FILED 7/26/2024
DOCUMENT NO. 07866-2024
FPSC - COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase by Tampa Electric Company	DOCKET NO. 20240026-EI
In re: Petition for approval of 2023 Depreciation and Dismantlement Study, by Tampa Electric Company	DOCKET NO. 20230139-EI
In re: Petition to implement 2024 Generation Base Rate Adjustment provisions in Paragraph 4 of the 2021 Stipulation and Settlement Agreement, by Tampa Electric Company	DOCKET NO. 20230090-EI FILED: July 26, 2024

TAMPA ELECTRIC COMPANY'S NOTICE OF FILING THE REDACTED DIRECT TESTIMONY AND EXHIBITS OF BION OSTRANDER

Tampa Electric Company ("Tampa Electric" or the "company") hereby files this Notice of Filing the redacted Direct Testimony and Exhibits (BCO-1, BCO-2, and BCO-3) of Bion Ostrander (the "Ostrander Testimony"), witness of the Office of Public Counsel ("OPC").

On June 6, 2024, the OPC submitted a confidential version of the Ostrander Testimony.[1] The company conducted a confidentiality review and identified certain information within Exhibit BCO-3 that contains proprietary confidential business information. On June 11, 2024, the company filed a Request for Confidential Classification for this information.[2] The nonconfidential Ostrander Testimony contains redactions pursuant to the pending Request for Confidential Classification. The company also deleted or removed erroneous "CONFIDENTIAL" designations and highlighting within the testimony and exhibits[3].

DATED this 26th day of July 2024.

---

[1] *See* DN 04696-2024 filed on June 6, 2024, in Docket No. 20240026-EI.
[2] *See* DN 05228-2024 filed on June 11, 2024, in Docket No. 20240026-EI.
[3] The company notes that some erroneous yellow highlighting remains in portions of the exhibits as the company lacked access to the original file to remove such highlighting.

Respectfully submitted,

J. JEFFRY WAHLEN
jwahlen@ausley.com
MALCOLM N. MEANS
mmeans@ausley.com
VIRGINIA L. PONDER
vponder@ausley.com
Ausley McMullen
Post Office Box 391
Tallahassee, Florida 32302
ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of the foregoing Notice have been served by posting on a shared document site, hand delivery of a USB drive or by electronic mail on this 26th day of July, 2024 to the following:

Adria Harper
Carlos Marquez
Timothy Sparks
Daniel Dose
Florida Public Service Commission/OGC
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
aharper@psc.state.fl.us
cmarquez@psc.state.fl.us
tsparks@psc.state.fl.us
ddose@psc.state.fl.us
discovery-gcl@psc.state.fl.us

Walt Trierweiler
Patricia Christensen
Octavio Simoes-Ponce
Charles Rehwinkel
Mary Wessling
Austin Watrous
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
trierweiler.walt@leg.state.fl.us
christensen.patty@leg.state.fl.us
ponce.octavio@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
wessling.mary@leg.state.fl.us
watrous.austin@leg.state.fl.us

Bradley Marshall
Jordan Luebkemann
Earthjustice
111 S. Martin Luther King Jr. Blvd.
Tallahassee, FL 32301
bmarshall@earthjustice.org
jluebkemann@earthjustice.org

Jon Moyle
Karen Putnal
c/o Moyle Law Firm
118 N. Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com
mqualls@moylelaw.com

Leslie R. Newton, Maj. USAF
Ashley N. George, Capt. USAF
AFLOA/JAOE-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
Leslie.Newton.1@us.af.mil
Ashley.George.4@us.af.mil

Thomas A. Jernigan
AFCEC/JA-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
thomas.jernigan.3@us.af.mil

Ebony M. Payton
AFCEC-CN-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
Ebony.Payton.ctr@us.af.mil

Robert Scheffel Wright
John LaVia, III
Gardner, Bist, Wiener, Wadsworth, Bowden,
Bush, Dee, LaVia & Wright, P.A.
1300 Thomaswood Drive
Tallahassee, FL 32308
shef@gbwlegal.com
jlavia@gbwlegal.com

Nihal Shrinath
2101 Webster Street, Suite 1300
Oakland, CA 94612
nihal.shrinath@sierraclub.org

Floyd R. Self
Ruth Vafek
Berger Singerman, LLP
313 North Monroe Street, Suite 301
Tallahassee, FL 32301
fself@bergersingerman.com
rvafek@bergersingerman.com

Sari Amiel
Sierra Club
50 F. Street NW, Eighth Floor
Washington, DC 20001
sari.amiel@sierraclub.org

Hema Lochan
Earthjustice
48 Wall St., 15th Fl
New York, NY 10005
hlochan@earthjustice.org
flcaseupdates@earthjustice.org

ATTORNEY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase by Tampa Electric Company
____/

Docket No. 20240026-EI

Filed: June 6, 2024

DIRECT TESTIMONY

OF

BION C. OSTRANDER

ON BEHALF

OF

THE CITIZENS OF THE STATE OF FLORIDA

Walt Trierweiler
Public Counsel

Patty Christensen
Associate Public Counsel

Octavio Ponce
Associate Public Counsel

Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
(850) 488-9330

Attorneys for the Citizens
Of the State of Florida

TABLE OF CONTENTS

DIRECT TESTIMONY

OF

BION C. OSTRANDER

On Behalf of the Citizens of the State of Florida

Before the

Florida Public Service Commission

Docket No. 20240026-EI

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS.

A. My name is Bion C. Ostrander. I am an independent regulatory consultant and President of Ostrander Consulting with a business address of 1121 S.W. Chetopa Trail, Topeka, Kansas 66615.

Q. PLEASE DESCRIBE OSTRANDER CONSULTING.

A. Ostrander Consulting performs regulatory consulting work primarily for U.S. and international state regulatory agencies and governmental entities, and have operated for thirty-three years since 1990. I have forty-four years of combined regulatory, CPA firm, and accounting experience and have extensive experience in the utility regulatory field as an expert witness in over 300 regulatory proceedings, including electric, gas, renewable energy, water/sewer, telephone utilities and other special projects.

Q. HAVE YOU PREPARED AN EXHIBIT WHICH DESCRIBES YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE?

A. Yes. I have attached Exhibit BCO-1, which is a summary of my background, experience and qualifications.

Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE FLORIDA PUBLIC COMMISSION AS AN EXPERT WITNESS?

A. Yes. I provided testimony before the Florida Public Service Commission ("Commission" or "FPSC") on behalf of the Office of Public Counsel in Docket No. 030867-TI, regarding telecommunications access charge matters.

Q. BY WHOM WERE YOU RETAINED, AND WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. I was retained by the Florida Office of Public Counsel ("OPC") to review the impact of affiliate transactions and the spin-off of Peoples Gas System, Inc. ("PGS") upon the revenue requirements of Tampa Electric Company, Inc. ("TECO") in this rate case, along with proposing any necessary adjustments.

Q. ARE OTHER OPC WITNESSES INCORPORATING YOUR PROPOSED REVENUE REQUIREMENT ADJUSTMENTS?

A. Yes. OPC witness Mr. Lane Kollen will incorporate the impacts of my adjustments in his final revenue requirement recommendation.

II. SUMMARY OF TESTIMONY

Q. PLEASE SUMMARIZE YOUR TESTIMONY AND RECOMMENDATIONS.

A. Affiliate transactions require greater scrutiny due to the inherent influential nature of these transactions from both a financial and policy perspective. Although much of the transactions are not *per se* unreasonable, it is always the utility's burden to prove its requested costs are reasonable. To ensure that affiliate transactions are properly accounted for so that potential utility nonregulated costs (allocated from parent company or other nonregulated affiliates) are not subsidized by regulated-utility ratepayers, my review consists of a comprehensive evaluation of affiliate costs charged to and from TECO and various affiliated companies. I have reviewed or attempted to review all cost allocation manuals, all shared asset and services agreement, if any, among and between affiliate companies, the inputs utilized to derive its Modified Massachusetts Method ("MMM") for allocation, and other statistical inputs and drivers used for allocation purposes. Based on this comprehensive review, I have identified areas where TECO has failed to provide supporting documentation for various types of allocated costs and where certain allocation factors warrant adjustments.

Q. PLEASE SUMMARIZE THE ADJUSTMENTS YOU ARE RECOMMENDING.

A. I am recommending the following adjustments in the body of my testimony, as well as the rationale for the adjustments.

1) I am recommending an expense reduction of $858,561 to reflect a decrease in corporate support allocations from Emera to TECO related to expenses of a dissolved affiliate that were proposed to be transferred to TECO.

2) I am recommending an expense reduction of $5,457,472 to reflect a decrease in shared service allocations from Tampa Electric to TECO related to: a) revising allocation factors for various shared services; and 2) disallowing one-half of significant unsupported corporate overhead costs.

Q. CAN YOU PROVIDE AN OVERVIEW OF YOUR PROCESS FOR REVIEWING AFFILIATE TRANSACTIONS IN GENERAL AND IN THIS CASE?

A. Yes, I can. Affiliate transactions are difficult, complex, and time consuming to review. The review of affiliate transactions also requires timely, complete, and organized responses from the utility, especially in the relatively compressed time period for filing Intervenor testimony in this case. I have concerns with the timelines and quality of responses from TECO, but I do not want that to be the focus of my testimony. However, substantial cooperation from the utility is necessary in order to isolate significant issues of concern regarding costs that may not have much immediate or easily obtained supporting documentation because the amounts are allocated (or direct assigned) from the parent company or another affiliate.

It is possible to review the reasonableness of the allocation methods and factors (and inputs to those methods) to some degree, and to quantify concerns in related adjustments, and I have performed this task as part of my $6.30 million total adjustment to affiliate transactions.

However, the two most difficult issues to address and quantify are regarding affiliate transactions and the allocation of corporate overhead/indirect allocation costs to the regulated utility from a parent company and from a centralized service company. In the instant case, Tampa Electric/TECO acts as a *de facto* centralized service provider, which complicates the evaluation of its allocations to the regulated operations of TECO. The evaluation of affiliate transactions raises the following concerns:

1) Are there duplicative unsupported overhead/indirect costs; and
2) Whether costs are reflected at the lower of cost or market value for allocations from affiliates to TECO

First, when I refer to the issue of "duplicative" costs, I am concerned that a parent company or the regulated utility may intentionally or unintentionally allocate/assign primarily indirect/overhead-type costs to the regulated utility. For example, at both the corporate level and regulated utility level, certain employees may provide various services related to human resources, financial/accounting, legal, procurement, or overall administrative services (officers/executives providing oversight at both levels).

However, it is difficult to determine if some portion of these types of service costs are necessary and duplicative of each other and if they are directly (or even indirectly) related to and provide benefits to the regulated utility operations. For example, in most cases, almost all corporate level costs are allocated down to regulated and unregulated operations, but there is a concern whether some of these high-level costs are truly beneficial to the regulated utility or just merely supporting and promoting the broad corporate structure.

It is extremely difficult to determine the optimal or most efficient production of services and level of employees to provide these services at both the corporate and regulated utility level. It is almost impossible to specifically determine what each employee, or even each department, is doing that is directly or even indirectly beneficial to the regulated utility, and if the costs should be allocated to the regulated utility (and even to unregulated affiliates) – unless a very detailed and time consuming evaluation is performed (and even that would require complete cooperation from the company).

However, when broad, undefined, and aggregated significant buckets of costs are allocated to the regulated utility, this raises concerns about "duplicate" or more generic unsupported costs. For example, in this case Tampa Electric allocated to TECO a category of expenses cited as "Corporate Responsibility" consisting of total 2025 Budget[1] expenses of $10.60 million, of which $7.60 million is allocated to TECO (15% of the total $51.80M expenses allocated from Tampa Electric to TECO). I have disallowed one-half of the $7.60 million of expenses due to the absence of underlying supporting documentation and calculations for this broad level of expenses.

Second, I am concerned that costs allocated/assigned to TECO from the parent or Tampa Electric be reflected at the lower of cost or market (or fair market value). I am aware that technically, Florida rules do not require that parent company or centralized service company allocations to TECO be at the lower of cost or market. However, when I use the term "lower of cost or market" I am using this term in more of a common sense application, such that no entity should be allowed to allocate/assign costs to TECO (or any affiliate) that are unreasonable, excessive, and duplicative. Also, these costs should be in line with the market and be competitively priced, although

[1] The "2025 Budget" costs are the costs included in this rate case by TECO for determination of the revenue requirement to support the proposed rate increase.

market value is difficult to determine for a specific service/department without a very complex and time consuming analysis. Also, when I refer to services being provided at some reasonable level of "cost," I am not asserting or implying that the parent company or TECO deliberately mark-up (or include an additive fee) labor or other service costs allocated/assigned to TECO. My concern is that "cost" should not be excessive and should not include the costs of more employees (and related overhead costs) than what is necessary to provide that centralized or shared service, and this returns to my concern with duplicative costs.

As an example, in 2023, affiliate PGS took back some Procurement services in-house, and stopped taking some portion of these services allocated to them from centralized service provider Tampa Electric/TECO. It is possible that PGS made a competitive-market decision, and determined that the centralized service provider's cost of this Procurement service was excessive or exceeded fair market (or fair value). However, TECO now essentially pays for almost all of the Procurement costs[2] provided by centralized service provider, TECO. This is not fair or reasonable, and is a negative fall-out of monopoly practices and being a captive customer to the centralized service provider that is also the primary regulated utility in this rate case. These and other related affiliate transaction concerns are addressed in my direct testimony.

<u>III. EXPLANATION OF CORPORATE STRUCTURE</u>

Q. PLEASE DESCRIBE THE TECO AND EMERA, INC. ("EMERA" OR "PARENT COMPANY") CORPORATE STRUCTURE.

[2] Also, these Procurement costs are increasing at an alarming level.

A. TECO is a public utility operating within the state of Florida, it is comprised of an electric division, referred to as Tampa Electric. Most of my testimony refers to TECO, although I may also refer to TECO and/or the electric division of Tampa Electric when addressing the allocation of costs from Tampa Electric to TECO and other affiliates. Sometimes my testimony will use TECO and Tampa Electric interchangeably, and I do not intend any important distinction in these instances. All of TECO's common stock is owned by TECO Energy, Inc., a holding company, that is also an indirect, wholly owned subsidiary of Emera.

TECO previously included a natural gas division, but on January 1, 2023, TECO transferred the assets and liabilities of the gas division into a separate corporation called PGS, which is a wholly owned subsidiary of a newly formed gas operations holding company, TECO Gas Operations, Inc., a wholly owned subsidiary of TECO Energy, Inc.

Emera, Inc.[3] is based in Halifax, Nova Scotia, and owns and operates cost-of-service rate regulated electric and gas utilities in Canada, the United States ("U.S."), and the Caribbean consisting of the following:[4]

1) Nova Scotia Power Inc. ("NSP");
2) TECO;
3) PGS;
4) New Mexico Gas Company, Inc. ("NMG");
5) Emera Brunswick Pipeline Company Limited ("Brunswick Pipeline");

[3] Emera also owns equity investments in NSP Maritime Link Inc. ("NSPML"), Labrador Island Link Limited Partnership ("LIL"), Maritimes & Northeast Pipeline Limited Partnership and Maritimes & Northeast Pipeline, LLC ("M&NP"), and St. Lucia Electric Services Limited ("Lucelec").
[4] Emera 2023 Annual Report, p. 10.

6) Barbados Light & Power Company Limited ("BLP"); and

7) Grand Bahama Power Company Limited ("GBP").

In addition to the entities listed above, there are about 238 other Emera affiliates as of 2022, too numerous to list.[5]

A high level Corporate Structure organization chart for 2023 is included in this rate proceeding at TECO's Schedule No. C-31, page 22 of 35. A more detailed Corporate Structure chart (by detailed affiliates) with 13 pages has also been provided by TECO.[6]

IV. EXPLANATION OF COST ALLOCATION MANUALS ("CAM") AND ALLOCATION PROCESS

Q. PLEASE EXPLAIN THE VARIOUS CAMs.

A. There are three different CAMs that have some application to this proceeding:

1) November 20, 2023, NSP CAM – TECO states this CAM should be relied upon regarding allocations from Emera to TECO (and affiliates);

2) January 1, 2020, TECO Energy, Inc. CAM – this CAM addresses allocations from TECO to affiliates (through the period ending December 31, 2023); and

3) January 1, 2024, TECO Holdings, inc. CAM – this CAM replaces the January 1, 2020, TECO Energy, Inc. CAM.

There are two primary changes that took place with the new TECO Holdings, inc. CAM effective January 1, 2024, replacing the prior TECO Energy, Inc. CAM of

[5] Nova Scotia Utility and Review Board, NS Power Affiliate Code of Conduct, 2022 Report, April 27, 2023, Redacted, Appendix A, pp. 2-52 (provided in TECO's response to OPC's Second Request for Production of Documents ("POD"), No. 44).
[6] TECO's response to OPC's First Set of POD No. 22, Bates Stamp ("BS") pages 11041 to 11054.

January 1, 2020. First, effective April 1, 2024, TECO Energy, Inc. ceased to exist and was replaced by TECO Holdings, inc. TECO Holdings, inc. now operates the companies consisting of the prior TECO Energy, Inc. entities of TECO, PGS, NMG, plus SeaCoast.[7]

Second, effective January 1, 2023, TECO transferred the assets and liabilities of its PGS division into a separate corporation called PGS. This did not impact the allocations process, TECO continues to allocate expenses to the new PGS corporation as it did to the prior PGS division,[8] generally using the same allocation methods. Other than the January 1, 2024, TECO Holdings, inc. CAM replacing the January 1, 2020, TECO Energy, Inc. CAM, the corporate structure and provision of centralized services by Tampa Electric/TECO to affiliates remains about the same. The Federal Energy Regulatory Commission ("FERC") waiver (effective January 1, 2020 and discussed below), is still operative and the January 1, 2024, TECO Holdings, inc. CAM has been used by TECO for determining the 2024/2025 budgeted affiliate expenses in the revenue requirement of this proceeding.

TECO states the November 30, 2023, NSP CAM should be relied upon regarding Corporate Support Services and Management and Administrative Services expenses (and other expenses) allocated from Emera to TECO (and other affiliates of previous TECO Energy, Inc. and current TECO Holdings, inc.) for this proceeding.[9] I do have some concerns with relying on the NSP CAM as a surrogate for allocations from Emera to TECO (and U.S. affiliates) in this proceeding.

[7] TECO Holding, inc. operates within the Emera US Holdings Inc. group of Emera companies.
[8] Although PGS has taken some shared services back from TECO and performs these services in-house instead of receiving an allocation of these costs from TECO.
[9] Provided by TECO to OPC via an April 10, 2024 email.

Q. PLEASE EXPLAIN YOUR CONCERNS REGARDING THE USE OF THE NSP CAM AS A SURROGATE FOR AN EMERA CAM IN THIS PROCEEDING.

A. First, I have reservations about using the NSP CAM as the guide (or surrogate guide) for allocations from Emera to TECO (and other U.S. affiliates) in this proceeding, when the NSP CAM is not specifically named or mentioned as an Emera CAM. Technically, the NSP CAM describes the types of Corporate Support and Management and Administrative Service expenses and methods used to allocate and direct assign expenses from the largest Canadian affiliate, NSP, to other affiliates,[10] but it does not specifically address the allocation or direct assignment of service expenses from Emera to TECO and other U.S. affiliates. In fact, the NSP CAM does not even mention or refer to parent company Emera (other than being included at the list of "Affiliates" at Section 2.0).

Second, a TECO-prepared workpaper that was intended to reconcile the 2023 FERC Form 1 affiliate diversification data identifies: 1) $11.10 million of Emera "Corporate Support Services" charged to TECO; and 2) this same workpaper identifies ($4.10 million) of Emera Energy Services, Inc. "Asset Management Agreement" services treated as a debit to Accounts Receivable on TECO's books (although not booked to an expense account).[11]

---

[10] Although the NSP CAM may also be relied upon by NSP or Emera to describe the Corporate Support and M&A service expenses and methods used to allocate and direct assign expenses from Emera to NSP, the CAM does not specifically mention that it is a guide for Emera allocating and direct assigning expenses from Emera to NSP or TECO.

[11] This information is provided at TECO's response to OPC's Fifth Set of Interrogatories and PODs, Interrogatory No. 98 and POD No. 74, and Excel schedule POD 74 titled "OPC_Affiliate_Purchases by FERC." This information was originally provided by TECO in response to OPC's Second Set of Interrogatories and PODs, Interrogatory No. 61 and POD No. 37, and Excel spreadsheet at POD 37 and was intended to reconcile TECO's FERC Form 1 affiliate diversification data.

However, TECO has not provided an Emera Corporate Support Services agreement (to the extent a separate agreement exists) or related documentation and calculations supporting the direct expenses of $7.18 million that are included in the $11.10 million of Emera charges to TECO. Also, TECO has not provided the supporting documentation for the Emera Energy Services, Inc.'s Asset Management Agreement. Thus, I would recommend the following in this regard:

1) First, a new specific and updated "Emera CAM" should be created that explains and governs specific affiliate transactions, including allocated and direct-assigned expenses from Emera to TECO and all other affiliates;
2) Second, the updated Emera CAM should identify all Corporate Support Services and Management and Administrative Services to be allocated and direct assigned from Emera to TECO and all other affiliates, and specific copies of all agreements (such as a Corporate Support Service agreements and Management and Administrative Services agreement) should be attached to the Emera CAM as exhibits or appendices; and
3) Third, the updated Emera CAM should identify all Asset Management Agreement services to be allocated and direct assigned from Emera Energy Services, Inc. to TECO and all other affiliates, and specific copies of all agreements (such as the Asset Management Agreement) should be attached to the Emera CAM as exhibits or appendixes. Examples of supporting documentation and calculations for these expenses should be included in the Emera CAM.

The above concerns will also be addressed in the adjustments section of my testimony.

Additionally, the details of the January 1, 2020, TECO Energy, Inc. CAM and the subsequent January 1, 2024, TECO Holdings, inc. CAM will be addressed in more detail in the following questions that address allocation processes.

Q. PLEASE IDENTIFY THE AFFILIATES THAT ALLOCATE OR ASSIGN EXPENSES TO TECO IN 2023.

A. I have summarized those primary affiliate expense charges to TECO in 2023 (excluding gas purchases).[12] The expenses charged from affiliates to TECO are: a) direct assigned; and b) indirect allocated/assessed which are relevant to my review in this rate case because some of these amounts are "affiliate" transactions subject to my review.

1) **<u>Emera</u>** - Emera charged certain direct and allocated corporate support service expenses to TECO in 2023 of $14.50 million, and this includes $11.10 million of direct/allocated Corporate Support Services and $3.70 million of labor.[13]

2) **<u>Emera Energy Services, Inc</u>**. – Emera Energy Services, Inc. appears to charge TECO for certain services under its Asset Management Agreement,[14] but TECO has not provided supporting documentation and detailed calculations for these charges. However, it appears TECO has only disclosed the "net impact" of transactions with Emera Energy Services, Inc. which is a $4.10 million net TECO charge (via an Accounts Receivable entry) to Emera Energy Services, Inc. in 2023 (and a 2024/2025 Budget amount of $4.40 million). However, this net charge from TECO to Emera Energy Services, Inc. of $4.10 million is

---

[12] I did not review "gas purchase" affiliate transactions, my review focused on operating expenses and corporate overhead/common expenses allocated or direct assigned from affiliates to TECO.

[13] The $11.10 Million of Corporate Support Services charged to TECO includes $7.11 Million of direct-assigned services, $3.04 Million of allocated services, $.89 Million of allocated TECO Services, Inc. charges (assigned to TECO), and $.07 Million of miscellaneous. This information is from TECO's response to OPC's Tenth Set of Interrogatories (some Interrogatories are Confidential) and Eleventh Set of PODs, Confidential response to Interrogatory No.179 and POD No. 138. POD No. 138, Excel spreadsheet "(BS 30600) OPC Summary – POD 138.xlsx" is not Confidential. This Excel spreadsheet shows a reconciliation from Emera amounts allocated to TECO that are in Canadian currency at TECO's response to OPC's Second Set of Interrogatories and PODs, Interrogatory No. 61 and POD No. 37, Excel spreadsheet titled, "Confidential (BS 16846) Emera Affiliate Allocations – Annual Summary 2023_Highlighted.xlsx." The high level total amounts allocated to TECO are not considered to be Confidential because these amounts are disclosed in other Interrogatories and PODs, the detailed allocated amounts by Function and for other affiliates is considered to be Confidential.

[14] A summary description of the Asset Management Agreement indicates that Emera Energy Services, Inc. provides services to TECO such as Facility Management, Telecommunications, Environmental, Regulatory, Customer Service, Fuels, Government Community Affairs, Engineering, O&M Safety Training, and Other.

confusing, because it does not disclose possible underlying transactions regarding charges from Emera Energy Services, Inc. to TECO under the Asset Management Agreement. This concern will be addressed later in more detail.

