during the 2021 period, this resulted in an additional over-recovery amount during the period of \$990,560 including interest, which resulted in a total end of period true-up over-recovery of \$1,433,675 for 2021. (Witness: Roche, Plusquellic)

**ISSUE 3:** What are the projected Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery amounts for the period January 2022 through December 2022?

**TECO:** The projected Storm Protection Plan Cost Recovery Clause jurisdictional cost recovery amount is \$49,354,329 for the period January 2022 through December 2022. (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 2022 through December 2022?

**TECO:** The Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amount is \$47,955,157 including current period estimated true-up. (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 2022 through December 2022?

**TECO:** The depreciation rates from Tampa Electric’s most current Depreciation Study, approved by Order No. PSC-12-0175-PAA-EI issued April 3, 2012 within Docket No. 20110131-EI. (Witness: Roche, Plusquellic)

**ISSUE 6:** What are the appropriate jurisdictional separation factors for the projected period January 2022 through December 2022?

**TECO:** The appropriate jurisdictional separation factors are as follows:

FPSC Jurisdictional Factor 92.5763%

FERC Jurisdictional Factor 7.4237%

(Witness: Roche, Plusquellic)

**ISSUE 7:** What are the appropriate Storm Protection Plan Cost Recovery Clause factors for the period January 2022 through December 2022 for each rate group?

**TECO:** The January 2022 through December 2022 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. 20130040-EI are as follows:

<b><u>Rate Schedule</u></b>	<b><u>Cost Recovery Factors</u></b> <b><u>(cents per kWh)</u></b>
RS	0.291
GS and CS	0.292
GSD Optional – Secondary	0.197
GSD Optional – Primary	0.195
GSD Optional – Subtransmission	0.193
LS-1, LS-2	0.514

**Cost Recovery Factors**

<b><u>Rate Schedule</u></b>	<b><u>(dollars per kW)</u></b>
GSD – Secondary	0.84
GSD – Primary	0.83
GSD – Subtransmission	0.82
SBF – Secondary	0.84
SBF – Primary	0.83
SBF – Subtransmission	0.82
IS - Primary	0.11
IS - Subtransmission	0.11

The January 2022 through December 2022 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**

<b><u>Rate Schedule</u></b>	<b><u>(cents per kWh)</u></b>
RS	0.310
GS and CS	0.249
GSD Optional – Secondary	0.190
GSD Optional – Primary	0.188
GSD Optional – Subtransmission	0.186
LS-1, LS-2	0.229

**Cost Recovery Factors**

<b><u>Rate Schedule</u></b>	<b><u>(dollars per kW)</u></b>
GSD – Secondary	0.80
GSD – Primary	0.79
GSD – Subtransmission	0.78

SBD – Secondary	0.80
SBD – Primary	0.79
SBD – Subtransmission	0.78
GSLD - Primary	0.69
GSLD - Subtransmission	0.05
(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, 2022. (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. 20210010-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. COMPLIANCE WITH ORDER NO. PSC-2020-0224-AS-EI**

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

DATED this 15<sup>th</sup> day of July 2021.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Revised Prehearing Statement, filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 15<sup>th</sup> day of July 2021 to the following:

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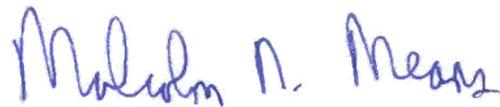
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