3) **<u>TECO</u>** - Tampa Electric incurred $96.20 million of allocated and direct assigned expenses on its books for 2023 ($72.80 million of allocated expenses and $23.40 million of direct assigned expenses). Tampa Electric/TECO treated these expenses in the following manner: a) Tampa Electric allocated $22.20 million of the total $72.80 million of allocable expenses to affiliates and $50.60 million was retained on TECO books; and b) Tampa Electric direct assigned $5.80 million of the total $23.40 million of direct-assigned expenses to affiliates and retained $17.60 million on TECO books.[15] I have treated the $50.60 million of "allocated" expenses retained on TECO's books as being subject to my affiliate transaction review, because the total allocable expenses of $72.80 million were subject to allocation between TECO and affiliates using the MMM factor and other statistical allocation factors (headcount, claims, etc.).[16]

4) **<u>PGS</u>** - PGS charged $2.30 million of other labor expense (and a small amount of miscellaneous property sublease expense) to TECO.

5) **<u>NMG</u> -** NMG charged $.20 million of information technology expenses (and a small amount of labor) to TECO.

6) **<u>Other Affiliates</u>** - A combination of other affiliates charged $.10 million of labor to TECO.

7) **<u>TECO Partners, Inc.</u> –** TECO Partners, Inc. charged an immaterial amount of labor to TECO.

Q. PLEASE DESCRIBE HOW THE CAMS ALLOCATE OR DIRECT ASSIGN EXPENSES AMONG AFFILIATES.

A. Both the January 1, 2020, TECO Energy, Inc., CAM (effective through 2023) and January 1, 2024, TECO Holdings, inc., CAM describe the same process for either the allocation or direct assignment of expenses to TECO and affiliates.[17] Tampa

[15] I am not reviewing TECO's $17.60 Million share of the total direct assigned expenses of $23.40 Million because these types of direct expenses will be subject to the review by OPC witness Mr. Kollen in this rate case.
[16] These amounts are from TECO's response to OPC's Sixth Set of Interrogatories and PODs, Interrogatory No. 103 and POD No. 81, per Excel spreadsheet "(BS 15597) Shared Services Schedule 2023.xlsx."
[17] Both the January 1, 2020, TECO Energy, Inc. CAM and the January 1, 2024, TECO Holdings, inc. CAM were provided at TECO's response to OPC's First Set of Interrogatories and POD, Interrogatory No. 58 and POD No.

Electric/TECO assigns costs in the following order: 1) direct costs charged to a specific affiliate; 2) indirect costs for Shared Services allocated/assessed to more than one affiliate using statistical cost drivers or allocation factors (i.e., number of employees/headcount, number of claims, etc.); and 3) the remaining indirect costs for Corporate Services are allocated to more than one affiliate using the MMM.

TECO sometimes interchangeably uses the terminology of "allocation" or "assessment" when addressing costs that are not direct assigned, but are instead allocated/assessed using either the MMM or some other statistical cost driver or allocation factor. However, my testimony will most often use the terminology of "allocated" to describe costs charged to TECO from other affiliates (or charged by Tampa Electric/TECO to other affiliates) that are subject to some type of allocation factor or statistical cost driver and which are not direct assigned.

I do not disagree with the CAM-described method and approach regarding the following: 1) allocation of indirect expenses to affiliates that use these common services or Corporate/TECO overheads; and 2) assigning direct expenses to specific affiliates which caused those costs to be incurred (although I believe that all expenses should be direct assigned whenever possible). However, I do not agree with all specific allocation factor inputs used in the MMM or with other statistical inputs/drivers for other allocation factors. Later in my testimony, I will address my recommended adjustments to the MMM and statistical inputs/drivers.

---

34. This Q and A includes information from the January 1, 2020 TECO Energy, Inc. CAM, page 3 and the January 1, 2024, TECO Holdings, inc. CAM, pp. 3-4.

V. TECO CENTRALIZED SERVICES AND FERC WAIVER

Q. PLEASE EXPLAIN THE SHIFT OF CENTRALIZED SERVICE PROVIDER FROM TECO SERVICES, INC. TO TECO, AND EXPLAIN HOW THIS IS TIED TO TECO'S REQUESTED WAIVER OF CERTAIN FERC AFFILIATE TRANSACTION RULES.

A. The following explanations for changes in the corporate structure and the provision of centralized services are from: a) the January 1, 2020, TECO Energy, Inc. CAM (describing the structure from Emera's acquisition of TECO on July 1, 2016, through December 31, 2023); and b) the current January 1, 2024, TECO Holdings, inc., CAM describing the current structure effective January 1, 2024.[18] The following describes the transition from TECO Services, Inc. to TECO as a surrogate centralized service company, providing shared and corporate services for certain U.S. regulated public utilities and some other unregulated affiliates.[19] This transition to TECO as a centralized service company did not impact allocations from Emera and Emera Energy Services, Inc. to TECO and other foreign and U.S. regulated and unregulated affiliates.

---

[18] Both the January 1, 2020, TECO Energy, Inc. CAM and the January 1, 2024, TECO Holdings, Inc. CAM were provided with TECO's response to OPC's First Set of Interrogatories and POD, Interrogatory No. 58 and POD No. 34. The specific CAMs were included within the September 14, 2023, NMG Direct Testimony and Exhibits of Kevin I. Farr in Case No. 23-00255-UT before the New Mexico Public Regulation Commission, *In the Matter of the Application* of New Mexico Gas Company, Inc. for Approval of Revisions to its Rates, Rules, and Charges Pursuant to Advice Notice No. 96. The January 1, 2022, TECO Energy, Inc. CAM is located at BS 16774 – 16797 and the January 1, 2024, TECO Holdings, Inc. CAM is located at BS 16798 – 16819. This Q and A includes information from the January 1, 2020 TECO Energy, Inc. CAM, pp. 1-2 and the January 1, 2024, TECO Holdings, Inc. CAM, pp. 1-2.

[19] Per the TECO Holdings, inc. CAM effective January 1, 2024, Exhibit B shows that TECO currently provides shared services to the regulated utilities and other unregulated utilities of: TECO, PGS, NMG, TECO Energy Services, Inc., TECO Energy, TECO Pipeline Holding Company, LLC, TECO Partners, Inc., TECO Gemstone, Inc., TECO Properties Corp., TECO Energy Source, Inc., TECO Finance, Inc., SeaCoast, and TECO Holdings, inc.

Emera acquired TECO Energy, Inc.[20] in July 1, 2016, and since that time Emera has allocated Corporate Support Services expense and labor expense to TECO (and other affiliates) via an intermediary centralized service company called TECO Services, Inc. along with other expenses that are direct assigned from Emera to TECO. In addition, Emera Energy Services, Inc.[21] provides certain services to TECO via an Asset Management Agreement.[22]

Since January 2014 (prior to the Emera acquisition of TECO), TECO Energy, Inc. had been providing service functions to its operating companies and other affiliates via a centralized service company TECO Services, Inc.[23] (owned by TECO Holdings, inc.).[24]

On July 13, 2019,[25] TECO filed a waiver request with the FERC stating that effective January 1, 2020, TECO Services, Inc. would cease operations as a centralized service company allocating and assigning expenses to TECO Energy, Inc. affiliates[26] and TECO would begin providing these same centralized services to the same affiliates. Although TECO does not formally refer to itself as a centralized service company, I believe that TECO is essentially a "surrogate" (or *de facto*) centralized service

[20] At the time of Emera's acquisition, TECO Energy, Inc. consisted of the operating companies of TECO, PGS, NMG, and TECO Pipeline Holding Company, LLC.
[21] Emera Energy Services, Inc. is a direct affiliate of Emera.
[22] My testimony will address concerns regarding transactions between TECO and Emera Energy Services, Inc., including TECO's failure to provide supporting documentation and failure to show related expenses charged to TECO.
[23] In addition, TECO Services, Inc. has been providing services to the affiliates of TECO Holdings, Inc., TECO, PGS, NMG, TECO Pipeline Holding Company, LLC, TECO Partners, Inc, TECO Gemstone, Inc., TECO Properties Corp., TECO Energy Source, Inc., and TECO Finance, Inc.
[24] These centralized service functions include executive oversight, finance, corporate planning, corporate development, legal, human resources, procurement, and government affairs.
[25] TECO's waiver request was supplemented on September 18, 2019.
[26] TECO Services, Inc. ceased providing centralized service functions on December 31, 2019, although periodically, TECO Services, Inc. could provide services to other Emera or TECO Energy, Inc. affiliates and direct charge those services to affiliates.

company in all material respects because it performs all of the same services and allocates all of the same types of expenses to the same affiliates as TECO Services, Inc. (the prior centralized service company). My testimony will subsequently address additional concerns regarding this matter.

Since TECO began providing centralized service functions to affiliates on January 1, 2020, TECO desired a corresponding FERC waiver of two affiliate transaction sections, FERC 18 C.F.R. § 35.44(b)(1) and § 35.39(e)(1) by this same date. The FERC granted TECO's waiver request on October 30, 2019, for implementation at January 1, 2020.[27] FERC approved this waiver without a specific CAM in place for Emera.

The two FERC affiliate transaction sections requested for waiver are summarized below:

1) **<u>18 C.F.R. § 35.44(b)(1)</u>**:

> **(b) Non-power goods or services.**
>
> (1) Unless otherwise permitted by Commission rule or order, and except as permitted by paragraph (b)(4) of this section, sales of any non-power goods or services by a franchised public utility that has captive customers or that owns or provides transmission service over jurisdictional transmission facilities, including sales made to or through its affiliated exempt wholesale generator or qualifying facilities, to a market-regulated power sales affiliate or <u>non-utility affiliate</u> must be at the higher of cost or market price.

2) **<u>18 C.F.R. § 35.39(e)(1)</u>**:

> **(e) Non-power goods or services.**

~~[27] FERC waiver, 169 FERC ¶61,081, United States of America Federal Energy Regulatory Commission, Docket No. ER19-2439-000, Order on Request for Waiver of Affiliate Pricing Rules, issued October 30, 2019 ("FCC Waiver").~~

[27] FERC waiver, 169 FERC ¶61,081, United States of America Federal Energy Regulatory Commission, Docket No. ER19-2439-000, Order on Request for Waiver of Affiliate Pricing Rules, issued October 30, 2019, pp. 2-3. ("FERC Waiver").

> **(1)** Unless otherwise permitted by Commission rule or order, sales of any non-power goods or services by a franchised public utility with captive customers, to a market-regulated power sales affiliate must be at the higher of cost or market price.

Essentially, FERC 18 C.F.R. § 35.44(b)(1) and § 35.39(e)(1) affiliate transaction sections state that a regulated public utility's (such as TECO) sale of non-power goods and services to market-regulated power sales affiliates (and unregulated non-utility affiliates) must be at the "higher of cost or market price." TECO sought to waive these two FERC affiliate transaction sections so that TECO would be able to provide non-power goods and services to market-regulated power sales affiliates (and/or non-utility affiliates) at "cost," instead of at the "higher of cost or market."

I am not concerned that TECO received a FERC waiver for section 35.39(e)(1) or for most of section 35.44(b)(1) - so that TECO can sell non-power goods or services to a "market-regulated power sales affiliate" at cost. However, I do have some concern that TECO received a complete FERC waiver to 35.44(b)(1), and specifically the language near the end which states that any sales of non-power goods or services by regulated public utility to a "non-utility affiliate" must be at the higher of cost or market price. This means that TECO can sell non-power goods and services to any <u>unregulated non-utility</u> affiliate at cost, instead of the higher of cost or market price. This means that TECO is foregoing the receipt of greater revenues from an unregulated, non-utility affiliate when it provides goods and services at a cost that is below market price, because TECO should be receiving greater revenues reflected at the market price (the higher of cost or market). Also, and most importantly, this means that TECO could be providing a subsidy to a non-utility affiliate.

VI. AFFILIATE TRANSACTION POLICY AND RULES

Q. PRIOR TO ADDRESSING THE STATE AFFILIATE TRANSACTION RULES, CAN YOU EXPLAIN THE IMPORTANCE OF THE FERC AFFILIATE TRANSACTION RULES (AND AFFILIATE TRANSACTION RULES IN GENERAL)?

A. In its simplest form, the primary purpose of the FERC's affiliate transaction rules in 18 C.F.R. § 35.39 (Affiliate restrictions), § 35.43 (Generally), and § 35.44 (Protections against affiliate cross-subsidization) are to protect against a regulated utility unfairly subsidizing its unregulated affiliates.[28] The rules conservatively require that: 1) all sales of goods and services from an unregulated affiliate to a regulated utility are provided at the <u>lower</u> of cost or market price; and 2) all sales of goods and services from a regulated utility to an unregulated affiliate are provided at the higher of cost or market price.

Affiliate transaction rules generally require an unregulated affiliate to sell goods and services to a regulated utility affiliate at the lower of cost or market price, to conservatively ensure that the regulated utility affiliate is not paying excessive prices that will result in subsidizing the unregulated affiliate to the detriment of the regulated utility affiliate (or to the detriment of market competition). Similarly, affiliate transaction rules generally require a regulated utility affiliate to sell goods and services to an unregulated affiliate at the higher of cost or market price, to similarly ensure that the regulated utility affiliate is receiving fair value that will not result in it subsidizing

[28] These unregulated affiliates include the unregulated holding company, unregulated service company, and other unregulated affiliates providing non-tariffed services and products.

the unregulated affiliate to the detriment of the regulated utility affiliate (or to the detriment of market competition).

In a worst case scenario, if the unregulated affiliate charges excessive prices for goods and services to the regulated utility, then the regulated utility recovers these excessive costs in rate case proceeding via excessive rates passed along to customers. In another worst case scenario, if the unregulated affiliate charges excessive prices for goods and services to the regulated utility, the regulated affiliate could use these excess monopoly profits to subsidize its other competitive services that it offers in the market.

Q. PLEASE EXPLAIN PROTECTIVE MEASURES IN THE FLORIDA AFFILIATE TRANSACTION RULES.

A. Florida's rule 25-6.1351, Florida Administrative Code ("F.A.C."), Cost Allocation and Affiliate Transactions rules provide minimal protective measures for consumers, even without any consideration of the FERC's waiver. The minimal affiliate transaction protective measures in place at rule 25-6.1351(3)(b)(c)(d), F.A.C, only address the least important and smallest amount of affiliate transactions between TECO and its non-utility affiliates (TECO's FERC waiver application already admitted that these transactions were minimal), because the Florida rules do not govern the largest affiliate transactions between TECO and Emera, its regulated utility affiliates, and its centralized service provider TECO.

The primary Florida affiliate transaction rules are set forth below (along with my comments beneath each rule section), with all rules falling under subsection **(3) Non-Tariffed Affiliate Transactions**, per rule 25-6.1351(3), F.A.C. I will address my understating of the applicability of Florida's affiliate transaction rules based on my expertise on affiliate transactions.

1) **<u>Florida Rule 25-6.1351(3)(a</u>)**, **F.A.C**, states:

> *The purpose of subsection (3) is to establish requirements for non-tariffed affiliate transactions impacting regulated activities. This subsection does **not** apply to the allocation of costs for services between a utility and its parent company or between a utility and its regulated utility affiliates or to services received by a utility from an affiliate that exists solely to provide services to members of the utility's corporate family. All affiliate transactions, however, are subject to regulatory review and approval. (Emphasis added)*

The above rule 25-6.1351(3)(a), F.A.C, specifically exempts and disallows affiliate transaction protective measures for the following types of affiliate transactions (which happen to be the largest affiliate transactions impacting TECO and Emera).

First, Florida rule 25-6.1351(3)(a), F.A.C, specifically exempts and does not provide any protective measures for affiliate transactions between a utility and its parent company. This specifically exempts per rule 25-6.1351(3)(a), F.A.C, the second largest amount of expenses allocated from Emera to TECO (over $4.1 million allocated in 2023).

Second, Florida rule 25-6.1351(3)(a), F.A.C, specifically exempts and does not provide any protective measures for transactions between a utility and its regulated utility affiliates. This is the single largest amount of expenses allocated from Tampa Electric/TECO (the regulated utility and centralized service provider) to its regulated utility affiliates of TECO, PGS, and NMG ($72.8 million allocated in 2023, mostly to TECO, PGS, and NMG)

Finally, Florida rule 25-6.1351(3)(a), F.A.C, specifically exempts and does not provide any protective measures for transactions related to services received by a utility from an affiliate that exists solely to provide services to members of the utility's corporate family, such as a centralized service company. This type of transaction covers the same transactions mentioned in the prior rule, because it is also applicable to the TECO centralized service provider that exists only to provide shared services to the corporate family of affiliates of TECO, PGS, NMG, and other affiliates ($72.8 million allocated in 2023). Technically, the "centralized service provider" does not provide utility services or services to any non-affiliate, so it falls under this exemption.

2) **Florida Rule 25-6.1351(3)(b), F.A.C**, states:

> *A utility must charge an [unregulated][29] affiliate the higher of fully allocated costs or market price for all non-tariffed services and products purchased by the [unregulated]affiliate from the utility. Except, a utility may charge an [unregulated] affiliate less than fully allocated costs or market price if the charge is above incremental cost.*

In my opinion, the last provision of Section 25-6.1351(3)(b), F.A.C., that requires the price to be a minimal "incremental cost" amount negates any meaningful protection measure because a utility could not earn a reasonable return on equity (or rate of return) if it charged prices at incremental cost for all of its services.

3) **Florida Rule 25-6.1351(3)(c), F.A.C**, provides that:

> *When a utility purchases services and products from an [unregulated] affiliate and applies the cost to regulated operations, the utility shall apportion to the regulated operations the lesser of fully allocated costs or market price. Except, a utility may apportion to regulated operations more than fully allocated costs if the charge is less than or equal to the market price.*

As I discussed above, due to the Section (a) Florida rule exceptions, this affiliate transaction rule does not apply to transactions between a regulated utility and its: a)

[29] I have included the term "unregulated" affiliate, because this is the only remaining type of affiliate subject to affiliate transaction rules given the previous Florida rule exemptions, and I have repeated this in term in rule 25-6.1352(3)(c) and 25-6.1352(3)(d), F.A.C.

parent; b) another regulated utility affiliate; and c) a service company. Thus, this rule provides minimal protection because most of TECO's transactions with affiliates are exempt from this affiliate transaction rule.

4) **<u>Florida rule 25-6.1351(3)(d), F.A.C</u>**, states:

> *When an asset used in regulated operations is transferred from a utility to a nonregulated affiliate, the utility must charge the [unregulated] affiliate the greater of market price or net book value. Except, a utility may charge the [unregulated] affiliate either the market price or net book value if the utility maintains documentation to support and justify that such a transaction benefits regulated operations.*

Given the prior Section (a) Florida rule exceptions, in my opinion, this affiliate transaction rule would not apply to transactions between a regulated utility and its: a) parent; b) another regulated utility affiliate; and c) a service company. Thus, this rule provides minimal protection because most of TECO's transactions with affiliates are exempt from this affiliate transaction rule.

The bottom line is that existing Florida affiliate transaction rules provide very minimal protective measures to consumers (and potential competitors). I would recommend that the Commission explore adding more protective measures for customers similar to those provided in FERC's Rules 35.44(b)(1) and 35.39(e)(1).

<u>VII. CONCERNS WITH TECO AS A CENTRALIZED SERVICE COMPANY</u>

Q. DO YOU HAVE CONCERNS WITH TECO'S ROLE AS A REGULATED UTILITY PROVIDING CENTRALIZED SERVICES BASED ON YOUR FAMILIARITY WITH TRADITIONAL NON-UTILITY AFFILIATES PROVIDING CENTRALIZED SERVICES?

A. Yes. As I previously indicated, TECO essentially replaced TECO Services, Inc. as the centralized service company on January 1, 2020, because TECO now provides the same centralized services to the same group of affiliates as previously provided by TECO Services, Inc. Thus, TECO is a centralized service company in all material respects (when considering substance over form), or a "surrogate" centralized service company at the minimum.

In rate case proceedings where I have reviewed affiliate transaction issues, it has been my experience that centralized service companies are non-utility affiliates, and the service company has only one primary responsibility -- to provide corporate support services to other regulated and unregulated affiliates, while the service company is primarily responsible for the detailed affiliate transaction supporting documentation. I believe it is very unusual for a regulated utility, such as TECO, to serve in the role as the primary centralized service company.

Some of my primary concerns with TECO, the <u>regulated utility,</u> providing services to other regulated and unregulated affiliates as a "surrogate" centralized service company are listed below in no particular order of priority.

First, TECO's FERC waiver request stated that it could provide centralized services more efficiently (and reduced overhead expenses) than prior centralized service provider TECO Services, Inc., and simplify the corporate structure. TECO has failed to provide any meaningful documentation to meet its burden to demonstrate that its assumption of centralized service company responsibilities has resulted in increased efficiency and a reduction in overhead expenses. Information provided by TECO shows that allocated expenses have increased after TECO became the centralized service provider.

Second, there is the risk that TECO (serving dual roles as both a regulated utility and centralized service provider) does not have a strong incentive to reduce centralized service expenses and be efficient. When PGS took back certain Procurement shared services in-house, instead of this leading to decreased expenses for these Procurement services due to a reduction in demand, TECO significantly increased these Procurement expenses in subsequent years and essentially made TECO the guarantor for recovery of these expenses. This unfairly penalized TECO for remaining in the centralized shared services cost pool, despite there not being a cost-causation basis to support significant increases in costs to TECO.

Third, TECO's primary role as a regulated utility that also provides centralized services can increase the potential exposure to cross-subsidization, compromise objectivity and independence, and raise concerns regarding the oversight of affiliate transactions. This is a particular concern when certain safeguards do not exist. For example, there has never been an internal audit of TECO's affiliate transactions by either the internal audit division of Emera or TECO.

Fourth, when TECO's complicated accounting for affiliate transactions is comingled with its day-to-day accounting transactions as a regulated utility, it becomes more difficult to identify the impact of affiliate transactions on TECO's books. Further, there is not a reasonable audit trail for these expenses.

Q. HAS TECO PROVIDED DOCUMENTATION TO SHOW ITS SHARED SERVICE EXPENSES HAVE DECREASED AFTER IT BECAME THE CENTRALIZED SERVICE PROVIDER?

A. No, because TECO shared service expenses have actually increased since it replaced TECO Services, Inc. as the *de facto* centralized service provider.

TECO's waiver application with the FERC states the shared services it will now provide instead of TECO Services, Inc. are intended "… to simplify their collective corporate structure, and thereby reduce overhead and capture efficiency benefits associated with housing the provision of centralized shared services within the TECO family under 'one roof.'"[30] TECO has not provided any documentation to support its stated benefits related to becoming the centralized service company, thus TECO has failed to meet a reasonable burden of proof in this regard.

TECO has not provided any documentation to show that shared service overhead expenses have decreased or that any efficiency benefits have been captured. In fact, both total allocable shared services expenses (to be allocated to TECO and other affiliates), and shared services allocated specifically to TECO, have increased based on actual shared service expenses for calendar years 2020 through 2023, and the 2025 budget/forecast used for establishing the revenue requirement and requested rate increase in this rate case. TECO assumed the role as centralized service provider of shared service expenses effective January 1, 2020, but shared service expense for 2019 under the prior centralized service provider, TECO Services, Inc., is not available – which only means a first year comparison is available. OPC originally requested the

[30] TECO July 23, 2019, FERC waiver application, p. 5, and the FERC Order issued October 30, 2019, granting the waiver, p. 2.

2019 shared service expense, but TECO did not provide this information because it stated such information was flawed or was not available on a comparable basis for comparison to subsequent years.

However, shared service expense have gradually increased with TECO as the centralized service provided from 2020 through the 2025 budget/forecast amounts.

Total shared service expense (subject to allocation TECO and all affiliates) decreased from $68.70 million in 2020 to $68.20 million in 2021, and then subsequently increased every year from $72.30 million in 2022, to $72.80 million in 2023, and with one of the largest annual increases to $74.10 million for the 2025 budget/forecast.[31] After a minor reduction in Total shared services expenses of $.50 million from 2020 to 2021, TECO's second year as the centralized service provider produced an unusual significant and alarming increase of $4.10 million from 2021 to 2022 which removed any question about claimed benefits as the centralized service provider. After the minor decrease in shared service expenses from 2020 to 2021, the subsequent four-year average, annual increase in expense was $1.48 million per year from 2021 through 2025/budget. This average annual "increase" is conservatively low and would have been greater except TECO shifted some services from being "allocated" to now being "direct assigned," such as Corporate Communications.

[31] The Total shared service expenses for 2020, 2021, 2022, and 2023 are from TECO's response to OPC Fifth Set of Interrogatories and PODs, Interrogatory No. 95 and POD No. 71, Excel spreadsheets tiled, "(BS 19213) Shared Services Schedule 2020.xlsx", and similar spreadsheets at BS 19214 (Shared Services for 2021), BS 19215 (Shared Services for 2022), BS 19216 (Shared Services for 2023). Total shared service expenses for the 2025 Budget are from TECO's response to OPC Second Set of Interrogatories and PODs, Interrogatory No. 63 and POD No. 39, Excel spreadsheet titled "(BS 17337) TEC SS Budget Schedule 2025.xlsx." Also, TECO's response to OPC Sixth Set of Interrogatories and PODs, Interrogatory No. 103 and POD No. 81, provided file POD_No._81 which included a spreadsheet titled, "(BS 19597) Shared Services Schedule 2023.xlsx.", which is the same Shared Services Schedule for 2023 that was provided in response to POD No. 71 as BS 19216 cited above in a request for Management Reports regarding affiliate transactions.

TECO's allocated portion of the Total shared service expense decreased from $48.20 million in 2020, to $47.40 million in 2021. Thereafter, these expenses subsequently increased every year from $49.80 million in 2022, to $50.60 million in 2023, and with the largest increase to $51.80 million for the 2025 budget/forecast.[32] After a reduction in TECO's shared services expenses of $.80 million from 2020 to 2021, in TECO's second year as the centralized service provider, the same significant and alarming increase of $2.40 million from 2021 to 2022 happened. Once again removing any question about claimed benefits from TECO serving as the centralized service provider after only serving a short time in this role.

The available information shows that shared service expenses have increased almost annually under TECO's guidance as the centralized service provider, and TECO has not provided any documentation to show evidence of increased efficiency or a reduction in these shared service expenses.

TECO's FERC waiver also claimed that its role as the centralized service provider would simplify the corporate structure. This is not true. TECO Services, Inc., the prior centralized service provider, is still in operation and even periodically provides services to other Emera or TECO affiliates and direct charges these services. Thus, there is no evidence that TECO's role as the centralized service provider has resulted in any corporate structure simplification or related cost savings.

There is no evidence to show that TECO has operated more efficiently than prior centralized service provider TECO Services, Inc., which was a stand-alone non-utility affiliate whose only responsibility was to provide centralized services. Further,

[32] *Ibid.*

the role of the centralized services provider added unnecessary responsibility to the role of being a regulated public utility and carrying out important obligations in that role.

Q. CAN YOU PROVIDE AN EXAMPLE WHERE TECO'S ACTIONS AS A CENTRALIZED SERVICE PROVIDER DO NOT APPEAR TO PROMOTE REDUCED SHARED SERVICE EXPENSES?

A. Yes, I can. There is a reasonable risk that TECO does not have a strong incentive to reduce centralized shared service expenses in its dual role as regulated utility and centralized service provider. This is because TECO can directly and specifically influence and impact the amount of centralized shared service expense that Tampa Electric/TECO allocates to TECO and other affiliates, and this allows TECO to impact the amount of shared services expense that it seeks to recover in a rate case proceeding. In a rate case proceeding, TECO may not have a strong incentive to reflect reduced centralized service expenses either via its actual shared service expenses incurred or via its projected/forecasted 2025 shared service expenses used for the revenue requirement calculation in this proceeding. As I discuss below, I provide an example where TECO's 2023 shared service expenses are increasing and may not reflect market or competitive price levels for certain shared services.

For example, OPC asked about the reasons for the changes in the percent and amount of Procurement shared service expenses allocated to TECO from 2020 through the 2025 budget/forecasted period. TECO's response stated that the percent of Procurement expenses allocated to TECO increased from 2022 to 2023 because the percent of expenses allocated to PGS also correspondingly decreased for this same period due to PGS establishing its own supply chain management group in 2023.[33] In other words, Procurement expenses previously incurred by PGS in 2022 are now shifted mostly to TECO, as the regulated entity, in 2023 due to PGS taking back this function in-house in 2023 and not paying TECO, as the centralized service provider, to furnish this as a shared service in 2023 and going forward. I will address my concerns after the table below.

Table 1
Increased TECO Procurement Expense Due to PGS Take-Back

	A	B	C	D
		Procurement Shared Service Expense		
	(In Millions)	Subject to "PO Spend" Allocator		
Ln	Description	2022	2023	2025 Budget
1	Total Subject to Allocation	$4.60	$5.40	$6.30
2	Expense Allocated to TECO	$3.60	$4.80	$6.00
3	Percent Allocated to TECO	79.41%	89.40%	94.06%
4	Expense Allocated to PGS	$0.80	$0.50	$0.30
5	Percent Allocated to PGS	18.42%	9.68%	5.0%
6	Note - Remaining Procurement Shared Services Expenses Are			
7	Allocated to other Affiliates			

The above table shows the total amount of Procurement shared service expense[34] subject to allocation to TECO, PGS, and all other affiliates by TECO (line 1, columns B, C, and D); lines 2 and 4 show the amount of the total Procurement expense that is allocated to TECO and PGS, respectively; and lines 3 and 5 show the

[33] TECO's response to OPC's Tenth Set of Interrogatories and Eleventh Set of PODs, Interrogatory No. 177(e) and POD No. 136.
[34] This is the TECO total Procurement shared service expense that is subject to being allocated to affiliates using the "Purchase Order Spend" allocation factor. There are other Procurement shared service expenses that are allocated to affiliates using a "Headcount" allocation factor, but these expenses are not as significant.

percent of Procurement expense allocated to TECO and PGS, respectively.[35] The table shows actual amounts for calendar years 2022 and 2023, and the 2025 budget amount used for determining the revenue requirement in this rate case.

The above table shows for 2022 (prior to PGS establishing its own supply chain management group), of the total Procurement shared service expense of $4.60 million, TECO allocated $3.60 million (79.41%) to TECO and allocated $.80 million to PGS (18.42%), and any remaining amounts are allocated to other affiliates. In 2023, when PGS began providing its own supply chain services in-house (and did not purchase these services from TECO shared services), the total amount of Procurement expense subject to allocation increased by $.90 million (from $4.60 million in 2022 to $5.40 million in 2023), and the percent allocated to TECO increased by about 10% (from 79% in 2022 to 89% in 2023), and correspondingly the percent allocated to PGS decreased by about 8% (from 18% to 10%) – which is roughly the same percentage increase incurred by TECO. This shift in Procurement expense to TECO was also impacted by the increased headcount allocation factor for TECO.

Finally, for the 2025 Budget, the total amount of Procurement expense subject to allocation has increased by $.90 million (from $5.40 million to $6.30 million), with the amount allocated to TECO increasing by $1.20 million (from $4.80 million in 2023 to $6.0 million for the 2025 Budget), with the corresponding percent allocated to TECO increasing by 5% (from 89% in 2023 to 94% for the 2025 Budget), and the Procurement

[35] The Procurement expense amounts in the above table are per the shared service expenses for 2020, 2021, 2022, and 2023 from TECO's response to OPC's Fifth Set of Interrogatories and PODs, Interrogatory No. 95 and POD No. 71, Excel spreadsheets tiled, "(BS 19213) Shared Services Schedule 2020.xlsx", and similar spreadsheets at BS 19214 (Shared Services for 2021), BS 19215 (Shared Services for 2022), BS 19216 (Shared Services for 2023). Total shared service expenses for the 2025 Budget are from TECO's response to OPC Second Set of Interrogatories and PODs, Interrogatory No. 63 and POD No. 39, Excel spreadsheet titled "(BS 17337) TEC SS Budget Schedule 2025.xlsx."

expense allocated to PGS decreased $.20 million (from $.50 million in 2023 to $.30 million for the 2025 Budget) and the percent allocated declining by 5% (from 10% in 2023 to 5% for the 2025 Budget).

My primary concern is that despite PGS taking back significant Procurement functions in-house in 2023 and reducing its shared service expense,[36] TECO, the centralized services provider, continued to significantly increase the total Procurement expense while shifting an increasing and significant amount of the residual Procurement expense to TECO, the regulated entity, (after the loss of PGS services). Thus, TECO centralized services increased total Procurement expense by $1.7 million (37%) from $4.60 million in 2022 to $6.30 million per the 2025 Budget. Most devastating, TECO, as the centralized services provider, residually shifted almost all of these increased Procurement costs to TECO, as the regulated entity, from 2023 to the 2025 Budget, increasing TECO's Procurement expense by a significant and alarming amount of $2.5 million and 67% from $3.60 million in 2020 to $6.00 million per the 2025 Budget. This caused the percent of Procurement expenses allocated to TECO to increase from 79% in 2022 to 94% per the 2025 Budget, meaning that TECO, as the regulated entity, would pay for almost all of the TECO, the centralize service provider's, Procurement budget by itself.

I believe that PGS taking back its own supply chain management group in-house is an indication that PGS could provide these services to itself on a less expensive and more efficient basis than TECO could provide these centralized services to PGS. The PGS take-back of these services in-house should have prompted concern with

[36] Instead of PGS paying TECO for these shared services in 2023 and going forward.

TECO, and caused them to evaluate and reduce the cost of their Procurement services so these costs are more representative of a competitive market level for these services. Thus, the PGS take-back of the Procurement service could be an indication that these services are not priced as efficiently and effectively as they would be in a competitive market, and may even be excessive and unreasonable.

In a competitive market, one reasonable response is that company would react with reductions in the price[37] of its services to avoid losing potential clients to competitors with market-competitive prices. In essence, there is less demand for the centralized Procurement service with the loss of PGS, and this should have prompted a reduction in cost for these services.

However, because of the dual role of TECO as regulated utility and centralized service provider, I believe there was less incentive to reduce the costs of the Procurement services because these costs can be recouped from captive customers in this monopoly environment. In addition, it makes common sense that when less services are provided (such as the reduction in Procurement services provided to PGS), then a company should reasonably look at reducing the corresponding costs for that service. When I refer to the costs and cost reductions for Procurement centralized services, I believe that the number of employees and labor costs (along with the related overhead costs) should be reduced as a reasonable response to less demand for these services (that likely stem from excessive or unreasonable costs).

Also, because PGS has reduced its purchase of Procurement services, TECO has become the virtual guarantor for recovery of all residual Procurement costs at

[37] Or the competitive market could also react by offering more services and better quality for the price of the service.

elevated levels, with TECO now responsible for paying for 94% of the total Procurement centralized services under TECO's 2025 Budget proposal. It is not reasonable for TECO to be the guarantor for recovery of these Procurement costs at any expense level. Most importantly, if another affiliate acts reasonably to take services back in-house and rely less upon TECO's centralized services, then TECO, the regulated entity, should not be irreparably harmed by having to guarantee these lost centralized service revenues to TECO, the centralized service provider. This is not a normal competitive-market and real world reaction to this type of situation. Additionally, shifting Procurement costs from one affiliate to another to guarantee full recovery of Procurement costs is not supported by any reasonable cost-causation principles. TECO, the regulated utility, did not cause the centralized service provider TECO to lose Procurement services via the PGS take-back of these services in-house, and there is no cost-causation justification for requiring TECO, the regulated entity, to pay for the residual and significant increasing cost of Procurement service.

I have addressed my concerns with this matter, and similar issues, by proposing adjustments later in my testimony. In those adjustments, I am mitigating the negative impact of excessive or unreasonable residual cost allocation to TECO, which is also a way to address the significant unsupported increase in Procurement costs in 2023 (and projected through the 2025 Budget costs). TECO has not met a reasonable burden of proof because it has not provided adequate supporting documentation to justify the significant increase in costs of Procurement services, and the related unfair practice of residually allocating all Procurement costs to TECO, as the regulated entity, when another affiliate takes services back in-house and relies less upon TECO's centralized services.

Finally, my bottom line concern regarding the above testimony goes to TECO's dual role as both a regulated utility and centralized service provider. If a stand-alone unregulated affiliate was providing centralized services there would be more incentive to act responsibly and reduce centralized service costs under the conditions that I described. In contrast, a regulated utility like TECO has less incentive to reduce centralized service costs and has more incentive to make the regulated utility the guarantor for recovery of all residual centralized service cots, because these costs can be recouped from customers in a rate case proceeding.

Q. DOES TECO'S PRIMARY ROLE AS A REGULATED UTILITY INCREASE THE EXPOSURE FOR CROSS-SUBSIDY AND COMPROMISE INTERNAL CONTROLS AND OBJECTIVITY AS A CENTRALIZED SERVICE PROVIDER?

A. Yes. TECO's responsibilities as both a regulated utility and centralized service provider raises potential concerns of cross-subsidy and the compromise of internal control safeguards and objectivity. I previously explained there can be an incentive for other affiliates to charge above-market costs to the regulated utility[38] and for the regulated utility to charge below-market costs to other affiliates.[39] If cross-subsidization occurs between the regulated utility and the other unregulated affiliates,

[38] Thus, FERC (and some state regulatory agencies) have rules or policy generally requires that affiliates charge services to the regulated utility at the lower of cost or market prices.

[39] Thus, FERC (and some state regulatory agencies) have rules or policy generally requires the regulated utility to charge services to other unregulated affiliates at the higher of cost or market prices.

this can result in: 1) excessive expenses on the regulated utility's books being passed through to customer rates in a rate case; or 2) other affiliates (that offer competitive services) gaining an unfair price advantage in the market by reducing its prices by the amount of any cross-subsidies and pricing its services at levels to gain market share (or to drive competitors out of business).

TECO, in its role as the centralized service provider for certain affiliates, could establish allocation methods or allocation factors that unreasonably overstate or understate the amount of transactions between Emera, TECO and other affiliates in order to game the system and promote cross-subsidization. Because TECO controls the books for recording these affiliate transactions, it could also manipulate accounting entries to promote cross-subsidization. Generally, most companies have reasonable separation of duties and internal controls in place to protect against improper accounting and other illicit transactions. This is another example of why there should be a reasonable separation of duties to discourage manipulation and malfeasance, and why the regulated utility should not also be the centralized service provider.

Technically, even if TECO was not the centralized service provider, TECO and the centralized service provider (and other affiliates) could still use collusion to carry out a cross-subsidy scheme. However, it is commonly understood from an accounting transaction perspective that while there is the potential for a cross-subsidy scheme, this does not prevent the implementation of reasonable safeguards and internal controls. In the rate case proceedings where I have reviewed affiliate transactions, I believe the exposure to potential cross-subsidization or even accounting malfeasance is mitigated by the centralized service provider being a separate stand-alone unregulated affiliate that is not the same as the regulated public utility.

It is equally important for appearance purposes that a separate affiliate performs the centralized service provider function, in order to preserve and enhance objectivity and in order to more reasonably approximate third-party or arms-length transactions to mitigate any potential cross-subsidy and accounting malfeasance. It is always reasonable for there to be a proper separation of duties with the attendant safeguards and internal controls in place.

Finally, TECO has stated that no internal audits have been performed regarding the review of affiliate transactions for the calendar years 2019 to 2024,[40] which cover the last year of TECO Services, Inc. role as centralized service provider and the entire duration of TECO's role as centralized service provider. I believe this illustrates the lack of reasonable and responsible internal controls and safeguards regarding TECO's role as a centralized service provider. I would recommend that the Commission require Emera to perform an internal audit of TECO's affiliate transactions and report the results to the Commission or file this information in the next TECO or PGS rate case.

Q. DOES TECO'S COMINGLED ACCOUNTING TRANSACTIONS AS A DUAL PROVIDER OF CENTRALIZED SERVICES PROVIDER AND FOR DAY-TO-DAY REGULATED UTILITY OPERATIONS RESULT IN AFFILIATE TRANSACTIONS THAT CANNOT BE EASILY RECONCILED TO BOOK BALANCES?

[40] TECO's response to OPC's Second Set of PODs, POD No. 43.

A. Yes. TECO's books include comingled accounting transactions regarding affiliate transactions as a centralized service provider, along with day-to-day transactions regarding its regulated utility operations. This makes it more difficult to identify the impact of affiliate transactions on the books and to provide for a reliable audit trail when attempting to verify and validate the impact of affiliate transactions on expenses. Because TECO both purchases services from affiliates and sells services to affiliates (along with multiple ways of recording these transactions), this contributes to the difficulty in reviewing the impact of affiliate transactions on TECO's books.

For example, in most rate cases where I review affiliate transactions, the regulated utility records the allocated expenses for corporate support and overhead costs from the parent company or the centralized service company (and sometimes both) on its books. In most of these cases, the specific amount of these affiliate expenses can be easily identified on the regulated utility books in several Administrative and General expense accounts[41] (or subaccounts) and no detailed reconciliation of these expense amounts via confusing and voluminous Excel spreadsheets is required.

However, in this rate case proceeding, TECO does not have ending account balance on its books that readily show the affiliate expense for services provided by affiliates to TECO – and this expense amount cannot be tied directly to a specific Administrative and General expense account balance (or any specific expense account balance) on the TECO books. Likewise, TECO's books do not show an ending account balance reflecting TECO's affiliate contra expenses (or revenues) for services provided

[41] For most regulated utilities, the amount of affiliate expense paid by the regulated utility to an affiliate services is recorded in the accounts or subaccounts of the Administrative and Geneal expense account.

by TECO to affiliates – this contra expense or revenue amount cannot be tied directly to a specific Administrative and General contra expense (or any specific revenue account balance) on the TECO books. This is because TECO's books include a lot of comingled centralized service provider affiliate transactions (including expenses, expense offsets, and other entries to accounts receivable and other accounts) and day-to-day accounting transactions of the regulated utility operations.

For example, OPC asked TECO to reconcile its affiliate expenses to the Administrative and General expense for calendar year 2023 and the 2025 Budget at TECO Mr. Latta's MFR Schedule C-30, Schedule 1. TECO's responses[42] did not provide a reconciliation of the affiliate expenses to the Administrative and General expense account balance for 2023 or the 2025 Budget but instead just referred to a "net amount of affiliate charges contained in A&G accounts totaling ($13,163,452)." The negative amount of ($13,163,452) is not an ending account balance for any specific Administration and General expense balance, but is instead the result of netting certain detailed accounting transactions in the Administrative and General account.

Additionally, TECO referred to its response to other discovery responses,[43] specifically, the folder "POD_5-74" which included PDF document "(BS #19477-19511) POD_5_74_bates.pdf" that showed the FERC Form 1 summary of TECO affiliate transactions for 2023 and Excel spreadsheet "(BS #19476) 2240026-EI OPC

[42] TECO's response to OPC's Fifth Set of Interrogatories and PODs, Interrogatory No. 99 and POD No. 75.
[43] TECO's response to OPC's Fifth Set of Interrogatories and PODs, Interrogatory No. 98 and POD No. 74, and file "POD_5_74", including PDF document "(BS #19477-19511) POD_5_74_bates.pdf" and Excel spreadsheet "(BS #19476) 2240026-EI OPC Schedule 1 to 5th Set of ROGS_TEC Revised.xlsx." This Excel spreadsheet shows various net affiliate transaction amounts related to TECO "Purchase" of services from affiliates and TECO "Sale" of services to affiliates with for the periods 2020, 2021, 2022, 2023, 2024, 2024 Budget, and 2025 Budget. This similar Excel spreadsheet was also provided with Excel spreadsheet "OPC_Affiliate_Purchase by FERC" file, at BS 28786.

Schedule 1 to 5th Set of ROGS_TEC Revised.xlsx." This Excel spreadsheet was prepared by TECO to reconcile to the 2023 FERC Form 1 affiliate diversification data, and the spreadsheet shows the individual amount of affiliate transaction purchases and sells by affiliate that impact TECO for 2023, and the net amount of all these transactions equals the net negative balance of ($13,163,452) cited previously in the prior paragraph. Again, this Excel spreadsheet is a list of various net transactions with affiliates that impact various TECO accounts during 2023, but none of these net transactions for each affiliate agree or tie to an Administrative and General expense account balance for 2023.

Because TECO is unable to identify and provide specific ending account balances for affiliate transactions in its Administrative and General expense accounts, it appears that TECO has analyzed or queried its accounting books to identify the amount of affiliate transactions with various affiliates and provide these amounts in a spreadsheet – although none of these expense or other account balances for any particular affiliate will agree or tie to an ending account balance on TECO's books.

It is difficult to place a strong degree of reliance on the negative net transaction balance of ($13,163,452) or the individual net transactions of various affiliates when there are not any specific account balances on the books to which these amounts can be readily traced or agreed. Thus, there is not a clear or specific audit trail to reconcile these transactions to amounts on TECO's books or to ending account balances.

In addition, the dual role of regulated utility and centralized service provider unduly complicates, confuses, and makes it difficult to easily identify or reconcile the TECO purchase and sale of affiliate services. For example, OPC's Second Set of

Interrogatories, Interrogatory No. 61 and POD No. 37 asked for the allocation of all affiliates costs (and related allocations factors) to TECO (by function and type, and account number) from 2019 to 2024, and in response, TECO provided an Excel spreadsheet showing Emera's allocations to TECO and all other applicable foreign and U.S. regulated and unregulated affiliates from 2020 to 2023 (response dated April 22, 2024).[44]

OPC Interrogatory No. 61 included twelve sub-part questions and the related POD asked for all supporting documentation. TECO did not provide a written response to any of the twelve sub-part questions of Interrogatory No. 61 (except for multiple Objections), but instead its response to POD No. 37 only referred to attached "CONF_POD_2_37" with various voluminous Confidential spreadsheets, but no explanations were provided for amounts and other information in the voluminous spreadsheet.

Further, I was unable to reconcile the amounts allocated from Emera to TECO with various other documents provided by Emera. I raised this concern in informal conference calls between OPC and TECO, and no resolution or explanation was forthcoming. Thus, OPC issued its Tenth Set of Interrogatories and Eleventh Set of PODs, Interrogatory No. 179 and POD No. 138, as a follow-up because of the inability to reconcile Excel spreadsheet amounts in Confidential POD No. 61 to other TECO-provided documents.

[44] TECO's response to OPC's Second Set of Interrogatories and PODs, Interrogatory No. 61 and Confidential POD No 37, including file "CONF_POD_2-37" that included Confidential Excel spreadsheets "Emera Affiliate Allocations – Annual Summary 2023 041724 Highlighted.xlsx", "Emera Affiliate Allocations – Annual Summary 2022 041724 Highlighted.xlsx", "Emera Affiliate Allocations – Annual Summary 2021 041724 Highlighted.xlsx", and "(BS 16847) Emera Affiliate Allocations – Detailed Total 2021-2023_Highlighted.xlsx."

TECO's response, provided on May 23, 2024, almost a month after the initial Interrogatory and POD raising these issues, explained for the first time that the spreadsheets with Confidential POD No. 37 were expressed in Canadian currency, and this is why the amounts did not agree with other documents expressed in U.S. currency. It took substantial time and delay for TECO to make this determination of the conflicting currencies between various documents the Company provided. This is another example of the complexity and problems of a regulated utility trying to also fill the role as a centralized service provider.

I believe if TECO did not serve in the dual role of regulated utility and centralized service provider, the stand-alone books of both separate entities would be more simplified, easier to follow, and more likely to provide an audit trail to identify and reconcile affiliate transactions.

<u>VIII. RECOMMENDATIONS FOR TECO AS A CENTRALIZED SERVICE PROVIDER</u>

Q. BASED ON THE NUMEROUS PROBLEMS YOU HAVE IDENTIFIED WITH TECO'S DUAL ROLE AS A CENTRALIZED SERVICE PROVIDER AND REGULATED UTILITY, WHAT ARE YOUR BOTTOM LINE RECOMMENDATIONS?

A. It would likely be unacceptable for TECO to relinquish its centralized service provider responsibilities and to have another unregulated affiliate assume these responsibilities. In addition, it is not clear if the Florida Commission could require this divestiture – and the implications of this change in various jurisdictions for different affiliates could be problematic.

Also, even if TECO can provide additional documentation to show that its ascension to the role of centralized service provider did result in some cost savings and efficiencies, there should be proper consideration of any cost savings benefits weighted against the negative repercussions of a regulated utility serving as centralized service provider. These negative repercussions include less incentives to reduce centralized service costs allocated to affiliates, compromised safeguards and objectivity, increased exposure to cross-subsidy, absence of a strong audit trail to reconcile affiliate transactions, and the undue complexity of mixing conflicting objectives of a regulated utility and a centralized service provider.

However, in the absence of divesting TECO of centralized service provider responsibilities, I would recommend the following:

1) TECO should propose a timeline and plan for achieving all of the following recommendations with periodic updates to the Commission, OPC, and interested parties. The Plan should be filed and available to all parties, and in place within one year or before the next TECO or PGS rate case.

2) TECO should identify all prior and ongoing cost savings associated with becoming the centralized service provider, and TECO should identify these cost savings by year and account number (and any specific cost savings by affiliate) and provide all other supporting documentation and calculations. TECO should

propose a plan for flowing these cost savings back to customers in this rate case and future rate cases, or explain why this is not appropriate.

3) TECO should provide supporting documentation to explain and calculate the impact of all instances when an affiliate takes back certain centralized shared services in-house (and reduces or eliminates the reliance on the centralized shared services). TECO should provide alternative suggestions regarding how the residual costs of the related centralized shared service can be equitably treated among remaining affiliates, and explain why it would not be reasonable to reduce the overall costs of these shared services if demand is reduced for the service or if the costs are not comparable with the fair market value of similar services from third parties (or surrogate calculations of third party services). This documentation should be made available for all TECO and PGS rate cases all in Florida and filed at the outset of each rate case as an MFR.

4) TECO should make significant changes in its accounting system to more easily track, identify, and provide a proper audit trail for all affiliate transactions by each affiliate. TECO should have various expense subaccount balances that shows only the specific gross expense (not netted with other affiliate or non-affiliate transactions) it pays to each affiliate for each year. This account should include only "affiliate" transactions and not any other accounting transactions related to the regulated utility operations. Likewise, similar to expense transactions, TECO should have a separate contra expense account balance with

similar tracking, showing all "credits" or reductions to expense accounts by affiliate (with no other accounting transactions related to regulated utility operations). These accounts should allow TECO or third parties to identify and know the amount of gross expense that TECO pays to an affiliate at any point in time for services provided to TECO by affiliates, and the same information should exist for any contra expenses (or revenues) related to services that TECO provides to other affiliates.

5) The amounts in item (4) above should reconcile to TECO's FERC Form 1 affiliate diversification data. The FERC Form 1 affiliate diversification data should separately show all affiliate "expense" amounts by affiliate and major services/agreements, all "contra-expense" amounts by affiliate and major services/agreements.

6) TECO should require an external management audit of TECO's role as central service provider and the review of the affiliate transaction process, including Emera and Tampa/TECO provision of corporate support and shared services to TECO and other affiliates – including allocation factors and inputs. All of the previous concerns that I have raised should be subject to review.

This management audit should not be performed by a Certified Public Accounting firm or its management/consulting audit affiliate that has had a prior or current relationship with Emera, TECO, or any affiliate. Preferably, TECO should not hire a Certified Public Accounting firm or its management/consulting audit affiliate because these entities establish a confidential internal “materiality factor” for such engagements. The “materiality factor” establishes a dollar value which the firm believes is material enough to require disclosure for accounting errors, incorrect allocations, improper allocation factors and other dollar-value or policy impacts. These firms do not disclose their materiality factors and these firms can have a vastly different opinion of what constitutes a material error or impropriety from their accounting perspective, compared to the perspective of materiality by regulators in a rate case proceeding.

7) Separate and specific monthly invoices should be sent by TECO to affiliates which identify and document only the centralized shared services (and related contra expenses or revenues) provided by TECO to affiliates. Likewise, monthly invoices should be sent by affiliates to TECO which identify and document only the centralized shared services expenses for services provided to TECO by the affiliate. All gas purchases transactions should be billed separately by all affiliates, and not comingled or netted in billings with centralized services.

8) Emera and TECO should establish a formalized written set of internal controls and safeguards to address the accounting for centralized services, cross-subsidy

issues, objectivity and independence, and other potential concerns regarding the centralized service provider.

9) Emera should perform an internal audit of TECO's role as centralized service provider, along with a review of affiliate transactions, allocation processes, issues related to cross-subsidy, the treatment of the take-back of shared services by affiliates and other important matters. The internal audit report, recommendations, and the results of implemented recommendations be filed with the Commission and available to interested parties.

IX. ABSENCE OF SUPPORT FOR AFFILIATE ALLOCATION PROCESS

Q. DID THE COMPANY'S TESTIMONY ADDRESS AFFILIATE ISSUES IN ANY DETAIL?

A. No. TECO witness Mr. Richard Latta's direct testimony (now adopted by Mr. Chronister) addresses affiliate transactions very briefly[45] at a high level and he does not address any specific affiliate transaction amounts or impacts upon TECO. Also, Mr. Latta's testimony does not refer to any affiliate-related adjustments proposed by TECO, and he does not state that TECO relied on the 2025 Budget affiliate expenses (and adjusted allocation factors) for purposes of adjusting the revenue requirement in this rate proceeding.

TECO witness Mr. Chronister's direct testimony did not address affiliate transactions, does not refer to any affiliate-related adjustments proposed by TECO, and

[45] Latta direct, pp. 51-55.

does not state that TECO relied on the 2025 Budget affiliate expenses (and adjusted allocation factors) for purposes of adjusting the revenue requirement in this rate proceeding.

The direct testimony of TECO does not provide adequate supporting documentation to address or justify the significant levels of affiliate expenses on TECO's books, either for the 2023 calendar year or for the 2024/2025 Budget period.

Q. WAS THE COMPANY ABLE TO PROVIDE INDEPENDENT OR OBJECTIVE STUDIES TO SUPPORT THE REASONABLENESS OF ITS ALLOCATIONS AMONG AFFILIATES?

A. No. TECO states that Emera, TECO, and affiliates have not performed analysis or studies to address the reasonableness of affiliate expenses.[46] Therefore, there is no internal or external prepared independent or objective analysis or studies to support the reasonableness of affiliate expense transactions on TECO's books. There is no study that compares TECO's affiliate transactions to the market or industry benchmarks to determine if the transactions are reasonable.

X. SUMMARY OF OPC AFFILIATE CHARGE ADJUSTMENTS

Q. IS IT CLEAR WHETHER TECO'S AFFILIATE EXPENSES ARE REFLECTED ON A 2025 BUDGET BASIS OR BASED ON AN ADJUSTED DECEMBER 31, 2023, BASIS?

[46] TECO's response to OPC's Second Set of Interrogatories and PODs, Interrogatory No. 73 and POD No. 44.

A. It is not clear because there are conflicting responses by TECO to OPC Interrogatories, but I have assumed a worst case scenario that TECO increased its affiliate expenses to the higher level included in the 2025 Budget. Therefore, all of my adjustments are to the 2025 Budget affiliate expenses (and the underlying 2025 Budget allocation factors and inputs). If this is incorrect, then it may be necessary for to correct my testimony.

TECO states that it did not make any adjustments for affiliate charges in the Administrative and General accounts (which is the account where most of the affiliate expenses are recorded), and it cited to a net balance of affiliate transactions in the Administrative and General account that is related to the actual December 31, 2023, book balance.[47] This response appears to indicate that TECO did not make any affiliate transactions adjustments and did not use 2025 Budget amounts for affiliate expenses.

However, TECO appears to provide a conflicting response to another OPC Interrogatory that indicates did make adjustments to affiliate expenses based on the 2025 Budget when it states, "The allocation factors reflected on the Excel spreadsheet impact the 2024/2025 budget amounts through the budgeting of credits to FERC account 922 for the portion that is allocated to affiliates."[48]

Despite TECO's conflicting and unclear responses, I am adjusting from the higher level of affiliate expenses included in the 2025 Budget.

Q. PLEASE SUMMARIZE CONCERNS AND UNDERLYING RATIONALE FOR YOUR ADJUSTMENTS TO AFFILIATE EXPENSES.

[47] TECO's response to OPC's Fifth Set of Interrogatories and PODs, Interrogatory No. 99 and POD No. 75.
[48] TECO response to OPC Tenth Set of Interrogatories and Eleventh PODs, Interrogatory No. 177 and POD No. 136.

My concerns and underlying rationale for adjustments are summarized below.

1) Emera, Tampa Electric, TECO, nor any other affiliate has performed, or caused to be performed, any independent or objective review or analysis of affiliate transactions to determine that the amounts charged from Tampa Electric to TECO (and other affiliates) are reasonable, rely on proper cost allocation methods, and are consistent with the market or benchmarks in the industry.[49]

2) TECO has failed to meet a reasonable burden of proof regarding affiliate expenses charged from Tampa Electric to TECO by failing to provide certain requested supporting documentation and calculations to address the validity and reasonableness of the amounts.

3) TECO provided information with some schedules showing certain types of affiliate expenses in Canadian currency, while other types of affiliate expenses were provided only in U.S. currency. It was not until late May 23rd that TECO was able to reconcile and provide these affiliate expenses in consistent U.S. currency.[50]

4) A flawed MMM allocation method is used to allocate expenses to TECO, and this is merely a three-factor formula and not a "Massachusetts Method" because two of the three inputs vary from the actual Massachusetts Method.

[49] TECO response to OPC Second Set of Interrogatories and PODs, Interrogatory No. 73 and POD No. 44.
[50] TECO response to OPC Tenth Set of Interrogatories and Eleventh Set of PODs, Confidential response to Interrogatory No. 179 and POD No. 138.

5) The flawed MMM uses Net Income as one of its three equally weighted allocation factors. Net Income is not a proper allocation factor (or driver of costs) because there is no cost-causation (or correlation) between Net Income and the affiliate expenses that it is being used to allocate. Net Income is not an allocation factor in the original Massachusetts Method, and Net Income is not an industry standard or best practice allocation factor based on my experience. I made adjustments to allocations to TECO by revising the MMM allocation factor.

6) PGS took back Procurement shared services in-house that were previously allocated via centralized shared services and the residual expenses previously allocated to PGS are now shifted to TECO, along with significant increasing Procurement expenses – and TECO has unfairly become the guarantor of recovery for all residual expenses although this is not supported by cost-causation. These Procurement expenses are adjusted to a more reasonable level when I substituted a net plant investment allocation factor for TECO’s Purchase Order Spend allocation factor.

7) Some allocation factors used to allocate expenses to affiliates for the actual 2023 calendar year financials are based on 2022 inputs (one year in arrears), and these inputs should be updated to actual 2023 inputs at the minimum when reasonable.

8) Certain allocated shared service expenses use an incorrect allocation factors in Excel spreadsheets that do not agree with the allocation factors in the underlying supporting workpapers showing the calculations, and I have adjusted these allocation factors.

9) No internal audits have addressed affiliate transactions from at least calendar years 2019 to 2024.[51]

XI. ADJUSTMENT BCO-1: UNSUPPORTED AFFILIATE EXPENSES

Q. PLEASE EXPLAIN ADJUSTMENT BCO-1 REGARDING EMERA ALLOCATED EXPENSES TO TECO?

A. I will explain this adjustment below the following Confidential table:

Table 2
Adjustment BCO-1

	A	**B**	**C**	**D**	**E**	**F**
	Emera and	Corporate	Canada $	US $	TECO	
	Emera Services, Inc.	Support	Actual	Actual	Budget	OPC
Ln	Services	Services	2023	2023	2025	Adjustment
1	Emera	Direct		$ 11,117,821	$11,075,000	
2	Emera	TSI Allocated	$1,158,628	$ 858,561	Not provided	$ (858,561)
3	Emera	Allocated	$4,132,878	$ 3,062,525	Not provided	
4	Emera Services, Inc.	Direct		$ 4,134,342	$ 4,421,000	
5	Total Direct and Allocated		$ 5,291,506	$ 19,173,249	$15,496,000	
6	Direct Charges Not Subject to Adjustment		$ -	$ 15,252,163	$15,496,000	
7	Allocated Charges Subject to Adjustment		$ 5,291,506	$ 3,921,086		
8	Ostrander/OPC Adjustment					**$ (858,561)**

[51] TECO response to OPC Second Set of PODs, POD No. 43.

The Confidential table above shows total direct and allocated expenses from Emera and Emera Services, Inc. for calendar years 2023 and the 2025 Budget, except I was not able to locate 2025 Budget amounts for Emera "TSI allocated" and Emera "allocated" expenses to TECO. Therefore, I have removed Emera expenses allocated to TECO Services, Inc. in 2023 of $.90 million using the 2023 balance, although this could potentially overstate or understate this adjustment depending upon the related amount of 2025 Budget expense used by TECO in the revenue requirement calculation. This adjustment is shown at Exhibit BCO-2. The bottom line adjustment amount and the reasons for the adjustment are not Confidential. However, the calculation and how it was determined from the amounts in the Confidential table above are Confidential. For example, the $.90 million adjustment amount is not specifically identified in any TECO Confidential or public responses to interrogatories or PODs, but how that amount was calculated from the Confidential table above is considered Confidential, although no party would know how the amount is calculated without access to all of the underlying Confidential amounts in the table above. Therefore, the adjustment that is publicly disclosed is not determinable by parties without access to Confidential information.

The total Emera direct and allocated charges to TECO for 2023 is $19.20 million, although the Emera direct charge of $11.10 million and the Emera Services, Inc. direct charge of $4.10 million (a total of $15.30 million) do not impact TECO expenses because these charges are treated as an Accounts Receivable accounting entry. Thus, the remaining Emera expenses allocated to TECO in 2023 is $3.90 million and I have removed $.90 million of the TECO Services, Inc. related allocated expenses.

TECO states that TECO Services, Inc. will be legally dissolved in 2024, with seconded employees that work for Emera affiliates to be moved from TECO Services, Inc. to TECO, although this will not result in an increase in expenses on TECO's books because direct charges only result in a debit to FERC Account 146 (Accounts Receivable) to recognize the affiliate receivable, and no FERC expense accounts are charged.[52]

TECO states this Emera charge is a direct expense that does not impact expense accounts, so the dissolution of TECO Services, Inc. will not result in a change in expense amounts for TECO. I disagree. This amount is an Emera allocated expense that will impact TECO's expenses, so I have made an adjustment to remove this expense. Although I have translated this expense adjustment amount to U.S. currency of $858,561,[53] the related Canadian currency amount of $1,158,628 is shown as the total expense allocated from Emera to TECO Services, Inc. at TECO's response to Interrogatory No. 61 and Confidential POD No. 37.[54]

In addition, I have removed this expense because TECO has not provided any supporting documentation to show that it is reasonable, efficient, and not duplicative

[52] TECO's response to OPC's Eighth Set of Interrogatories and Ninth Set of PODs, Interrogatory No. 156 and POD No. 119.

[53] This amount is translated to US currency by dividing the Canadian currency amount by a factor of 1.3495.

[54] TECO's response to OPC's Second Set of Interrogatories and PODs, Interrogatory No. 61 and Confidential POD No 37, including file "CONF_POD_2-37" that included Confidential Excel spreadsheets "Emera Affiliate Allocations – Annual Summary 2023 041724 Highlighted.xlsx", "Emera Affiliate Allocations – Annual Summary 2022 041724 Highlighted.xlsx", "Emera Affiliate Allocations – Annual Summary 2021 041724 Highlighted.xlsx", and "(BS 16847) Emera Affiliate Allocations – Detailed Total 2021-2023_Highlighted.xlsx."

of existing TECO expenses to transfer the expenses of dissolved TECO Services, Inc. to TECO operations in 2024. If TECO Services, Inc. is being dissolved, it would appear to defeat any benefits of cost cutting to merely transfer all expenses of a dissolved company to TECO operations. TECO has not explained why it is reasonable to dissolve TECO Services, Inc. and why it is reasonable to transfer its expenses to TECO. This does not appear to accomplish anything that is beneficial for either TECO Services, Inc. or TECO. TECO has failed to meet its reasonable burden of proof regarding the justification for transferring and recovering these TECO Service, Inc. expenses through TECO operations in future years. Therefore, the Commission should adopt my adjustment to remove these expenses.

Q. DID TECO PROVIDE ALL OF THE REQUESTED SUPPORTING DOCUMENTATION AND CALCULATIONS FOR THE AFFILIATE EXPENSES ADDRESSED IN ADJUSTMENT BCO-1?

A. No. OPC issued numerous interrogatories and production of documents to gain access to supporting documentation, calculations, and allocation methods applicable to all affiliate transactions (both direct and allocated/assessed amounts), and TECO did provide this requested information for some affiliate charges, but not for all of the affiliate charges subject to Adjustment BCO-1. For example, the following interrogatories and production of document requests all asked for information where TECO should have provided the supporting documentation for Emera and Emera Energy Services, Inc. affiliate expenses. Further, I will expound in detail below on the multiple discovery requests propounded that demonstrate TECO had ample opportunity to provide the relevant supporting documentation and calculations.

<u>OPC's Second Set, Interrogatory No. 61 and Production of Documents No. 37</u>

This interrogatory is subtitled "Top Down Allocation of Affiliate Costs to TECO," and requested the allocated/assigned affiliate expenses from Emera (Parent) TECO for years 2019 to 2023 (and budgeted amounts), starting with Emera (Parent Company) and showing the allocated costs through all intermediate companies (service companies) through the final allocation to TECO. Also, this interrogatory requested all affiliate costs be provided by function (Corporate, Human Resources, etc.) and type (payroll, rent, etc.) as allocated to TECO and all affiliates, and requested all allocation factors and the underlying calculations and supporting documentation (along with additional information requested). This interrogatory was very precise and specific in its request for "allocated" and "assigned" (meaning all allocated, direct, and other) affiliate costs from Emera and other affiliates to TECO, along with supporting documentation and calculations. The related POD asked for all supporting documentation regarding the rationale, calculations, and conclusions for Interrogatory No. 61.

TECO's response to Interrogatory No. 61 provided no explanation of documents or information being provided, but referred to its objections in related POD No. 37 and referred to the Confidential documentation provided with POD No. 37. TECO's response to POD No. 37 repeated the same numerous objections that it includes with almost all of its responses to OPC Interrogatories and PODs related to affiliate issues and also referred to the provided Confidential document at "CON_POD_2_37." CON_POD_2_37 included an Excel spreadsheet titled, "(BS 16846) Emera Affiliate Allocations – Annual Summary 2023_Highlighted.xlsx" (cited as "Confidential BS 16846"); similar files were provided for years 2021 and 2022).

It is important to point out that for some unexplained reasons, the amounts at BS 16846 were provided in Canadian currency, although other TECO responses to OPC Interrogatories and PODs addressing allocations from TECO (or other affiliates) were all provided in U.S. currency.

Q. DID TECO FAIL TO TIMELY IDENTIFY AND PROVIDE A RECONCILATION FROM CANADIAN TO U.S. CURRENCY FOR AFFILIATE EXPENSE?

A. Yes. I addressed this in a prior section of my testimony, so I will not repeat all of the same concerns again.

Q. HAS TECO PROVIDED COPIES OF AGREEMENTS FOR THE EMERA AND EMERA ENERGY SERVICES, INC. DIRECT EXPENSES?

A. No. I am not aware that TECO has provided copies of the Emera Energy Services, Inc. "Asset Management Agreement" or any agreements or contracts supporting the Emera "Corporate Support Services." Although the provision of these agreements or contracts by themselves may not adequately satisfy my request for "supporting documentation and calculations" for these expenses,[55] it would be a helpful starting point.

[55] My conclusion would be different if the agreements and contract documents include the supporting documentation and calculations for these expenses charged to TECO.

TECO's Schedule No. C-31, page 24 of 35 (BS 91) refers to three documents entitled Emera "Services Agreement" with Tampa that were all shown as being renewed in 2023, along with another "Services Agreement." The MFR information does not mention a termination or renewal date. Similarly, TECO's Schedule No. C-31, page 25 of 35 (BS 92) refers to two Emera Energy Services, Inc. documents entitled "Services Agreement," with one shown as being renewed in 2023 and one shown as being effective until 2029, along with a "Asset Management Agreement" that is shown as being effective until 2026. All of these documents are relevant and important, particularly to review changes in terms and costs from prior agreements. TECO's failure to provide these existing documents is another example of TECO's failure to meet a reasonable burden of proof regarding certain affiliate charges.

XII. ADJUSTMENT BCO-2: ADJUST TAMPA ELECTRIC AFFILIATE EXPENSES

Q. PRIOR TO EXPLAINING ADJUSTMENT BCO-2, DO YOU HAVE OTHER CONCERNS REGARDING AFFILIATE ALLOCATIONS THAT YOU HAVE NOT ADDRESSED AS AN ADJUSTMENT AT THIS TIME?

A. Yes, my concerns are as follows. OPC's Second Set of Interrogatories and PODs, Interrogatory No. 65 and POD No. 41 requested certain financial and other data from 2020 to 2024 for various foreign and U.S. affiliates (including TECO) to which both Emera and Tampa Electric allocate corporate and shared services expenses based on financial and other data used as inputs in the allocation factors. The amount of affiliate expenses allocated to TECO is also affected by the amount of affiliate expenses allocated to other foreign and U.S. affiliates based on the various financial and other data used in the allocation factors.

Thus, it is necessary to review these allocation factor inputs to determine if expenses allocated to TECO are reasonable and not overstated, based on related allocations to other affiliates. TECO's response objected to providing this financial/data allocation input information for other foreign and U.S. affiliates but TECO did provide a high level explanation of the various affiliates without providing any financial or other data. There are no publicly available sources for me to obtain this data to confirm the reasonableness of allocation factors and the related allocation of expenses to other affiliates that also impacts the residual allocation to TECO. Therefore, this continues to be a concern and could result in additional adjustments to affiliate expenses.

Q. PLEASE EXPLAIN ADJUSTMENT BCO-2.

A. I will explain this adjustment below the following table.

Table 3
<u>Summary of Adjustment BCO-2</u>

	A	B	C
	(In Millions)		OPC
	Tampa Electric Expenses	OPC	Adj.
Ln	Allocated to TECO	Adjs.	No.
1	Replace Net Income MMM Factor/Update Other Factors	$ (0.40)	2.1
2	Remove One-Half of Corp. Responsibility Costs	$ (3.60)	2.2
3	Revise Human Resources Headcount Factor	$ (0.20)	2.3
4	Revise Procurement Factor to Net Plant Investment	$ (1.30)	2.4
5	Total OPCAdjustments	$ (5.50)	

Tampa Electric records all Shared Services expense and then allocates these expenses to TECO and other affiliates based on various allocation/assessment factors, and this resulted in 2023 Shared Service expense of $50.60 million[56] being allocated to TECO and $22.20 million allocated to other affiliates.[57]

The actual 2023 TECO Shared Services expense of $50.60 million and the related 2025 Budget expense of $51.90 million (reflected in TECO's revenue requirement) are the amounts that were subject to my review and related adjustments. For all four of my adjustments, I began with the 2025 Budget Shared Services expense balance of various departments subject to my adjustment and I applied revised allocation factors for Adjustment Nos. 2.1, 2.3, and 2.4. For Adjustment No. 2.3, I reduced the 2025 Budget Corporate Responsibility department costs by one-half after applying my revised MMM factor to this expense.

I do not agree with the 2025 Budget amount for each of the shared service department expenses, and if other OPC witnesses make rate case adjustments to these amounts then I will need to revise my calculations. Also, using the 2025 Budget amounts for purposes of my affiliate adjustments, was a compromise between TECO's increased level of affiliate expenses and the offsetting impact of my adjustments related

---

[56] The Total shared service expenses for 2020, 2021, 2022, and 2023 are from TECO's response to OPC Fifth Set of Interrogatories and PODs, Interrogatory No. 95 and POD No. 71, Excel spreadsheets tiled, "(BS 19213) Shared Services Schedule 2020.xlsx", and similar spreadsheets at BS 19214 (Shared Services for 2021), BS 19215 (Shared Services for 2022), BS 19216 (Shared Services for 2023). Total shared service expenses for the 2025 Budget are from TECO's response to OPC Second Set of Interrogatories and PODs, Interrogatory No. 63 and POD No. 39, Excel spreadsheet titled "(BS 17337) TEC SS Budget Schedule 2025.xlsx." Also, TECO's response to OPC Sixth Set of Interrogatories and PODs, Interrogatory No. 103 and POD No. 81, provided file POD_No._81 which included a spreadsheet titled, "(BS 19597) Shared Services Schedule 2023.xlsx.", which is the same Shared Services Schedule for 2023 that was provided in response to POD No. 71 as BS 19216 cited above in a request for Management Reports regarding affiliate transactions.

[57] TECO allocates Shared Services expenses to the other affiliates PGS, NMG, SeaCoast, TECO Partners, Inc., TECO Gemstone, Inc., and TECO Energy, Inc. – although not every type of Shared Service expense is allocated to each affiliate and different types of allocation factors impact the amounts allocated to all affiliates.

to allocation factors and other issues. Adjustment BCO-2 results in a total reduction in TECO Shared Services expense of $5.50 million with detailed calculations provided at Exhibit BCO-2, and I have summarized the four different types of adjustments below:

1) **<u>Adjustment BCO-2.1</u> –** TECO's MMM includes three equally weighted allocation factors of Net Income, Revenue, and Net Assets. I have removed the Net Income factor and replaced it with a 2023 Headcount factor and updated some of the remaining Revenues and Net Asset factors. For those 2023 TECO Shared Service expenses that I adjusted and which were allocated using the MMM, I have applied my revised MMM allocation factor percentage and reduced the related amount of Shared Service expenses allocated to TECO.

2) **<u>Adjustment BCO-2.2</u> –** First, I adjusted the 2025 Budget expenses for "Corporate Responsibility" and "Other Corporate" departments using my revised MMM allocation factor. Second, I disallowed 50% of this remaining expense after applying my revised MMM allocation factor. These total "Corporate Responsibility" department expenses represent the single largest department expense comprising TECO's actual 2023 and 2025 Budget Shared Service expenses. Also, TECO has not provided any supporting documentation to address these broad and undefined expenses. TECO has not provided any documentation to prove these corporate expenses are not duplicative of other corporate-type expenses or that they are not excessive. <u>Also, TECO's response to OPC's Fifth Set of Interrogatories and PODs, Interrogatory No. 95 and POD No. 71 provides</u>

<u>additional detailed information showing shared service allocated costs by expense categories of labor, outside services, employee expenses, and other. For the Corporate Responsibility expenses, an unusually significant amount of expenses were identified as "Other", including $9.60 million (64%) of the total $14.90 million that are subject to allocation to TECO and all affiliates. This emphasizes my concerns with these significant broad and vague corporate overhead/direct expenses because TECO has not disclosed or provided any important specific information about these expenses. I will continue my review, but if additional information is not available to validate these expenses then it may be reasonable to disallow all of these expenses.</u> Simply put, TECO failed to meet its burden to justify these costs.

3) **<u>Adjustment BCO-2.3</u> –** I revised and updated TECO's Headcount allocation factor for various 2025 Budget Human Resources department expenses, and this caused a reduction in the allocation factor and the related Human Resources expenses allocated to TECO.

4) **<u>Adjustment BCO-2.4</u> –** These 2025 Budget Procurement department shared service expenses are allocated to TECO using a "Purchase Order Spend" allocation factor. The total amount of Procurement department expenses have increased significantly in recent years along with the Purchase Order Spend allocation factor for TECO. Also, PGS has reduced its reliance on Procurement shared services by taking back some of these functions in-house. The combination of all these factors

has resulted in TECO incurring almost all Procurement expenses (among all other affiliates) in 2023 and for budgeted periods 2024 and 2025. In prior sections of my testimony, I explained the problems with excessive allocations of Procurement expense to TECO, and I will rely on those arguments without repeating them in this section of my testimony. Finally, I have substituted a more accurate and reasonable allocation factor to be applied to Procurement expense, and this "Net Plant Investment" allocation factor results in a reduction in Procurement expenses allocated to TECO.

Q. PLEASE EXPLAIN HOW THE MMM ALLOCATION FACTOR IS USED TO ALLOCATION TAMPA ELECTRIC SHARED SERVICE EXPENSES TO TECO AND AFFILIATES.

A. The MMM is a three-factor formula comprised of an equal weighting of three different factors/inputs which drive various Shared Service expenses to TECO and other affiliates as follows: [58]

1) Net Income – Net income after taxes and other income/expenses;
2) Operating Assets – Total operating assets less cash (and less goodwill and acquisition adjustment); and
3) Revenues – Total operating gross revenues.

The MMM that is used for allocating expenses to TECO and other affiliates in 2023 is illustrated in the table below. The MMM allocation method uses inputs that

[58] TECO Energy, Inc. CAM, effective January 1, 2020, p. 20. Per TECO's response to OPC's First Set of Interrogatories and PODs, Interrogatory No. 8 and POD No. 8, and also TECO's response to OPC's Second Set of Interrogatories and PODs, Interrogatory No. 58 and POD No. 34.

are one year in arrears, which means that Tampa Electric uses 2022 financial inputs/drivers in its MMM calculation that is used to allocate actual 2023 Shared Service expenses as illustrated in the table below.

Table 4
<u>TECO's MMM for 2023 Financial Period (With 2022 Inputs)</u>

	2022 Tampa Electric Company	2022 Peoples Gas System	2022 New Mexico Gas	2022 SeaCoast Gas Transmission	2022 Total
Actual as of 12/31/2022					
Total Revenues *	$ 2,522,891	$ 655,835	$ 577,923	$ 27,672	$ 3,784,321
Revenue	66.67%	17.33%	15.27%	0.73%	100.00%
Net Income **	$ 457,871	$ 82,238	$ 39,184	$ 16,299	$ 595,592
Net Income	76.88%	13.81%	6.58%	2.74%	100.01%
Operating Assets ***	$ 12,052,656	$2,467,333	$ 1,535,370	$ 191,362	$16,246,721
Operating Assets	74.19%	15.19%	9.45%	1.18%	100.01%
Blended Actual Rate	72.6%	15.4%	10.4%	1.6%	100.00%

The above MMM table shows the 2022 financial inputs for Revenue, Net Income, and Operating Assets for TECO and each applicable affiliate, and the percentage of each affiliate's financial input to the total financial input is calculated, such as TECO's 66.67% ($2,522,891) of Revenues compared to total Revenues for all affiliates ($3,784,321). For each affiliate, the percentages of all three financial inputs are averaged, and the average MMM factor of 72.60% is used to allocate expenses to TECO.

The MMM factor is applied as follows. For example, assume total Treasury department shared service hypothetical expenses of $5.0 million before allocation to any of the affiliates. TECO's 72.60% MMM factor is multiplied by the $5.0 million of total Treasury expenses, and the resulting Treasury expense of $3,630,000 is allocated to TECO, total Treasury expense of $5.0 million is also multiplied by the PGS MMM factor of 15.40% to allocate $770,000 to PGS' books, NMG is allocated $520,000 of Treasury expense ($5.0M x NMG MMM factor of 10.40%), and SeaCoast is allocated $80,000 of Treasury Expense ($5.0M x SeaCoast MMM factor of 1.60%).

Q. WHAT ARE YOUR CONCERNS WITH THE MMM AND RELATED FINANCIAL INPUTS USED TO ALLOCATE TAMPA ELECTRIC EXPENSES TO AFFILIATES?

A. I am not opposed to a three-factor MMM method that uses reasonable inputs. However, the original Massachusetts Method (which is not modified) uses the three financial inputs of: 1) Operating Revenue; 2) Payroll; and 3) Net Book Value of Tangible Capital Assets (plus Inventory). This means the MMM used in this proceeding is not really a "modified" Massachusetts Method because only one component (Revenues) from the original Massachusetts Method is used for allocating expenses. I consider the MMM used by Tampa Electric to be more of a "three-factor" allocation method, and it is not proven to be a reasonable surrogate of the Massachusetts Method. I am not contesting the MMM's two factor inputs of Revenues and Operating Assets. However, I have significant concerns regarding the Net Income input and I have substituted a Headcount input factor.

Q. WHAT ARE YOUR CONCERNS WITH THE NET INCOME ALLOCATION FACTOR?

A. My primary concerns with the Net Income allocation factor are discussed below.

1) No Cost Causation Link.

First, Net Income is a flawed allocation factor because there is no cost-causation link between Net Income and the Shared Services that are driven to various affiliates using this factor. There is no direct, indirect, or reasonable correlation between the size and variability of Net Income in relation to the Shared Service expenses that are allocated using the Net Income factor. In other words, if one particular affiliate has a high Net Income (or low Net Income), that does not mean that same affiliate has a corresponding high amount of Shared Service expenses, or does not mean that a particular affiliate should be allocated a corresponding higher amount of Shared Services based on its high Net Income.

There are many examples of companies that have a high Net Income and a low level of expenses, Net Income does not necessarily move in the same direction as expenses because there is no consistent, reasonable, or direct correlation. The MMM applied by Tampa Electric is flawed because the affiliate with the highest Net Income is allocated the highest amount of Shared Service expense. However, this approach is not even supported by common sense. If Company A has a higher Net Income than a comparable Company B, there is a reasonable likelihood that Company A has a higher Net Income because it is more efficient and has less expenses than Company B. There are many examples of publicly traded companies with a high Net Income, while having correspondingly low operating expenses.

2) <u>Net Income is Unduly Biased to Allocate Greater Costs to TECO For Recovery in Rate Case.</u>

Second, this Net Income factor is unduly biased and drives an unreasonably high level of Shared Services to TECO compared to other affiliates. TECO's Net Income allocation factor is the largest of its three allocation factors (and the largest among allocation factors of all other affiliates), with Net Income allocation factor of 76.88%, Operating Assets factor of 74.19%, and Revenue factor of 66.67%, resulting in a final weighted factor of 72.58%. The Net Income factor is arbitrary and unduly biased toward driving a greater amount of Shared Service expenses to TECO, which are then subject to recovery from customers in rate case proceedings. The Massachusetts Method does not use Net Income as an allocation factor because of the concerns that I have expressed.

3) <u>Not Supported by Industry Best Practices</u>.

Third, a Net Income allocation factor is not supported by industry best practices based on my experience. I am not aware that utility companies routinely or primarily use Net Income as an allocation factor to allocate expenses among affiliates. TECO has not provided any documentation showing that Net Income is a reasonable allocation factor and that it is commonly used by utilities to allocate expenses among affiliates.

4) <u>Not Supported by the Criteria in TECO's CAM.</u>

The TECO Energy, Inc. CAM that is effective for this rate case states that cost allocation factors (or drivers) should be based on the criteria of: 1) cost causative; 2) measurable; 3) objective; 4) stable or predictable; and 5) consistent and applicable.[59] The TECO Energy, Inc. CAM does not cite to or specifically state that the Net Income allocation factor meets all of these criteria. In fact, the Net Income factor fails to meet most of these criteria, in that it is not cost causative, it is not objective, it is not necessarily stable or predictable, and it is not consistent. While, I agree that Net Income is measurable, the Net Income allocation factor fails the test of a reasonable allocation factor by most criteria and it should not be adopted by the Commission in this proceeding.

Q. WHY DO YOU PROPOSE TO SUBSTITUTE A HEADCOUNT ALLOCATION FACTOR FOR THE NET INCOME ALLOCATION FACTOR?

A. Headcount is a reasonable allocation factor and should be used as the third MMM allocation factor. Arguably, Headcount is a better allocation factor than a "Payroll" factor, because a Payroll factor may include significant short and long-term incentive expenses, along with other types of costs that may be routinely disallowed by state regulatory agencies. The failure to account for these disallowed items can result in an incorrect and excessive allocation of costs to affiliates (resulting in excessive costs being recovered in rates from customers).

In fact, Headcount is the most prevalent allocation factor used by Tampa Electric (and TECO Energy, Inc.) to allocate Shared Services expense among TECO and other affiliates. TECO's Excel spreadsheet (POD No. 81) that shows Shared

[59] TECO Energy, Inc. CAM, effective January 1, 2020, p. 2. Per TECO's response to OPC's First Set of Interrogatories and PODs, Interrogatory No. 8 and POD No. 8, and also TECO's response to OPC's Second Set of Interrogatories and PODs, Interrogatory No. 58 and POD No. 34.

Services expenses allocated between TECO and all affiliates uses the Headcount factor to allocate costs to about 65 of the 86 total different departments – by far the most commonly used allocation factor. Although no allocation factor is perfect, I believe that a Headcount allocation factor is superior to a Net Income allocation factor, and TECO's predominant use of a Headcount factor supports my argument.

Q. DID YOU ALSO UPDATE THE MMM TO REFLECT MORE CURRENT ALLOCATION FACTORS (VERSUS TECO'S 2023 MMM THAT USES 2022 ALLOCATION FACTOR INPUTS)?

A. Yes. I used TECO's 2024 budgeted MMM Revenues for TECO and PGS, and I used the December 31, 2023, (per Annual Report) Revenues for NMG and SeaCoast because I did not have any other data available from an independent source. I used the December 31, 2023 (per Annual Report) Operating Asset amounts for TECO, PGS, NMG and SeaCoast.

Q. HOW DOES YOUR REVISED MMM COMPARE TO TECO'S MMM FOR 2023 AND 2025 BUDGET?

A. The table below compares the OPC and Company MMM allocation factor inputs and the total blended allocation factor. For illustrative purposes in the table, I used the Company's "2023" allocation factors, but because TECO adjusted its revenue requirement using its "2025 Budget" allocation factors, my actual affiliate expense adjustments begin with TECO's 2025 Budget allocation factors (and not its 2023 allocation factors). Although I compare my revised MMM allocation factor of 67.62%

(for TECO) to the Company's 2023 MMM allocation factor of 72.58% in the table below, the Company actually used a 72.07% for its 2025 Budget allocations. I have used the OPC-proposed blended allocation factor to revise the allocation of 2025 Budget Shared Service expenses to TECO in Adjustment BCO-2.1, as will be addressed next.

Table 5
Comparison of OPC and TECO's 2023 MMM Allocation Factors

	A	B	C	D	E	F	G
			Allocation Factor Percentages				
Ln	Parties	Factor	TECO	PGS	NMG	SeaCoast	Total
1	Ostrander/OPC	Revenues	67.93%	19.15%	12.20%	0.72%	100.00%
2	Ostrander/OPC	Headcount	62.40%	18.87%	17.50%	1.23%	100.00%
3	Ostrander/OPC	Assets	72.54%	18.90%	7.41%	1.16%	100.01%
4	Blended Allocation Factor		**67.62%**	**18.97%**	**12.37%**	**1.04%**	100.00%
5	TECO (2023 with 2022 inputs)	Revenues	66.67%	17.33%	15.27%	0.73%	100.00%
6	TECO (2023 with 2022 inputs)	Net Income	76.88%	13.81%	6.58%	2.84%	100.11%
7	TECO (2023 with 2022 inputs)	Assets	74.19%	15.19%	9.45%	1.18%	100.01%
8	Blended Allocation Factor		**72.58%**	**15.44%**	**10.43%**	**1.58%**	

Q. PLEASE EXPLAIN YOUR CALCULATION OF REMAINING ADJUSTMENTS BCO-2.2, BCO-2.3, and BCO-2.4.

This is a multi-part calculation with supporting detailed calculations shown at Exhibit BCO-2.

First, for Adjustments BCO-2.2, I used the total 2025 Budget expenses of $10.60 million for Corporate Responsibility Shared Service expense and applied my revised TECO MMM allocation factor of 67.62%, and this reduced the amount allocated to TECO from $7.70 million to $7.20 million, a reduction of $.50 million. Next, I disallowed 50% of the revised $7.20 million Corporate Responsibility expense, resulting in an adjustment of $3.60 million. If the Commission does not accept the

50% disallowance of Corporate Responsibility expenses, but accepts my revised MMM factor, this would be an expense reduction of $.50 million for this part of my adjustment.

Second, for Adjustment BCO-2.3, regarding certain Human Resource department expenses subject to a Headcount allocation factor, I revised TECO's Headcount allocation factor from 71.97% for the 2025 Budget (a factor of 71.51% was used by TECO for 2023) to my revised Headcount allocation factor of 61.70% to reflect updated and more reasonable allocation factors – and this reduced these Human Resource-related expenses by $.20 million (Adjustment BCO-2.3). This is more of a routine adjustment that does not need much explanation because it relies on actual updated headcount information instead of TECO's unsupported budgeted headcount.

Third, for Adjustment BCO-2.4, regarding certain Procurement department expenses subject to the "Purchase Order Spend" allocation factor, I revised TECO's Purchase Order Spend factor from 94.06% for the 2025 Budget (a factor of 89.40% was use by TECO for 2023) to my revised allocation factor of 74.43% based on the 2023 "Net Plant Investment" of each applicable affiliate. This reduced these Procurement-related expenses by $1.30 million (Adjustment BCO-2.4).

Q. PLEASE EXPLAIN YOUR CONCERNS REGARDING THE SUBSTANTIVE INCREASES IN PROCUREMENT EXPENSES AND ALLOCATION FACTORS FOR TECO BEGINNING IN 2023 RELATED TO ADJUSTMENT BCO-2.4.

A. First, I addressed my substantive concerns with the significant unsupported increases in the total and TECO-allocated amount of Procurement expenses (and related allocation factors) in a comprehensive manner[60] at "Section VII. Concerns with TECO as a Centralized Service Company", and I will not repeat all those concerns again at this section. The concerns that I addressed at Section VII are a significant factor in my adjustment of the Procurement allocation factor at this section. In addition, I explained how PGS reduced its reliance on Procurement shared services by taking back some of these functions in-house (and reducing its allocated expenses from Tampa Electric), although TECO has become saddled with almost all residual Procurement expenses because TECO has failed to responsibly control, or justify, these increasing levels of centralized service expenses.

Second, the primary concern is the substantive Procurement shared services allocation factor of 89.40% for 2023 and 94.06% for the 2025 Budget, which appears excessive when compared to almost any other shared service allocation factor applicable to TECO. This concern exists in part because the Procurement Purchase Order Spend allocation factor is not proven to be compliant with the TECO allocation factor criteria of: a) cost causative; b) measurable; c) objective; d) stable or predictable; and e) consistent and applicable. The Procurement Purchase Order Spend allocation factor of 89.40% for 2023 allocates $4.80 million of Procurement department expenses to TECO, and only allocates $43,000 to NMG and $525,000 to PGS.

To test the reasonableness of these relatively immaterial allocations to NMG and PGS, I determined the 2023 average annual payroll cost per TECO employee is

[60] I addressed my concerns in a comprehensive manner in about six pages.

between \$85,000 to \$97,000. I may be over-simplifying to some degree by treating the NGM and PGS Procurement allocated expenses of \$43,000 and \$525,000 as entirely payroll costs. However, with this assumption, this would mean that the NMG \$43,000 allocated Procurement expense is only equal to about one-half of one employee's salary for the 2023 year, and the PGS \$525,000 Procurement allocated expense is only equal to about six employees for the 2023 year.

Given that TECO was allocated \$4.8 million of Procurement expense in 2023, it does not appear reasonable that NGM and PGS could run their Procurement departments at these substantially reduced cost levels. I understand that PGS has taken back some Procurement functions in-house and PGS has a reduced reliance on Procurement shared service expenses. Since this is the case, then a more reasonable response would be for TECO to reduce its Procurement staffing and costs to reflect the take-back of Procurement functions by NMG and PGS – instead of requiring TECO to pick up all the residual costs of the Procurement department (that were previously incurred by NMG and PGS) via an increased allocation factor.

It is not reasonable for TECO to effectively pay above market-based competitive prices for Procurement services (resulting from the residual Procurement costs previously incurred by PGS that are now allocated to TECO). If both NMG and PGS took back some of these Procurement services in-house instead of paying for these centralized services, this may mean that TECO's prices for Procurement expense are excessive and not competitive with the market. This means that the undue shifting of these residual costs to TECO results in it being the guarantor for recovery of such excessive that may exceed competitive market prices for this service. This end result is unfairly beneficial to TECO and unfairly detrimental to customers, because TECO can recover these potential above-market Procurement costs from customers via the rate case process.

Q. WHY IS YOUR NET PLANT INVESTMENT ALLOCATION FACTOR BETTER THAN A PURCHASE ORDER SPEND ALLOCATION FACTOR?

A. The Procurement function should be responsible for purchasing and contracts related to both capitalized net plant investment and outside services (which could include expensed and capitalized amounts). Therefore, I believe that a Procurement allocation factor based on net plant investment for TECO (and each affiliate receiving this service) is a reasonable driver of these expenses. My net plant allocation factor for TECO of 74.43% is more consistent with TECO's other 2023 allocation factors such as the 2023 MMM factor of 72.58% and the headcount factor about 73%. I do not believe there should be a significant deviations in primary allocation factors unless TECO can prove a strong cost-causation link between the allocation factor and the cost that it is driving.

Q. DO YOU HAVE ADDITIONAL EXHIBITS ATTACHED TO YOUR TESTIMONY?

A. Yes, I do. I have Exhibit BCO-2 which contains the calculations that support my adjustments described earlier in my testimony. I also have Exhibit BCO-3 that is composed of the pertinent TECO discovery responses that informed my review and analysis.

Q. WILL YOU IDENTIFY THOSE CONCERNS AND MATTERS THAT REMAIN OPEN OR UNRESOLVED DUE TO OUTSTANDING INTERROGATORIES AND PODS, RECENTLY PROVIDED INFORMATION, (OR INFORMATION PENDING OR NOT PROVIDED FOR OTHER INTERROGATORIES AND PODS)?

A. I have a number of existing concerns that may need to be addressed via supplemental testimony, pending further supporting documentation that is necessary and is being obtained from TECO through current or pending data requests. I will identify some of the primary remaining concerns.

First, I have outstanding concerns regarding Mr. Chronister's deposition responses received May 24, 2024 in the form of late filed exhibits and related Excel spreadsheets. Because OPC has been preparing its prefiled direct testimony it has not had adequate time to fully evaluate all of these responses and data for their impact on this rate case. This information could impact adjustments to affiliate transactions.

For example, "LFE_No 2_Chronister_bates.pdf" and related "LFE 2 Excel files" provided information for the first time regarding the Modified Massachusetts Method allocation factors applicable to Emera. Even though OPC Interrogatory No. 62 and POD No. 38 requested all of the allocation factors and supporting documentation and calculations used to allocate costs to TECO. TECO's April 22, 2024, response to OPC's Second Set of Interrogatories and PODs, Interrogatory No. 62 and POD No. 38, included only objections, and has never provided any allocation factors subject to this Interrogatory and POD. However, TECO has provided allocation factor information in response to several other Interrogatories and PODs with information trickling in on a periodic basis. Although all of the allocation factor information should have been provided by April 22, 2024, in response to Interrogatory No. 62 and POD No. 38. TECO is still providing allocation factor information per the May 24, 2024, deposition information from Mr. Chronister. Thus, allocation factor information is still being provided by TECO over thirty days from the intended due date, and the current time constraints for filing direct testimony has not allowed OPC to adequate time to fully evaluate the deposition information from Mr. Chronister.

Second, there are also other concerns raised by Mr. Chronister's deposition that are part of continuing or new concerns that will require follow-up interrogatories and PODs, and which could impact affiliate transaction adjustments.

Third, as I identified in the body of my testimony, there are concerns that TECO has not provided the related underlying formal agreements (and any other supporting calculations and supporting documentation) between TECO and both Emera and Emera Services, Inc. regarding Emera's Corporate Support Service charges to TECO of $11.10 million and Emera Services, Inc. charges to TECO of a net negative amount of ($4.10 million). If additional information is not forthcoming, then it may be necessary to address these concerns by additional adjustments to affiliate transactions.

Fourth, as I identified in the body of my testimony, it was not clear from conflicting TECO responses to interrogatories whether the revenue requirement calculation reflects affiliate transaction expense using the: 1) December 31, 2023, balances with no TECO adjustments; or 2) 2025 Budget balances with updated adjusted balances. My testimony made adjustments to affiliate expenses from the 2025 Budget amounts, but if the December 31, 2023, balances were used it may be necessary to update and revise my affiliate expense adjustments.

Fifth, I have continuing concerns regarding the lack of documentation regarding Corporate Responsibility expenses, and this issue is subject to further review and adjustment.

Also, there are other Interrogatories and PODs that remain to be answered, and OPC may need to address these matters.

Q. DOES THE ABSENCE OF A COMMENT OR ADJUSTMENT REGARDING CERTAIN AFFILIATE ISSUES MEAN YOU AGREE WITH TECO'S POSITIONS ON THE MATTER?

A. No, just because I did not offer a comment or adjustment on certain other affiliate issues does not mean that I am in agreement with TECO's position on such matters. Further, I reserve my right to supplement my testimony upon receipt of pertinent discovery.

Q. DOES THIS COMPLETE YOUR PREFILED DIRECT TESTIMONY?

A. Yes, at this time. However, the compressed procedural schedule in this proceeding for filing Intervenor testimony has limited the time to complete OPC's investigation into the issues and effects of those issues on the Company's petition. Consequently, it is my understanding that OPC reserves the right to file supplemental testimony to fully address these issues and effects of those issues, if necessary.

Bion C. Ostrander – Curriculum Vitae

I am an independent regulatory consultant with forty-four years of total regulatory and accounting experience working for Certified Public Accounting (CPA) firms, regulatory agencies, and my regulatory consulting business, including thirty-two years as an independent consultant with my own firm. I have been providing continuous consulting services since 1990 and have addressed more than 250 cases in numerous U.S. and international jurisdictions.[1]

I have addressed a broad range of energy and telecom accounting and policy issues in my career, including rate case/revenue requirement accounting adjustments, CAM/EAM reviews, capital asset infrastructure/modernization, affordable rates/universal service, tariff design, models that calculate the levelized cost of electricity for renewable energy options (PV solar, wind, biogas, etc.) for purposes of setting feed-in/renewable energy rider tariffs, compensation, affiliate transactions, depreciation, merger/acquisitions, cross-subsidization, complex income tax issues, service quality, retail and wholesale cost studies, competition, and many others.

My experience is summarized below:

- ✓ **Bion C. Ostrander (dba Ostrander Consulting)**: Principal/Owner - October 1990 to current.
- ✓ **Kansas Corporation Commission**: Chief of Telecommunications – 1986-1990.
- ✓ **Kansas Corporation Commission**: Chief Auditor (gas, electric, telephone & transport.) – 1983-1986.
- ✓ **Mize Houser Mehlinger & Kimes (now Mize CPA, Inc.)**: Auditor in audit section of regional CPA firm – 1981-1983.
- ✓ **Deloitte Haskins and Sells (now Deloitte**): Auditor for international CPA firm – 1978-1981.

[1] Mr. Ostrander maintained a permit to practice as a CPA for most years he was providing consulting services, the permit was maintained primarily for credential purposes. However, because he no longer provides any attestation or related services that require a permit to practice, he no longer maintains the permit – although he retains membership in CPA organizations.

Client Summary	
Consumer Advocates/Attorney General	***Public Service Commissions***
District of Columbia - OPC	Arizona
Indiana UCC	Georgia
Florida OPC	Kansas
Kansas CURB	Maryland
Kentucky AG	Minnesota
Michigan AG	North Dakota
Maine OPA	Oklahoma
Maine AARP	***Other***
Maryland OPC	Alaska Competitive Local Exchange Carrier
Michigan AG	Maryland - Montgomery County
Minnesota DPS	Cities of Hampton & North Hampton - New Hampshire
Nevada AG	Virginia - CWA
New Hampshire OCA	Kansas Counties (911 implementation issues)
Ohio OCC	***International***
Oklahoma AG	Fair Trading Commission - Barbados
Utah OCS	Eastern Caribbean Telecomm. Authority (ECTEL -
Vermont DPS	St. Lucia, St. Kitts/Nevis, St. Vincent, Grenada, Dominica)
Washington AG	Armenia - USAID
Wyoming	Russia/Ukraine Energy Utility Training
	Saudi Arabia

Work History – Ostrander:

Bion C. Ostrander – Consulting Firm (1990 to present):

Principal

Mr. Ostrander principally addresses regulatory issues on behalf of governments and regulatory agencies, including U.S. and international regulatory agencies. Services include those related to revenue requirement issues, renewal energy issues, price caps or alternative regulation plans, competition assessment, costing/pricing, interconnection/local loop unbundling, universal service, management audits and other matters.

Kansas Corporation Commission (1983 – 1990):

Chief of Telecommunications

Supervised staff and directed all telecommunications-related matters including assessment of rate cases of SWBT, United/Sprint and rural LECs. Also, directed actions regarding alternative regulation plans, establishing access charge policy, transition to intrastate competition, depreciation filings, establishment of the Kansas Relay Center for speech and hearing impaired citizens in Kansas, filings with the FCC, billing standards, quality of service, consumer complaints, staff training and over one hundred docketed regulatory matters per year. Mr. Ostrander was the lead witness on all major telecommunications matters.

Chief Auditor

Directed rate cases of gas, electric and telecom companies prior to promotion to Chief of Telecommunications.

Mize, Houser, Mehlinger and Kimes:

Auditor – CPA firm

Performed auditing, tax and special projects for various industries.

Deloitte, Haskins and Sells – (International CPA/Audit Firm):

Auditor – CPA firm

Performed auditing, tax and special projects in industries such as utilities, savings and loan, manufacturing, retail, construction, real estate, insurance, banking and not-for-profit.

Education:

University of Kansas - B.S. Business Administration with a Major in Accounting, 1978.

	A	B		C	D
Ln	(In Millions) Tampa Electric Expenses Allocated to TECO	OPC/ Ostrander Adjs.		OPC Adj. No.	Exhibit BCO-2 Source
1	Remove certain costs related to dissolved affiliate	$	(858,561)	1	Sch. B
2	Revise MMM Allocation Factor	$	(411,226)	2.1	Sch. C
3	Remove One-Half of Corp. Responsibility Costs	$	(3,575,548)	2.2	Sch. C
4	Revise Human Resources Headcount Factor	$	(227,646)	2.3	Sch. C
5	Revise Procurement Factor to Net Plant Investment	$	(1,243,052)	2.4	Sch. C
6	**Total OPCAdjustments**	**$**	**(6,316,033)**		

Note 1: Adjustment BCO-2.2 does not include the revision of the MMM factor which is an additional reduction in expense of $470,606.00.

Ln	A Emera and Emera Services, Inc. Services	B Corporate Support Services	C Canada $ Actual 2023	D US $ Actual 2023	E TECO Budget 2025	F OPC Adjustment	G Source
1	Emera	Direct		$ 11,117,821	$ 11,075,000		(A), (D), (E), Note 2
2	Emera	TSI Allocated	$ 1,158,628	$ 858,561	Not provided	$ (858,561)	(B),(C), (E)
3	Emera	Allocated	$ 4,132,878	$ 3,062,525	Not provided		(B), (E)
4	Emera Services, Inc.	Direct		$ 4,134,342	$ 4,421,000		(B), Note 2
5	Total Direct and Allocated		$ 5,291,506	$ 19,173,249	$ 15,496,000		
6	Direct Charges Not Subject to Adjustment		$ -	$ 15,252,163	$ 15,496,000		
7	Allocated Charges Subject to Adjustment		$ 5,291,506	$ 3,921,086			
8	Ostrander/OPC Adjustment					**$ (858,561)**	

Note 1 - Although amounts at line 1 per POD No. 74 and line 4 per POD No. 74 are not Confidential, these amounts will be treated as Confidential to protect the actual Confidential amounts at lines 2 and 3 from being disclosed. Only the total amount of this adjustment will be made Publicly available.

Note 2 - Per TECO's response to OPC's Eighth Set of Interrogatories and Ninth Set of PODs, Interrogatory No. 156 and POD No. 119 (and according to other Interrogatories and PODs), direct expenses are charged via an Accounts Receivable entry and no amounts impact TECO's expenses, so no adjustments will be proposed for Direct Expenses shown in the table above.

Source:

(A) - POD No. 74 , also noted as "OPC_Affiliate_Purchase by FERC file (BS 28786)."

(B) - The actual 2023 balance was provided per TECO's response to OPC's Second Set of Interrogatories and PODs, Public Interrogatory No. 61 and Confidential POD No. 37, and POD No. 37 is provided in Canadian currency only. Folder "CONF_POD_2-37" includes four Excel spreadsheets for years 2021 to 2023, plus 2021-2023 summary, titled "(BS 16844) Emera Affilate Allocations - Annual Summary 2021_Highlighted.xlsx", "(BS 16845) Emera Affiliate Allocations - Annual Summary 2022_Highlighted.xlsx", "(BS 16846) Emera Affiliate Allocations - Annual Summary 2023_Highlighted.xlsx", "(BS 16847) Emera Affiliate Allocations - Detailed Total 2021-2023_Highlighted.xlsx". TECO did not provide any information for 2024 Budget and 2025 Budget amounts. POD No. 37 did not provide 2024 Budget or 2025 Budget amounts, and budgeted amounts for Emera, Inc. Corporate Support charges to TECO could not be located or identified. The reconciliation at Confidential IRR 11-179 is the first time that TECO has determined and stated that the $4.10M of allocations in CAN currency, were incorrectly shown as US Currency in POD 5-74 (over a month after the original response).

(D) - No supporting documentation was provided for these charges, no calculations and none of the related agreements were provided.

(E) - The TECO reconciliation from Canada to US currency for 2023 amounts is at Confidential IRR 11-179 & Public POD 11-138 was provided May 23, 2024. The Excel spreadsheet POD 11-138 is not Confidential, but the detailed written explanation of the spreadsheet at related IRR 11-179 is considered Confidential.

Allocation Factor Adjustments

	A	B	C	D	E	F	G	H	I	J	K	
Ln	Description	TECO 2025 Budget Allocation Factor	Actual 2023 TECO Allocation Factor	Ostrander Revised Allocation Factor	TECO 2025 Budget Allocated to All Affiliates	TECO 2025 Budget Allocated to TECO	Actual 2023 Allocated to All Affiliates	Actual 2023 Allocated to TECO	OPC 2023 Allocated using OPC MMM for 2023	OPC Allocated to TECO Using 2025 Budget & Revised Factors	**OPC Adjustment BCO-2**	Source/ Notes
1	Source and Notes	A	A	C	B	B	A	A			Note 1	
2												
3	Total Tampa Electric Expenses Allocated to All											
4	Affiliates and Portion Allocated to TECO at: 1) actual											
5	December 31, 2023 books; and 2) per 2025 Budget				$ 74,096,006	$ 51,780,896	$ 72,795,847	$ 50,610,757				
6												
7	**TECO Corporate Responsibility Overhead Costs Allocated Using the Revised OPC/Ostrander MMM, with 50% Disallowed:**											
8	**Corporate Responsibility**	72.07%	72.60%	67.62%	$ 10,575,415	$ 7,621,702	$ 14,878,104	$ 10,798,528	$ 10,060,574			
9	**Other Corporate**	72.07%	72.60%	67.62%			$ 169,249	$ 122,841	$ 114,446			
10	Total Corporate Overhead				**$ 10,575,415**	$ 7,621,702	**$ 15,047,353**	$ 10,921,369	$ 10,175,020	$ 7,151,096	**$ (470,606)**	Note 1
11	Disallow 50% of Corporate Overhead									0.5		
12	Corporate Responsibility OPC Adjustment									**$ (3,575,548)**	**$ (3,575,548)**	
13												
14	**Other TECO Department Expenses Allocated using the Modified Massachusetts Method for 2023 and 2025 Budget, Using the Revised OPC/Ostrander MMM:**											
15	Legal - VP General Counsel	72.07%	72.60%	67.62%	$ 806,244	$ 581,060	$ 556,861	$ 404,170	$ 376,549	$ 545,182	$ (35,878)	
16	Legal - Corporate Secretary	72.07%	72.60%	67.62%	$ 124,931	$ 90,038	$ 99,181	$ 71,986	$ 67,066	$ 84,478	$ (5,560)	
17	Legal - Legal Services	72.07%	72.60%	67.62%	$ 786,970	$ 567,169	$ 631,952	$ 458,671	$ 427,326	$ 532,149	$ (35,020)	
18	Legal - Compliance	72.07%	72.60%	67.62%	$ 715,709	$ 515,812	$ 602,461	$ 437,266	$ 407,384	$ 483,962	$ (31,850)	
19	State Comm. Affairs	72.07%	72.60%	67.62%	$ 116,761	$ 84,150	$ 127,403	$ 92,469	$ 86,150	$ 78,954	$ (5,196)	
20	Finance - Insurance Risk	72.07%	72.60%	67.62%	$ 210,846	$ 151,957	$ 162,613	$ 118,024	$ 109,959	$ 142,574	$ (9,383)	
21	Finance - Treasurey	72.07%	72.60%	67.62%	$ 518,210	$ 373,474	$ 487,334	$ 353,707	$ 329,535	$ 350,414	$ (23,060)	
22	Finance - Corporate Tax	72.07%	72.60%	67.62%	$ 427,769	$ 308,293	$ 340,836	$ 247,379	$ 230,473	$ 289,257	$ (19,036)	
23	Finance - Corporate Accounting	72.07%	72.60%	67.62%	$ 2,882,919	$ 2,077,720	$ 2,595,866	$ 1,884,080	$ 1,755,325	$ 1,949,430	$ (128,290)	
24	Finance - Audit Services	72.07%	72.60%	67.62%	$ 1,483,553	$ 1,069,197	$ 1,435,306	$ 1,041,745	$ 970,554	$ 1,003,179	$ (66,018)	
25	Finance - Pensions	72.07%	72.60%	67.62%	$ 264,302	$ 190,483	$ 427,697	$ 310,423	$ 289,209	$ 178,721	$ (11,762)	
26	Finance - Plan & Budgets	72.07%	72.60%	67.62%	$ 902,771	$ 650,627	$ 736,661	$ 534,669	$ 498,130	$ 610,454	$ (40,173)	
27	**OPC/Ostrander Adjustment**	72.07%	72.60%	67.62%	$ 9,240,985	$ 6,659,980	$ 8,204,171	$ 5,954,589	$ 5,547,660	$ 6,248,754	**$ (411,226)**	
28												
29	**TECO Human Resource Department Expenses Adjusted Using OPC/Ostrander Revised TECO Headcount Factor:**											
30												
31	HR Ben. Admin.	71.97%	71.51%	61.70%	$ 1,255,645	$ 903,688	$ 1,440,696	$ 1,030,242	$ 888,909	$ 774,733	$ (128,955)	
32	HR Comp.	71.97%	71.51%	61.70%	$ 452,097	$ 325,374	$ 366,924	$ 262,387	$ 226,392	$ 278,944	$ (46,430)	
33	HR HRIS	71.97%	71.51%	61.70%	$ 508,878	$ 366,239	$ 398,356	$ 284,864	$ 245,786	$ 313,978	$ (52,261)	
34											**$ (227,646)**	
35												
36	**TECO Procurement Department Expenses Adjusted Using OPC/Ostrander "Net Plant Investment" Factor Instead of TECO's "Purchase Order Spend" Allocation Factor:**											
37	Admin.	94.06%	89.40%	74.43%	$ 814,660	$ 766,269	$ 709,347	$ 634,156	$ 527,967	$ 606,351	$ (159,918)	
38	Purchases & Inv. Man.	94.06%	89.40%	74.43%	$ 1,657,614	$ 1,559,151	$ 1,313,626	$ 1,174,382	$ 977,732	$ 1,233,762	$ (325,389)	
39	Supplier Diversity	94.06%	89.40%	74.43%	$ 564,232	$ 530,717	$ 506,881	$ 453,151	$ 377,272	$ 419,958	$ (110,759)	
40	Contract Admin.	94.06%	89.40%	74.43%	$ 3,295,906	$ 3,100,129	$ 2,892,285	$ 2,585,703	$ 2,152,728	$ 2,453,143	$ (646,986)	
41									$ 4,035,698	$ 4,713,214	$ (1,243,052)	
42												
43	**OPC Adjustment BCO-2**										**$ (5,457,472)**	

Note 1 - OPC Adjustment BCO-2 is conservative because it does not currently include the $470,606 portion of the adjustment.

Source:

(A) - The Total shared service expenses for 2020, 2021, 2022, and 2023 are from TECO’s response to OPC Fifth Set of Interrogatories and PODs, Interrogatory No. 95 and POD No. 71, Excel spreadsheets tiled, “(BS 19213) Shared Services Schedule 2020.xlsx”, and similar spreadsheets at BS 19214 (Shared Services for 2021), BS 19215 (Shared Services for 2022), BS 19216 (Shared Services for 2023). The type of allocation factor is identified for each department (expense line item) at this interrogatory. Also, the allocation factor for each department expense used in this spreadsheet can be determined by dividing the TECO allocated expense (or any affiliate's allocated expense) by the total allocable expense before allocation. Other interrogatory responses also provide allocation factors for the various departments but the actual allocation factor percentage used POD No. 71 is the best source to confirm the actual allocation factor percentage.

(B) - Total shared service expenses for the 2025 Budget are from TECO’s response to OPC Second Set of Interrogatories and PODs, Interrogatory No. 63 and POD No. 39, Excel spreadsheet titled “(BS 17337) TEC SS Budget Schedule 2025.xlsx.” Also, TECO’s response to OPC Sixth Set of Interrogatories and PODs, Interrogatory No. 103 and POD No. 81, provided file POD_No._81 which included a spreadsheet titled, “(BS 19597) Shared Services Schedule 2023.xlsx.”, which is the same Shared Services Schedule for 2023 that was provided in response to POD No. 71 as BS 19216 cited above in a request for Management Reports regarding affiliate transactions.

(C) - OPC/Ostrander revised MMM Allocation factor per Exhibit BCO-2, Schedule D.
(C) - OPC/Ostrander substituted its "New Plant Allocation" Factor for TECO's "Purchase Order Spend" Allocation factor per Exhibit BCO-2, Schedule E.

OPC/Ostrander MMM Factor	Tampa Electric Company		Peoples Gas System		New Mexico Gas		SeaCoast Gas Transmission		Total
Total Revenues	$ 2,727,477	(a)	$ 768,936	(d)	$ 489,715	(g)	$ 29,016	(j)	$ 4,015,144
Revenue (A)	67.93%		19.15%		12.20%		0.72%		100.00%
	TECO 2024 Budget		TECO 2024 Budget		Dec. 31, 2023		Dec. 31, 2023		
Used greater of Dec. 31, 2023, Annual Report or TECO 2024 Budget from MMM workpapers to be conservative									
Headcount (Note 1) (B)	2,539	(b)	768	(e)	712	(h)	50		4,069
	62.40%		18.87%		17.50%		1.23%		100.00%
Operating Assets (C)	$ 11,825,162	(c)	$ 3,080,556	(f)	$ 1,207,677	(i)	$ 188,316		$ 16,301,711
	72.54%		18.90%		7.41%		1.16%		100.00%
OPC/Ostrander Revised MMM Rate	**67.62%**		**18.97%**		**12.37%**		**1.04%**		**100.00%**
	To Sch. C								
TECO MMM Rate - 2023	72.58%		15.44%		10.43%		1.55%		100.00%
OPC/Ostrander Reduction from TECO Rate	-4.96%		3.53%		1.94%		-0.51%		

Note 1 - TECO's headcount factors used in other allocations all fail to include SeaCoast Headcount (and incorporation of TECO Pipeline Holdings that was absorbed by SeaCoast in 2023.

Source:

(A) - Revenues based on the greater of the actual December 31, 2023 Annual Report or TECO's 2024 budgeted revenues from TECO's MMM workpapers.

(B) - 2023 Annual Reports of TECO, PGS, NMG and SeaCoast are available at the Florida Commission website except NMG is from the New Mexico Commission website.

OPC/Ostrander headcount based on the greater of 4th quarter average of 2023 or Dec. 31, 2023 at Annual Report

NMG and SeaCoast 2023 Annual Reports do not have Headcount, so 2023 Factors from TECO workpaper used.

TECO 2023 Annual Report Source (a) - BS 19530, (b) - BS 19545, and (c) - 19547 - BS pages of TECO 2023 Annual Report.

PGS 2023 Annual Report Source (d) - page 8, (e) - page 9, and (f) - page 6.

NMG 2023 Annual Report Source (g) - Note 4 to Financial Statements, (h) - Sch. 114, and (i) - Sch. 114.

SeaCoast 2023 Annual Report Source (j), information not available for SeaCoast headcount or operating assets.

NMG and SeaCoast 2023 Annual Reports do not have Headcount, so 2023 Factors from TECO workpaper used.

(C) - Operating assets per December 31, 2023, Annual Reports, with pages cited above.

Description	**TECO**	**PGS**	**NMG**	**SeaCoast**	**Total**
Net Plant Investment	$ 9,969,554,197	$ 2,356,418,188	$ 988,757,508	$ 79,416,899	$ 13,394,146,792
Percentage	74.43%	17.59%	7.38%	0.59%	100.00%
	To Exh. BCO-2, Sch. C				

The purpose of this schedule is to calculate a "Net Plant Investment Factor" tallocation factor to replace TECO's "Purchase Order Spend" to be used in allocating Procurement expenses from Tampa Electric/TECO to TECO.

Source:
The 2023 Annual Reports of TECO, PGS, NMG, and SeaCoast.
The 2023 Annual Reports of TECO, PGS, NMG and SeaCoast are available at the Florida Commission website,
except NMG is from the New Mexico Commission website.

FERC WAIVER

169 FERC ¶ 61,081
UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Neil Chatterjee, Chairman;
Richard Glick and Bernard L. McNamee.

Tampa Electric Company Docket No. ER19-2439-000

ORDER ON REQUEST FOR WAIVER OF AFFILIATE PRICING RULES

(Issued October 30, 2019)

1. On July 23, 2019, as supplemented on September 18, 2019, Tampa Electric Company (Tampa) filed a request for waiver of sections 35.44(b)(1)[1] and 35.39(e)(1)[2] of the Commission's regulations to permit Tampa to provide non-power goods and services to non-utility affiliates and/or market-regulated power sales affiliates at cost, rather than at the higher of cost or market price. In this order, we grant the requested waiver, effective January 1, 2020, as requested.

I. Background

2. Tampa states that it is a franchised public utility operating within the state of Florida. Tampa explains that it has two business segments: its Tampa Electric division, engaged in the generation, purchase, transmission, distribution and wholesale and retail sale of electric energy, and Peoples Gas System, engaged in the exploration for or production of natural gas.

[1] 18 C.F.R. § 35.44(b)(1) (2019) ("Unless otherwise permitted by Commission rule or order, and except as permitted by paragraph (b)(4) of this section, sales of any non-power goods or services by a franchised public utility that has captive customers or that owns or provides transmission service over jurisdictional transmission facilities, including sales made to or through its affiliated exempt wholesale generators or qualifying facilities, to a market-regulated power sales affiliate or non-utility affiliate must be at the higher of cost or market price.").

[2] 18 C.F.R. § 35.39(e)(1) (2019) ("Unless otherwise permitted by Commission rule or order, sales of any non-power goods or services by a franchised public utility with captive customers, to a market-regulated power sales affiliate must be at the higher of cost or market price.").

3. Tampa states that its Tampa Electric division owns approximately 6,121 megawatts (MW) of generation. Tampa further states that open access to its Tampa Electric division transmission system is provided pursuant to the company's Open Access Transmission Tariff.[3]

4. On October 18, 2013, Tampa's parent company TECO Energy, Inc. (TECO) established TECO Services, Inc. (TECO Services) as a centralized service company within the TECO holding company system in anticipation of TECO's acquisition of New Mexico Gas Company. As a result of the transaction, TECO and its subsidiaries, including Tampa, could no longer rely on the single-state holding company exemption from the Commission's affiliate pricing regulations.[4] Effective January 1, 2015, Tampa transferred to TECO Services the bulk of the non-power goods and services that Tampa had historically provided to its affiliates at cost.[5]

5. Effective January 1, 2020, TECO intends to engage in a corporate reorganization in which TECO Services will be dissolved and the non-power goods and services it provided it will be transferred to and thereafter provided by Tampa. According to Tampa, TECO and Tampa are undertaking this reorganization in order to simplify their collective corporate structure, and thereby reduce overhead and capture efficiency benefits associated with housing the provision of non-power goods and services within the TECO family under "one roof."[6]

6. Tampa states that the following non-power goods and services currently being provided to affiliates will be transferred from TECO Services to Tampa: financial reporting and corporate accounting; insurance risk management; energy risk

[3] *Tampa Electric Co.*, Docket No. ER10-1508-000 (August 12, 2010) (delegated order).

[4] 18 C.F.R. § 35.44(b)(4) (permitting a company in a single-state holding company to provide general administrative and management non-power goods and services to, or receive such goods and services from, other companies in the same holding company system, at cost, provided that the only parties to such transactions are affiliates or associate companies of a holding company in the holding company system).

[5] TECO and Tampa sought waiver of 18 C.F.R. § 35.44(b)(1) effective with the January 1, 2015 transition of TECO from a single-state to a multi-state holding company so that it could continue to sell certain non-power goods and services to affiliates at cost, which the Commission granted. *TECO Energy, Inc.*, 149 FERC ¶ 61,294 (2014) (2014 Waiver Order).

[6] Tampa July 23, 2019 Filing at 5.

.

management; corporate audit/ethics and compliance; corporate safety; treasury; legal; claims; governmental affairs; corporate taxes; information technology; human resources; employee benefits; procurement; corporate communications; accounts payable; and corporate security and emergency management.[7] Tampa states that it will provide these non-power goods and services only to affiliates and not to any third parties except as may be necessary as part of providing transition services in the event of a divestiture of any part of TECO's current business.[8] As a result, Tampa explains that it is not forgoing profits by providing non-power goods and services to affiliates at cost.

7. In addition, Tampa states that its sales of non-power services to affiliates are, and will continue to be, subject to Florida Public Service Commission (Florida Commission) oversight following the transition of the TECO Services non-power goods and services to Tampa. Tampa explains that this oversight expressly includes non-power services and requires an annual report to the Florida Commission detailing inter-affiliate transactions. Tampa also states that the Florida Commission routinely audits Tampa and, during rate cases, undertakes a full review of its cost-allocation procedures.[9] Tampa further explains that it will maintain rigorous accounting and cost-allocation procedures for the purpose of determining the costs of non-power goods and services provided to affiliates, specifically those procedures currently used by TECO Services.

8. In response to questions from Commission staff, Tampa filed a supplement to its July 23, 2019 filing. Tampa explains that, subsequent to the 2014 Waiver Order, on July 1, 2016, it was indirectly acquired by Emera Inc. (Emera) and, shortly thereafter, began selling certain non-power goods and services to some of its new affiliates within the Emera system. Tampa states that these sales were priced at cost consistent with the 2014 Waiver Order. Tampa notes that it filed a notice of change in status pursuant to section 35.42(a)(2) of the Commission's regulations but, in that filing, failed to reference the 2014 Waiver Order. Tampa requests that, to the extent necessary, its notice of change in status be considered amended by the present filing to satisfy the notice of change in circumstances requirements of the 2014 Waiver Order. Tampa also clarifies that it

[7] *Id.* at 5-6.

[8] Tampa states that, on occasion, when TECO has divested a subsidiary, the goods or services formerly provided to the divested affiliate have been offered to the affiliate's purchaser, under a separate contract, for a limited transitional period (typically, three to six months). Tampa states that these transitional services are provided at cost, and are confined to what is needed for the transition, within the scope of what had been provided to the former affiliate before the divestiture. Tampa states that these types of transition arrangements are common during the divestiture of affiliated entities. *Id.* at 11 & n.36.

[9] *Id.* at 10-11.

requests waiver of section 35.39(e)(1), which contains an affiliate transaction pricing rule similar to, but more narrow than, the affiliate transaction pricing rule in section 35.44(b)(1).[10]

II. Notice of Filing

9. Notice of Tampa's July 23, 2019 filing was published in the *Federal Register*, 84 Fed. Reg. 36,909 (2019), with interventions and protests due on or before August 13, 2019. None was filed.

10. Notice of Tampa's September 18, 2019 supplement was published in the *Federal Register*, 84 Fed. Reg. 51,535 (2019), with interventions and protests due on or before September 30, 2019. None was filed.

III. Discussion

11. The Commission's pricing rules for affiliate transactions provide that unless otherwise permitted by Commission rule or order, the sale of non-power goods or services to a market-regulated power sales affiliate or a non-utility affiliate from a franchised public utility that has captive customers or that owns or provides transmission service over jurisdictional transmission facilities "must be at the higher of cost or market price."[11] The Commission's regulations further specify that a company in a single-state holding company system may provide or receive such non-power goods and services from its affiliates at cost.[12] In Order No. 707-A, the Commission stated it would "consider requests for waiver on a case-by-case basis for at-cost pricing in the multi-state context, under the same circumstances as for single state holding companies (i.e., only for general and administrative services and the goods to support those services and only where members of the holding company do not sell such goods and services outside the holding company)."[13]

12. Based on the information Tampa has provided, we grant the requested waiver of sections 35.44(b)(1) and 35.39(e)(1). Tampa requires waiver because it cannot provide

[10] Tampa September 18, 2019 Supplement at 1-2. Tampa explains that section 35.39(e)(1) does not encompass sales to non-utility affiliates, whereas the affiliate transaction pricing rule in section 35.44(b)(1) does. *Id.* at n.6.

[11] 18 C.F.R. § 35.44(b)(1); *see also id.* § 35.39(e)(1).

[12] 18 C.F.R. § 35.44(b)(4).

[13] *Cross-Subsidization Restrictions on Affiliate Transactions*, Order No. 707, 122 FERC ¶ 61,155, *order on reh'g*, Order No. 707-A, 124 FERC ¶ 61,047, at P 28 (2008).

non-power goods and services to market-regulated power sales affiliates and/or non-utility affiliates at cost without potentially violating sections 35.44(b)(1) and 35.39(e)(1). Based on Tampa's representations, we find that granting the request for waiver will not result in inappropriate cross-subsidization. As Tampa notes, it does not provide non-power goods and services to non-affiliates, except on a limited basis. Thus, Tampa is not forgoing profits by providing non-power goods and services to affiliates at cost and it states that any attempt to determine a market price for these goods and services would be speculative. Tampa commits to maintain the rigorous accounting and cost-allocation procedures currently used by TECO Services to determine the costs of non-power goods and services provided to affiliates. Additionally, we note that Tampa is a franchised public utility subject to the regulation and oversight of the Florida Commission, including the Florida Commission's oversight of inter-affiliate transactions and its ability to audit and undertake a full review of Tampa's cost-allocation procedures.

13. Our decision is based on Tampa maintaining its current cost allocation methodology. Tampa shall inform the Commission should there be a material change to that methodology. Further, we will rely on the Commission's ratemaking review process and audit functions, as well as the Commission's ability to access Tampa's books and records, to ensure that costs are allocated appropriately and that no inappropriate cross-subsidization is occurring.

14. In addition, we direct Tampa to submit a compliance filing, within 30 days of the date of this order, revising its market-based rate tariff to list the specific, limited waiver granted herein and to include a citation to this order.[14]

15. Finally, we note that the waiver granted herein is based on the specific facts and representations made by Tampa. To the extent that there is any material change in circumstances that would reflect a departure from the facts and representations that we have relied upon in granting the requested waivers, Tampa will be required to inform the Commission within 30 days of any such change.[15]

[14] *Market-Based Rates for Wholesale Sales of Electric Energy, Capacity and Ancillary Services by Public Utilities,* Order No. 697, 119 FERC ¶ 61,295, at App. C, *clarified*, 121 FERC ¶ 61,260 (2007*), order on reh'g*, Order No. 697-A, 123 FERC ¶ 61,055, at P 384, *clarified*, 124 FERC ¶ 61,055, *order on reh'g*, Order No. 697-B, 125 FERC ¶ 61,326 (2008), *order on reh'g*, Order No. 697-C, 127 FERC ¶ 61,284 (2009), *order on reh'g*, Order No. 697-D, 130 FERC ¶ 61,206 (2010), *aff'd sub nom. Mont. Consumer Counsel v. FERC*, 659 F.3d 910 (9th Cir. 2011), *cert. denied sub nom. Pub. Citizen*, *Inc. v. FERC*, 567 U.S. 934 (2012).

[15] We note that the purchases and sales to Emera affiliates disclosed in Tampa's September 18, 2019 supplement were a material change in circumstances that reflects a

The Commission orders:

(A) Tampa's request for waiver of the affiliate restrictions under sections 35.44(b)(1) and 35.39(e)(1) is hereby granted for the transactions identified in the body of this order, as discussed in the body of this order.

(B) Tampa must inform the Commission within 30 days of any material change in circumstances that would reflect a departure from the facts, policies, and procedures the Commission relied upon in granting the waiver herein, as discussed in the body of this order.

(C) Tampa is hereby directed to submit a compliance filing, within 30 days of this order, as discussed in the body of this order.

By the Commission.

(S E A L)

Nathaniel J. Davis, Sr.,
Deputy Secretary.

departure from the facts and representations that the Commission relied upon in granting waiver in the 2014 Waiver Order. Although we acknowledge that Tampa reflected its affiliation with Emera in an August 1, 2016 notice of change in status, it did not make a similar filing for the docket in which the Commission issued the 2014 Waiver Order. We remind Tampa that it must submit required filings on a timely basis, or it may face possible sanctions by the Commission.

FERC RULES

sales of ancillary services or may propose mitigation tailored to its own particular circumstances to eliminate its ability to exercise market power. Mitigation will apply only to the market(s) in which the Seller is found, or presumed, to have market power.

(b) Default mitigation for sales of energy or capacity consists of three distinct products:

(1) Sales of power of one week or less priced at the Seller's incremental cost plus a 10 percent adder;

(2) Sales of power of more than one week but less than one year priced at no higher than a cost-based ceiling reflecting the costs of the unit(s) expected to provide the service; and

(3) New contracts filed for review under section 205 of the Federal Power Act for sales of power for one year or more priced at a rate not to exceed embedded cost of service.

(c) Default mitigation for sales of ancillary services consist of: (1) A cap based on the relevant OATT ancillary service rate of the purchasing transmission operator; or (2) the results of a competitive solicitation that meets the Commission's requirements for transparency, definition, evaluation, and competitiveness.

[Order 697, 72 FR 40038, July 20, 2007, as amended by Order 784, 78 FR 46210, July 30, 2013]

§ 35.39 Affiliate restrictions.

(a) *General affiliate provisions.* As a condition of obtaining and retaining market-based rate authority, the conditions provided in this section, including the restriction on affiliate sales of electric energy and all other affiliate provisions, must be satisfied on an ongoing basis, unless otherwise authorized by Commission rule or order. Failure to satisfy these conditions will constitute a violation of the Seller's market-based rate tariff.

(b) *Restriction on affiliate sales of electric energy or capacity.* As a condition of obtaining and retaining market-based rate authority, no wholesale sale of electric energy or capacity may be made between a franchised public utility with captive customers and a market-regulated power sales affiliate without first receiving Commission authorization for the transaction under section 205 of the Federal Power Act. All authorizations to engage in affiliate wholesale sales of electric energy or capacity must be listed in a Seller's market-based rate tariff.

(c) *Separation of functions.* (1) For the purpose of this paragraph, entities acting on behalf of and for the benefit of a franchised public utility with captive customers (such as entities controlling or marketing power from the electrical generation assets of the franchised public utility) are considered part of the franchised public utility. Entities acting on behalf of and for the benefit of the market-regulated power sales affiliates of a franchised public utility with captive customers are considered part of the market-regulated power sales affiliates.

(2) (i) To the maximum extent practical, the employees of a market-regulated power sales affiliate must operate separately from the employees of any affiliated franchised public utility with captive customers.

(ii) Franchised public utilities with captive customers are permitted to share support employees, and field and maintenance employees with their market-regulated power sales affiliates. Franchised public utilities with captive customers are also permitted to share senior officers and boards of directors with their market-regulated power sales affiliates; provided, however, that the shared officers and boards of directors must not participate in directing, organizing or executing generation or market functions.

(iii) Notwithstanding any other restrictions in this section, in emergency circumstances affecting system reliability, a market-regulated power sales affiliate and a franchised public utility with captive customers may take steps necessary to keep the bulk power system in operation. A franchised public utility with captive customers or the market-regulated power sales affiliate must report to the Commission and disclose to the public on its Web site, each emergency that resulted in any deviation from the restrictions of section 35.39, within 24 hours of such deviation.

(d) *Information sharing*. (1) A franchised public utility with captive customers may not share market information with a market-regulated power sales affiliate if the sharing could be used to the detriment of captive customers, unless simultaneously disclosed to the public.

(2) Permissibly shared support employees, field and maintenance employees and senior officers and board of directors under §§ 35.39(c)(2)(ii) may have access to information covered by the prohibition of § 35.39(d)(1), subject to the no-conduit provision in § 35.39(g).

(e) *Non-power goods or services*. (1) Unless otherwise permitted by Commission rule or order, sales of any non-power goods or services by a franchised public utility with captive customers, to a market-regulated power sales affiliate must be at the higher of cost or market price.

(2) Unless otherwise permitted by Commission rule or order, sales of any non-power goods or services by a market-regulated power sales affiliate to an affiliated franchised public utility with captive customers may not be at a price above market.

(f) *Brokering of power*. (1) Unless otherwise permitted by Commission rule or order, to the extent a market-regulated power sales affiliate seeks to broker power for an affiliated franchised public utility with captive customers:

(i) The market-regulated power sales affiliate must offer the franchised public utility's power first;

(ii) The arrangement between the market-regulated power sales affiliate and the franchised public utility must be non-exclusive; and

(iii) The market-regulated power sales affiliate may not accept any fees in conjunction with any brokering services it performs for an affiliated franchised public utility.

(2) Unless otherwise permitted by Commission rule or order, to the extent a franchised public utility with captive customers seeks to broker power for a market-regulated power sales affiliate:

(i) The franchised public utility must charge the higher of its costs for the service or the market price for such services;

(ii) The franchised public utility must market its own power first, and simultaneously make public (on the Internet) any market information shared with its affiliate during the brokering; and

(iii) The franchised public utility must post on the Internet the actual brokering charges imposed.

(g) *No conduit provision*. A franchised public utility with captive customers and a market-regulated power sales affiliate are prohibited from using anyone, including asset managers, as a conduit to circumvent the affiliate restrictions in §§ 35.39(a) through (g).

(h) *Franchised utilities without captive customers*. If necessary, any affiliate restrictions regarding separation of functions, power sales or non-power goods and services transactions, or brokering involving two or more franchised public utilities, one or more of whom has captive customers and one or more of whom does not have captive customers, will be imposed on a case-by-case basis.

[Order 697, 72 FR 40038, July 20, 2007, as amended by Order 697–A, 73 FR 25912, May 7, 2008]

§ 35.40 Ancillary services.

A Seller may make sales of ancillary services at market-based rates only if it has been authorized by the Commission and only in specific geographic markets as the Commission has authorized.

§ 35.41 Market behavior rules.

(a) *Unit operation*. Where a Seller participates in a Commission-approved organized market, Seller must operate and schedule generating facilities, undertake maintenance, declare outages, and commit or otherwise bid supply in a manner that complies with the Commission-approved rules and regulations of the applicable market. A Seller is not required to bid or supply electric energy or other electricity products unless such requirement is a part of a separate Commission-approved tariff or is a requirement applicable to Seller through Seller's participation in a Commission-approved organized market.

(b) *Communications*. A Seller must provide accurate and factual information and not submit false or misleading

(d) A Seller must report on a monthly basis changes to its previously-submitted relational database information, excluding updates to the horizontal market power screens. These submissions must be made by the 15th day of the month following the change. The submission must be prepared in conformance with the instructions posted on the Commission's website.

[Order 697–D, 75 FR 14351, Mar. 25, 2010, as amended by Order 816, 80 FR 67108, Oct. 30, 2015; Order 816–A, 81 FR 33383, May 26, 2016; Order 860, 84 FR 36428, July 26, 2019]

Subpart I—Cross-Subsidization Restrictions on Affiliate Transactions

SOURCE: 73 FR 11025, Feb. 29, 2008, unless otherwise noted.

§ 35.43 Generally.

(a) For purposes of this subpart:

(1) *Affiliate* of a specified company means:

(i) For any person other than an exempt wholesale generator:

(A) Any person that directly or indirectly owns, controls, or holds with power to vote, 10 percent or more of the outstanding voting securities of the specified company;

(B) Any company 10 percent or more of whose outstanding voting securities are owned, controlled, or held with power to vote, directly or indirectly, by the specified company;

(C) Any person or class of persons that the Commission determines, after appropriate notice and opportunity for hearing, to stand in such relation to the specified company that there is liable to be an absence of arm's-length bargaining in transactions between them as to make it necessary or appropriate in the public interest or for the protection of investors or consumers that the person be treated as an affiliate; and

(D) Any person that is under common control with the specified company.

(E) For purposes of paragraph (a)(1)(i) of this section, owning, controlling or holding with power to vote, less than 10 percent of the outstanding voting securities of a specified company creates a rebuttable presumption of lack of control.

(ii) For any exempt wholesale generator (as defined under §366.1 of this chapter), consistent with section 214 of the Federal Power Act (16 U.S.C. 824m), which provides that ''affiliate'' will have the same meaning as provided in section 2(a) of the Public Utility Holding Company Act of 1935 (15 U.S.C. 79b(a)(11)):

(A) Any person that directly or indirectly owns, controls, or holds with power to vote, 5 percent or more of the outstanding voting securities of the specified company;

(B) Any company 5 percent or more of whose outstanding voting securities are owned, controlled, or held with power to vote, directly or indirectly, by the specified company;

(C) Any individual who is an officer or director of the specified company, or of any company which is an affiliate thereof under paragraph (a)(1)(ii)(A) of this section; and

(D) Any person or class of persons that the Commission determines, after appropriate notice and opportunity for hearing, to stand in such relation to the specified company that there is liable to be an absence of arm's-length bargaining in transactions between them as to make it necessary or appropriate in the public interest or for the protection of investors or consumers that the person be treated as an affiliate.

(2) *Captive customers* means any wholesale or retail electric energy customers served by a franchised public utility under cost-based regulation.

(3) *Franchised public utility* means a public utility with a franchised service obligation under state law.

(4) *Market-regulated power sales affiliate* means any power seller affiliate other than a franchised public utility, including a power marketer, exempt wholesale generator, qualifying facility or other power seller affiliate, whose power sales are regulated in whole or in part on a market-rate basis.

(5) *Non-utility affiliate* means any affiliate that is not in the power sales or transmission business, other than a local gas distribution company or an interstate natural gas pipeline.

(b) The provisions of this subpart apply to all franchised public utilities that have captive customers or that own or provide transmission service over jurisdictional transmission facilities.

§ 35.44 Protections against affiliate cross-subsidization.

(a) *Restriction on affiliate sales of electric energy.* No wholesale sale of electric energy may be made between a franchised public utility with captive customers and a market-regulated power sales affiliate without first receiving Commission authorization for the transaction under section 205 of the Federal Power Act. This requirement does not apply to energy sales from a qualifying facility, as defined by 18 CFR 292.101, made under market-based rate authority granted by the Commission.

(b) *Non-power goods or services.* (1) Unless otherwise permitted by Commission rule or order, and except as permitted by paragraph (b)(4) of this section, sales of any non-power goods or services by a franchised public utility that has captive customers or that owns or provides transmission service over jurisdictional transmission facilities, including sales made to or through its affiliated exempt wholesale generators or qualifying facilities, to a market-regulated power sales affiliate or non-utility affiliate must be at the higher of cost or market price.

(2) Unless otherwise permitted by Commission rule or order, and except as permitted by paragraphs (b)(3) and (b)(4) of this section, a franchised public utility that has captive customers or that owns or provides transmission service over jurisdictional transmission facilities, may not purchase or receive non-power goods and services from a market-regulated power sales affiliate or a non-utility affiliate at a price above market.

(3) A franchised public utility that has captive customers or that owns or provides transmission service over jurisdictional transmission facilities, may only purchase or receive non-power goods and services from a centralized service company at cost.

(4) A company in a single-state holding company system, as defined in § 366.3(c)(1) of this chapter, may provide general administrative and management non-power goods and services to, or receive such goods and services from, other companies in the same holding company system, at cost, provided that the only parties to transactions involving these non-power goods and services are affiliates or associate companies, as defined in § 366.1 of this chapter, of a holding company in the holding company system.

(c) *Exemption for price under fuel adjustment clause regulations.* Where the price of fuel from a company-owned or controlled source is found or presumed under § 35.14 to be reasonable and includable in the adjustment clause, transactions involving that fuel shall be exempt from the affiliate price restrictions in § 35.44(b).

[73 FR 11025, Feb. 29, 2008, as amended by Order 707–A, 73 FR 43083, July 24, 2008]

Subpart J—Credit Practices In Organized Wholesale Electric Markets

SOURCE: Order 741, 75 FR 65962, Oct. 27, 2010, unless otherwise noted.

§ 35.45 Applicability.

This subpart establishes credit practices for organized wholesale electric markets for the purpose of minimizing risk to market participants.

§ 35.46 Definitions.

As used in this subpart:

(a) *Market Participant* means an entity that qualifies as a Market Participant under § 35.34.

(b) *Organized Wholesale Electric Market* includes an independent system operator and a regional transmission organization.

(c) *Regional Transmission Organization* means an entity that qualifies as a Regional Transmission Organization under 18 CFR 35.34.

(d) *Independent System Operator* means an entity operating a transmission system and found by the Commission to be an Independent System Operator.

INTERROGATORY NO. 58

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S SECOND SET OF INTERROGATORIES
INTERROGATORY NO. 58
BATES PAGE(S): 18134 - 18140
APRIL 22, 2024

58. Cost Allocation Manual ("CAM"). Please address the following regarding CAMs and all related affiliate service agreements that address the allocation/assignment of expenses and capital costs among and between Emera, service companies, TECO, and all other foreign and U.S. affiliates (including regulated and unregulated utilities and operations) for the most recent six-year period from 2019 to 2024. This is intended to refer to all documents addressing expenses and capital costs allocated/assigned from Emera, service companies, and all affiliates (including cost allocations as applicable to various equity investments) to TECO and the same type of costs allocated from TECO to all affiliates. This request is intended to address all U.S. and foreign gas, electric, alternative energy, transmission and other affiliates to which Emera and its service companies allocate/assign expenses and capital costs, including (but not limited to) TECO, Novia Scotia Power, Inc. ("NSPI"), Peoples Gas System ("PGS"), New Mexico Gas Company ("NMGC"), SeaCoast Gas Transmission, LLC ("Seacoast"), Emera Brunswick Pipeline Company Limited ("Brunswick"), Barbados Light & Power Company Limited ("BLPC"), Grand Bahama Power Company Limited ("GBPC") and other affiliates. To the extent applicable, this should also apply to Emera's expenses and capital costs allocated/assigned to Equity Investments including (but not limited to) NSP Maritime Link Inc. ("NSPML"), Labrador Island Link Limited Partnership ("LIL"), Maritimes & Northeast Pipeline Limited Partnership and Maritimes & Northeast Pipeline, LLC ("M&NP"), St. Lucia Electric Services ("Lucelec"), Dominica Electricity Services Ltd. ("Domlec") and all other equity investments for the periods from 2019 to 2024. Please provide the following detailed information:

a. Explain why CAMs and related affiliate service agreements do not exist for (or do not apply) to those U.S. and foreign affiliates and Equity Investments cited in the preamble above (along with any other affiliates) for the periods from 2019 to 2024.

b. Explain all changes (and the reasons for changes) in the CAMs and affiliate service agreements from 2019 to 2024, including changes in:

   i. allocation methods/factors;

   ii. the number and types of affiliates subject to the CAM and cost allocation;

   iii. changes related to reorganization of Emera and affiliates, including the spin-off of the Peoples Gas System, Inc. ("PGS") gas division

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S SECOND SET OF INTERROGATORIES
INTERROGATORY NO. 58
BATES PAGE(S): 18134 - 18140
APRIL 22, 2024

addressed in the Commission's December 27, 2023, Order in Docket No. 20230023-GU (and related dockets);

iv. All other changes in how costs are allocated/assigned from Emera and service companies to all affiliates.

c. Regarding (b) above, specifically explain and provide the actual impact (or estimated impact) of each change on the costs allocated/assigned to: i) TECO, and ii) all other affiliates combined) for each of the calendar years 2019 to 2024 (if the change is not related to or measured on a "calendar year" basis, the actual or estimated change can be provided on a calendar year or other periodic basis). Please provide all supporting documentation and related calculations.

Answer:

In addition to its general objections, which are incorporated herein by reference, Tampa Electric objects to this interrogatory on grounds that it is overbroad; burdensome; presumes facts about the way affiliate costs are charged and allocated to and from Tampa Electric that are inconsistent with the approach used by Emera, its subsidiaries, and Tampa Electric; and seeks information that is beyond the scope of discovery in this case. Notwithstanding these objections, Tampa Electric has consulted with OPC and its consultant, has provided preliminary information responsive to this interrogatory before the prescribed answer date, and is continuing to work cooperatively and in good faith with OPC and its consultant to provide a reasonable and responsive answer. Please see Tampa Electric's response to OPC's Second Request for Production of Documents, No. 34.

POD NO. 34

33. Please provide all spreadsheets that support or feed into other spreadsheets with all formulas intact (no "values") for Interrogatory No. 52.

Response:

Tampa Electric's non-confidential electronic documents responsive to this request will be served by posting on the SharePoint in the folder entitled "POD_2_33."

34. Please address the following regarding CAMs and all related affiliate service agreements that address the allocation/assignment of expenses and capital costs among and between Emera, service companies, TECO, and all other foreign and U.S. affiliates (including regulated and unregulated utilities and operations) for the most recent six-year period from 2019 to 2024. This is intended to refer to all documents addressing expenses and capital costs allocated/assigned from Emera, service companies, and all affiliates (including cost allocations as applicable to various equity investments) to TECO and the same type of costs allocated from TECO to all affiliates. This request is intended to address all U.S. and foreign gas, electric, alternative energy, transmission and other affiliates to which Emera and its service companies allocate/assign expenses and capital costs, including (but not limited to) TECO, Novia Scotia Power, Inc. ("NSPI"), Peoples Gas System ("PGS"), New Mexico Gas Company ("NMGC"), SeaCoast Gas Transmission, LLC ("Seacoast"), Emera Brunswick Pipeline Company Limited ("Brunswick"), Barbados Light & Power Company Limited ("BLPC"), Grand Bahama Power Company Limited ("GBPC") and other affiliates. To the extent applicable, this should also apply to Emera's expenses and capital costs allocated/assigned to Equity Investments including (but not limited to) NSP Maritime Link Inc. ("NSPML"), Labrador Island Link Limited Partnership ("LIL"), Maritimes & Northeast Pipeline Limited Partnership and Maritimes & Northeast Pipeline, LLC ("M&NP"), St. Lucia Electric Services ("Lucelec"), Dominica Electricity Services Ltd. ("Domlec") and all other equity investments for the periods from 2019 to 2024. Please provide the following detailed information:

a. Provide a copy of the CAMs and related affiliate service agreements in place for the six-year period from 2019 to 2024 for Emera, TECO, and all affiliates cited in the preamble above, and identify the specific time period that each CAM and affiliate service agreement was in place (providing beginning and expiration dates).

b. Please provide all supporting documentation related to Interrogatory No. 58.

Response:

Tampa Electric's non-confidential electronic documents responsive to this request will be served by posting on the SharePoint in the folder entitled "POD_2_34."

35. Please address the following regarding auditor/CPA Reports (Limited Engagement Report, Agreed Upon Procedures Report, or other similar reports) that address the amounts and/or allocation processes of the CAM:

INTERROGATORY NO. 62

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 62
BATES PAGE(S): 18147 - 18148
APRIL 22, 2024**

62. Allocation Factor by Type of Allocation Method for Each Affiliate. For each of the calendar years 2019 to 2023 regarding the allocation factor for each allocation method for each affiliate:

a. For each of the calendar years 2019 to 2023 (and for estimated/projected periods used in the test period), provide the allocation factor percentage (numerator divided by denominator) for each specific type of allocation method for TECO and each Emera affiliate. For example, if the amount of payroll costs are used as a "payroll" allocation method to allocate certain affiliate costs, then provide the "payroll" percentage allocation factor for each affiliate for each of the years 2019 to 2024.

b. Regarding (a) above, if possible, provide the amount of affiliate costs allocated by each allocation factor method to each affiliate for calendar years 2019 to 2023. At minimum, provide the specific allocated amounts for TECO and total combined amounts for all other affiliates.

c. For each of the calendar years 2019 to 2023 (and for estimated/projected periods used in the test period), provide the allocation factor percentage (numerator divided by denominator) for each type of cost pool (and identify the types of costs included in each cost pool) for TECO and each Emera affiliate. For example, if the cost pool consists of legal expenses and corporate expenses that are allocated using a specific allocation method, then provide this percentage allocation factor for each affiliate for each of the years 2019 to 2024.

d. Regarding (c) above, if possible, provide the amount of affiliate costs allocated by each cost pool allocation factor method to each affiliate for calendar years 2019 to 2023. At minimum, provide the specific allocated amounts for TECO and total combined amounts for all other affiliates.

e. Regarding (a) and (c) above, explain the reason for annual changes in the allocation factor of each affiliate, when the gross factor changes by 3% or more for each calendar year (i.e., if the allocation factor percent was 5% in 2021 and changed to 8% or more in the subsequent year 2022).

Answer:

In addition to its general objections, which are incorporated herein by reference, Tampa Electric objects to this interrogatory on grounds that it is overbroad;

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S SECOND SET OF INTERROGATORIES
INTERROGATORY NO. 62
BATES PAGE(S): 18147 - 18148
APRIL 22, 2024

burdensome; presumes facts about the way affiliate costs are charged and allocated to and from Tampa Electric that are inconsistent with the approach used by Emera, its subsidiaries, and Tampa Electric; and seeks information that is beyond the scope of discovery in this case. Notwithstanding these objections, Tampa Electric has consulted with OPC and its consultant, has provided preliminary information responsive to this interrogatory before the prescribed answer date, and is continuing to work cooperatively and in good faith with OPC and its consultant to provide a reasonable and responsive answer. Please see the company's response to OPC's Second Request for Production, No. 34.

POD NO. 38

responsive to this request on the SharePoint in the folder entitled "CONF_POD_2_37," and is continuing to work cooperatively and in good faith with OPC and its consultant to provide a reasonable and responsive answer.

38. For each of the calendar years 2019 to 2023 regarding the allocation factor for each allocation method for each affiliate, please provide copies of any documentation that support (including the reasons for the changes) in your response to Interrogatory No. 62.

Response:

In addition to its general objections, which are incorporated herein by reference, Tampa Electric objects to this request on grounds that it relates to an interrogatory that is overbroad; burdensome; presumes facts about the way affiliate costs are charged and allocated to and from Tampa Electric that are inconsistent with the approach used by Emera, its subsidiaries, and Tampa Electric; and seeks information that is beyond the scope of discovery in this case. Notwithstanding these objections, Tampa Electric has consulted with OPC and its consultant, has provided preliminary information responsive to Interrogatory No. 62 before the prescribed answer date, has posted documents responsive to this request on the SharePoint in the folder entitled "POD_2_34," and is continuing to work cooperatively and in good faith with OPC and its consultant to provide a reasonable and responsive answer.

39. Addressing the actual, estimated/projected, and rate case adjusted affiliate costs allocated to TECO in the current rate case, please provide all supporting documentation related to Interrogatory No. 63.

Response:

In addition to its general objections, which are incorporated herein by reference, Tampa Electric objects to this request on grounds that it relates to an interrogatory that is overbroad; burdensome; presumes facts about the way affiliate costs are charged and allocated to and from Tampa Electric that are inconsistent with the approach used by Emera, its subsidiaries, and Tampa Electric; and seeks information that is beyond the scope of discovery in this case. Notwithstanding these objections, Tampa Electric has consulted with OPC and its consultant, has provided preliminary information responsive to Interrogatory No. 63 before the prescribed answer date, has posted documents responsive to this request on the SharePoint in the folder entitled " POD_2_39" and is continuing to work cooperatively and in good faith with OPC and its consultant to provide a reasonable and responsive answer.

40. The spin-off of the PGS gas division was addressed in the Commission's December 27, 2023, Order in Docket No. 20230023-GU (and related dockets), indicating that PGS was created as a separate legal entity from TECO effective January 1, 2023, and TECO is no longer a direct parent company of PGS.

INTERROGATORY NO. 63

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S SECOND SET OF INTERROGATORIES
INTERROGATORY NO. 63
BATES PAGE(S): 18149 - 18150
APRIL 22, 2024

63. Affiliate Costs in the Current Rate Case. Address the following regarding actual, estimated/projected, and rate case adjusted affiliate costs allocated to TECO in the current rate case:

a. Provide the separate amount of affiliate expenses and capital costs allocated/assigned to TECO by Emera (and all affiliates) that is reflected in the test period of the current rate case, and show all related actual amounts for the test period (before revisions to estimated/projected amounts and before any rate case adjustments), all estimated/projected amounts, and all "rate case adjusted" amounts (and calculations for estimated/projected amounts and "rate case adjusted" amounts).

b. Regarding (a) above, show all affiliate expenses and capital costs for actual, estimated/projected, and rate case adjusted by rate case account number (and account description) and FERC account number (and account description) if the FERC account number is different than rate case account numbers used in the rate case.

c. For each rate case adjustment proposed by the Company (cite to the specific rate case adjustment number and amount), show the amount of the actual cost and related rate case adjustment that is: i) directly incurred; and ii) related to affiliate allocated expenses and capital costs, and show amounts by rate case account number and FERC account number.

d. Provide the total amount of unadjusted (per book) expenses and capital costs allocated to TECO by Emera/affiliates by rate case account number and FERC account number, the amount of each rate case adjustment for each affiliate expense and capital cost by rate case account number and FERC account number, and the final adjusted affiliate expense and capital cost by rate case account number and FERC account number.

Answer:

In addition to its general objections, which are incorporated herein by reference, Tampa Electric objects to this interrogatory on grounds that it is overbroad; burdensome; presumes facts about the way affiliate costs are charged and allocated to and from Tampa Electric that are inconsistent with the approach used by Emera, its subsidiaries, and Tampa Electric; and seeks information that is beyond the scope of discovery in this case. Notwithstanding these objections,

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 63
BATES PAGE(S): 18149 - 18150
APRIL 22, 2024

Tampa Electric is has consulted with OPC and its consultant, has provided preliminary information responsive to this interrogatory before the prescribed answer date, and is continuing to work cooperatively and in good faith with OPC and its consultant to provide a reasonable and responsive answer. Please see Tampa Electric's response to OPC's Second Request for Production of Documents, No 39.

POD NO. 39

responsive to this request on the SharePoint in the folder entitled "CONF_POD_2_37," and is continuing to work cooperatively and in good faith with OPC and its consultant to provide a reasonable and responsive answer.

38. For each of the calendar years 2019 to 2023 regarding the allocation factor for each allocation method for each affiliate, please provide copies of any documentation that support (including the reasons for the changes) in your response to Interrogatory No. 62.

Response:

In addition to its general objections, which are incorporated herein by reference, Tampa Electric objects to this request on grounds that it relates to an interrogatory that is overbroad; burdensome; presumes facts about the way affiliate costs are charged and allocated to and from Tampa Electric that are inconsistent with the approach used by Emera, its subsidiaries, and Tampa Electric; and seeks information that is beyond the scope of discovery in this case. Notwithstanding these objections, Tampa Electric has consulted with OPC and its consultant, has provided preliminary information responsive to Interrogatory No. 62 before the prescribed answer date, has posted documents responsive to this request on the SharePoint in the folder entitled "POD_2_34," and is continuing to work cooperatively and in good faith with OPC and its consultant to provide a reasonable and responsive answer.

39. Addressing the actual, estimated/projected, and rate case adjusted affiliate costs allocated to TECO in the current rate case, please provide all supporting documentation related to Interrogatory No. 63.

Response:

In addition to its general objections, which are incorporated herein by reference, Tampa Electric objects to this request on grounds that it relates to an interrogatory that is overbroad; burdensome; presumes facts about the way affiliate costs are charged and allocated to and from Tampa Electric that are inconsistent with the approach used by Emera, its subsidiaries, and Tampa Electric; and seeks information that is beyond the scope of discovery in this case. Notwithstanding these objections, Tampa Electric has consulted with OPC and its consultant, has provided preliminary information responsive to Interrogatory No. 63 before the prescribed answer date, has posted documents responsive to this request on the SharePoint in the folder entitled " POD_2_39" and is continuing to work cooperatively and in good faith with OPC and its consultant to provide a reasonable and responsive answer.

40. The spin-off of the PGS gas division was addressed in the Commission's December 27, 2023, Order in Docket No. 20230023-GU (and related dockets), indicating that PGS was created as a separate legal entity from TECO effective January 1, 2023, and TECO is no longer a direct parent company of PGS.

INTERROGATORY NO. 68

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S SECOND SET OF INTERROGATORIES
INTERROGATORY NO. 68
BATES PAGE(S): 18159 - 18160
APRIL 22, 2024

68. **Affiliate Headcount.** Address the following regarding full-time equivalent (FTE) headcount for Emera affiliate costs allocated to TECO:

a. Provide the FTE headcount for Emera and each affiliate whose costs are subject to allocation to TECO, and provide this information on an annual basis from 2019 to 2022 and on a monthly basis from 2023 to 2024 year-to-date. Provide this information by: i) functional area/group (Corporate, Human Resources, Tax, Legal, etc.), ii) management and union/nonmanagement if possible.

b. Regarding (a) above, provide this information from 2019 to 2024 for PGS.

c. Regarding (a) above, provide this information from 2019 to 2024 for all Call Center employees (service representatives and management) whose costs are subject to allocation to TECO.

d. Regarding (a) above, provide this information from 2019 to 2024 for all Training Center employees whose costs are subject to allocation to TECO.

e. Regarding (a) to (d) above, explain if the total number of FTE employees can be translated to an "allocated" number of FTE employees to TECO via affiliate allocations, and provide all supporting calculations.

f. Regarding (a) to (d) above, explain the reasons for annual changes in FTE's that equal or exceed 5%, and explain if the changes are due to reorganization, voluntary retirement programs, involuntary retirement programs, etc.

g. Regarding (a) to (d) above, provide a list of the job titles and related affiliate company for all officer/executive level positions included in the FTE's.

h. Regarding (g) above, provide the total payroll expense (before allocation to any affiliate) and the payroll expense after allocation to TECO (show the percent allocated to TECO for each officer/executive), for all officer/executives by job title and related affiliate company for each of the years 2019 to 2023.

Answer:

In addition to its general objections, which are incorporated herein by reference, Tampa Electric objects to this interrogatory on grounds that it is overbroad; burdensome; presumes facts about the way affiliate costs are charged and

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 68
BATES PAGE(S): 18159 - 18160
APRIL 22, 2024

allocated to and from Tampa Electric that are inconsistent with the approach used by Emera, its subsidiaries, and Tampa Electric; and seeks information that is beyond the scope of discovery in this case. Notwithstanding these objections, Tampa Electric is working cooperatively and in good faith with OPC and its consultant to provide a reasonable and responsive answer

INTERROGATORY NO. 95

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S FIFTH SET OF
INTERROGATORIES
INTERROGATORY NO. 95
BATES(S) 26076 - 26093
MAY 13, 2024

95. Allocations from TECO to Affiliates. The OPC's Second Set of Interrogatories (Interrogatory No. 61) and Second Request for Production of Documents (POD No. 37) primarily focuses on the allocation/assignment of costs from Emera and all other affiliates to TECO for calendar years 2019 to 2023. However, this Interrogatory (and related POD No. 71) seeks similar information, except requests information regarding the allocation/assignment of costs from TECO to Emera and all other affiliates. This should include, but is not limited to, TECO allocations/charges to TECO Energy, TECO Services, TECO Finance, TECO Properties Corp., SeaCoast Gas Transmission, PGS, TECO Partners, Inc., New Mexico Natural Gas Company, Emera Inc., Grand Bahamas Power Company, Novia Scotia Power, Emera Energy Svcs, Block Energy, Emera Energy US Sub #1, Scotia Power, and Emera Caribbean (as these affiliates were identified in the April 10, 2024 email from TECO to OPC). Please address the following regarding the allocation/assignment of TECO expenses and capitalized costs to all affiliates for the calendar years 2019 to 2023 (and estimated/budgeted periods 2024, 2025, and adjusted periods for this rate case proceeding) using a top down approach beginning with TECO:

a. First, using a working Excel spreadsheet if possible, please provide a side-by-side comparison for each of the calendar years 2019 to 2023 (and estimated/budgeted periods 2024, 2025, and adjusted periods for this rate case proceeding) of the amount of TECO expenses and capital costs (provide these amounts separately) that are allocated/assigned to all affiliates. Please show these separate allocated/assigned expense and capital costs by:

   i. functional area/group (Corporate, Human Resources, Tax, Legal, etc.), and also by:

   ii. type of expense (payroll, insurance, rent, outside services, etc.) and capital cost (each type of capital asset) included in each of the functional areas/groups in (i) above.

   iii. Please reconcile all amounts in (i) and (ii) to the related FERC Form 1 affiliate transactions information for the applicable years and explain all exceptions.

b. Regarding (a) above, explain each type of allocation method, and provide the specific allocation factor percent (numerator divided by denominator), used to allocate each type of pooled cost (or cost by functional area/group) from TECO to each of the affiliates. Provide all underlying calculations and supporting documentation as requested in POD No. 71 for the numerator

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S FIFTH SET OF
INTERROGATORIES
INTERROGATORY NO. 95
BATES(S) 26076 - 26093
MAY 13, 2024

and denominator of each allocation factor for each of the periods 2019 to 2023 (and estimated/budgeted periods 2024, 2025, and adjusted periods for this rate case proceeding).

c. Regarding (c) above, if applicable, explain why different allocation methods are used to allocate affiliate costs from TECO to affiliates, compared to the allocation methods used to allocate affiliate costs from Emera to TECO and each affiliate.

d. Regarding (b) and (c) above, if applicable, explain if and why the Company uses different allocation methods for allocating costs from TECO to regulated utilities versus unregulated entities, and provide all supporting documentation for this rationale as requested in POD No. 71.

e. Explain why each of the allocation methods identified in (b) above are reasonable to use for each of the types of pooled costs (or the functional area/group costs that are subject to allocation). Explain the correlation between the numerator/denominator inputs of the allocation factors and how these act to drive each of these specific costs.

f. For each of the periods 2019 to 2023 (and estimated/budgeted periods 2024, 2025 and adjusted periods for this rate case proceeding), explain when new or revised allocation methods or allocation factors were introduced (for allocating costs from TECO to affiliates) and explain why it was reasonable to make these changes to allocation methods/factors.

g. Explain and cite to other companies that use similar or the same cost allocation methods used by TECO in allocating/assigning costs to affiliates.

Answer:

a. Please see Tampa Electric's response to OPC's 5th Request for Production of documents, No. 71.

   i. Please see response to subpart (a) above, specifically file titled OPC IRR 95a – Allocations Side by Side.xlsx.

   ii. Please see response to subpart (a) above, specifically file titled OPC IRR 95a – Allocations Side by Side.xlsx. Tampa Electric does not allocate capital costs through assessments.

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S FIFTH SET OF INTERROGATORIES
INTERROGATORY NO. 95
BATES(S) 26076 - 26093
MAY 13, 2024

iii. Please refer to tab IRR 95 & POD 71.xlsx file.

b. Please see Tampa Electric's response to OPC's 5th Request for Production of documents, No. 71

c. Tampa Electric operates and allocates affiliate costs based on the factors described in the file titled "TECO Energy Cost Allocation Manual, " which was included in the company's response to OPC's Second Request for Production, No. 34. The services performed and costs allocated by Tampa Electric are different than those services and costs allocated from Emera to affiliates.

d. Tampa Electric acknowledges the FAC rule for affiliate transactions states that non-regulated affiliates should be charged at the higher of fully allocated cost or market price, however, the company does not change its allocation methods when allocating costs to both regulated entities and non-regulated entities. An analysis of charges sent to non-regulated affiliates would prove the mark-up to market value is immaterial and would not represent an efficient usage of the company's time.

e.

Assessment Type	Assessment Factor	Cost Distribution Reasonableness
HR Benefits Admin **HR Employee Relations** **Administrative Services Emergency Management** **Corporate Communications** **Information Technology** **Payroll** **Document Services**	Headcount	The standard methodology utilized at Tampa Electric Company and its affiliates for this purpose is allocation of costs proportionately based on the number of employees in each company as a percent of total employees for all companies that could receive this service.
Procurement	PO Spend	Procurement Services uses a methodology allocating costs proportionately based on the percentage of total procurement purchase order spend for each company as a percent of total procurement purchase

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S FIFTH SET OF
INTERROGATORIES
INTERROGATORY NO. 95
BATES(S) 26076 - 26093
MAY 13, 2024**

		order spend for all companies that could receive this service.
Accounts Payable	Invoices Processed	Accounts Payable Services uses a methodology allocating costs proportionately based on the number of accounts payable transactions processed for each company as a percent of total accounts payable transactions processed for all companies that could receive this service.
Claims	Claims	Claim Management Services uses a methodology allocating costs proportionately based on the number of open claims processed in each company that could receive this service as a percent to total open claims processed by the department.
Corporate Allocation	MMM	This approach allocates overhead costs based on a blended rate of each operating affiliate's share of three financial components (Assets, Revenues, and Net Income).

f. For the period 2019 through 2023, the following allocation factors were revised/introduced:

- Starting in 2022, Corporate Communications began using direct charging and stopped being included in assessments driven by Peoples Gas hiring team members to support their External Customer communication management and internal employee communications. The department is now called Communications and Marketing and is under the Customer Experience Structure.
- Payroll assessment was embedded within HR assessment from 2019-2023. Beginning in 2024, Payroll became its own assessment driven by organizational shifts of responsibilities. The allocation method remains the same.

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S FIFTH SET OF
INTERROGATORIES
INTERROGATORY NO. 95
BATES(S) 26076 - 26093
MAY 13, 2024

- Document Services assessment was embedded within Admin Services assessment from 2019-2023. Beginning in 2024, Document Services became its own assessment driven by organizational shifts of responsibilities. The allocation method remains the same.

g. Tampa Electric objects to this interrogatory on the grounds that the company does not possess the requested information and searching for the requested information would be unduly burdensome.

POD NO. 71

2024 TOTAL

TECO TAMPA ELECTRIC AN EMERA COMPANY

Organization	Department	Assessment Factor	Cost Center	Direct + Allocable Total Cost	Direct Total Cost	Allocable Total Cost
Legal Services	VP General Counsel	MMM	A230060	$ 526,952	$ -	$ 526,952
Legal Services	Corporate Secretary	MMM	A230062	$ 476,172	$ 244,256	$ 231,916
Legal Services	Legal Services	MMM	A230092	$ 1,923,171	$ 1,348,300	$ 574,871
Legal Services	Claims	Claims	A230048	$ 798,636	$ -	$ 798,636
Legal Services	Compliance	MMM	A230050	$ 476,267	$ 1,816	$ 474,451
State/Comm Affairs	Federal Affairs	MMM	A230054	$ 441,072	$ 398,056	$ 43,016
Legal Services	Real Estate	N/A		$ 1,423,435	$ 1,423,435	$ -
Finance	Accounts Payable	Invoices	A263001	$ 1,091,352	$ -	$ 1,091,352
Finance	Energy Risk	MMM	A230073	$ 276,986	$ 239,620	$ 37,366
Finance	Insurance Risk	MMM	A230085	$ 484,005	$ 221,240	$ 262,765
Finance	Treasury	MMM	A230087	$ 911,216	$ 4,916	$ 906,300
Finance	Corporate Tax	MMM	A230090	$ 1,584,781	$ 1,101,184	$ 483,597
Finance	Corporate Accounting	MMM	A230088	$ 2,285,298	$ 11,201	$ 2,274,097
Finance	Audit Services	MMM	A230089	$ 1,522,146	$ 38,402	$ 1,483,744
Finance	Pension Investments	MMM		$ -	$ -	$ -
Finance	Planning & Budgets	MMM	A234019	$ 447,575	$ 49,001	$ 398,574
Procurement	Document Services	Headcount	A232039	$ 765,140	$ 8,870	$ 756,270
Human Resources	Payroll	Headcount	A233551	$ 509,150	$ -	$ 509,150
Corporate	Corporate Responsibility	MMM		$ 16,651,243	$ -	$ 16,651,243
Corporate	Other Corporate	MMM		$ 11,252	$ -	$ 11,252
Corporate	Corporate Communications	Headcount	A251302	$ 2,360,305	$ -	$ 2,360,305
Safety & Security	Corporate Security	N/A	A231003	$ -	$ -	$ -
Safety & Security	Emergency Management	Headcount	A231004	$ 754,749	$ 220,773	$ 533,976
Human Resources	Healthcare	Headcount	A233552	$ 558,256	$ -	$ 558,256
Human Resources	Retirement	Headcount	553	$ 483,677	$ 207	$ 483,470
Human Resources	Benefits Admin	Headcount	A233554	$ 790,589	$ -	$ 790,589
Human Resources	Compensation	Headcount	A233556	$ 661,472	$ -	$ 661,472
Human Resources	HR Managers	Headcount	A233550	$ 978,254	$ 693,390	$ 284,864
Human Resources	Assessment & Development	Headcount	557	$ 234,984	$ -	$ 234,984
Human Resources	Training & Development	Headcount	A233555	$ 741,104	$ (7)	$ 741,111
Human Resources	Recruitment & Staffing	Headcount	A233558	$ 750,350	$ 1,526	$ 748,824
Human Resources	Employee Relations Admin	Headcount	559	$ 451,179	$ 34,621	$ 416,558
Human Resources	HRIS	Headcount		$ -	$ -	$ -
Human Resources	Labor Relations	Headcount	A233560	$ 790,913	$ 12,086	$ 778,827
Procurement	Procurement Admin	PO Spend	A232030	$ 520,779	$ -	$ 520,779
Procurement	Purchase & Inventory Management	PO Spend	A232029	$ 1,077,744	$ -	$ 1,077,744
Procurement	Supplier Diversity	PO Spend	A232028	$ 862,089	$ -	$ 862,089
Procurement	Contracts Admin	PO Spend	A232034	$ 1,632,822	$ -	$ 1,632,822
Procurement	Record Retention	Headcount	A232032	$ 41,645	$ -	$ 41,645
Procurement	Duplicating	Headcount	A232036	$ 162,702	$ -	$ 162,702
Procurement	Mailroom	Headcount	A232038	$ 617,820	$ -	$ 617,820
Information Technology	IT Allocable Costs (Telecom/Facilities Overhead)- Vacancy	Headcount	A231500	$ -	$ -	$ -
Information Technology	IT Allocable Costs (Telecom/Facilities Overhead)	Headcount	A231500	$ 3,271,425	$ -	$ 3,271,425
Information Technology	IT Admin	Headcount	A231505	$ 2,601,039	$ 546,251	$ 2,054,788
Information Technology	ED/ES Leadership	Headcount	A231538	$ -	$ -	$ -
Information Technology	ED/ES Delivery Control Systems	Headcount	A231539	$ -	$ -	$ -
Information Technology	ED/ES Work & Asset Management Systems	Headcount		$ -	$ -	$ -
Information Technology	Project Mgmt - ED & ES	Headcount	A231557		$ -	
Information Technology	BRM & BSA - ED & ES	Headcount	A231556		$ -	
Information Technology	Data Mgt, Analytics & Reporting	Headcount	A231540	$ 1,273,940	$ 22,236	$ 1,251,704
Information Technology	Innovation, Automation & Emerging Tech	Headcount	A231503	$ -	$ -	$ -
Information Technology	Project Mgmt - ADS	Headcount		$ -	$ -	$ -
Information Technology	Project Mgmt & BP Support	Headcount	A231517	$ 352,729	$ 7,208	$ 345,522
Information Technology	Data Center / Compute & Storage	Headcount	A231506	$ 565,931	$ 852	$ 565,079
Information Technology	Data Management	Headcount	A231511	$ 1,781,770	$ 72,753	$ 1,709,016
Information Technology	Network Engineering/Infrastructure	Headcount	A231527	$ 382,207	$ 1,567	$ 380,640
Information Technology	Cyber Security Operations	Headcount	A231529	$ 1,501,637	$ -	$ 1,501,637
Information Technology	Service Desk	Headcount		$ 1,205,251	$ -	$ 1,205,251
Information Technology	Desktop & Field Support	Headcount		$ 995,190	$ 133,806	$ 861,293
Information Technology	Data Center / Network & Enterprise Hardening	Headcount	A231521	$ 1,426,394	$ -	$ 1,426,394
Information Technology	Compliance Ops	Headcount		$ -	$ -	$ -
Information Technology	Hosting & Cloud	Headcount	A232542	$ -	$ -	$ -
Information Technology	Digital Collaboration	Headcount	A231514	$ -	$ -	$ -
Information Technology	Service Mgmt	Headcount		$ -	$ -	$ -
Information Technology	Remote Access & Desktop Engineering	Headcount		$ -	$ -	$ -
Information Technology	Cyber Security Architecture	Headcount		$ -	$ -	$ -
Information Technology	Business Relationship Managers	Headcount	A231504	$ 680,930	$ 669,675	$ 11,256
Information Technology	Enterprise Architecture & IT DR/BC	Headcount	A231509	$ (18,426)	$ -	$ (18,426)
Information Technology	Enterprise Information Security & Risk Mgmt	Headcount	A231513	$ 822,060	$ 2,541	$ 819,519
Information Technology	Project Mgt Office - Project & Program Mgt	Headcount	A231512	$ 2,175,765	$ 113,439	$ 2,058,326
Information Technology	Project Mgt Office - BSA	Headcount	A231530	$ -	$ -	$ -
Information Technology	Project Mgt Office - TaaS	Headcount		$ -	$ -	$ -
Information Technology	IT Maintenance	Headcount	A231522	$ 8,580,253	$ 2,882,327	$ 5,697,906
Information Technology	Asset & Vendor Managment	Headcount	A231525	$ 720,226	$ 22,354	$ 697,873
Information Technology	Quality Assurance & Compliance	Headcount	A231524	$ 422,416	$ 125	$ 422,291
Information Technology	NERC	Headcount	536/F231520/F23152	$ 2,610,841	$ 2,610,841	$ -
Information Technology	Project Mgmt - Compliance	Headcount		$ -	$ -	$ -
Information Technology	BRM & BSA - Compliance	Headcount		$ -	$ -	$ -
Information Technology	Performance Opt, Benchmarking, Communications & Admin	Headcount	A231523	$ 317,333	$ 10,779	$ 306,553
Information Technology	PGS Operations	Headcount	A231510	$ 1,224,466	$ 235,472	$ 988,994
Information Technology	PGS Work & Asset Mgmt	Headcount		$ -	$ -	$ -
Information Technology	BIS - Customer Experience	Headcount		$ 3,421,412	$ 3,421,412	$ -
Information Technology	IT Corporate Operations	Headcount	A231532	$ -	$ -	$ -
Information Technology	Identity Access & HR	Headcount	A231533	$ -	$ -	$ -
Information Technology	Corporate Business Solutions	Headcount	A231528	$ 2,425,143	$ -	$ 2,425,143
Information Technology	Corporate Technology Solutions	Headcount		$ -	$ -	$ -
Information Technology	Project Mgmt - IT & Corp	Headcount		$ -	$ -	$ -
Information Technology	BRM & BSA - IT & Corp	Headcount		$ -	$ -	$ -
Information Technology	Strategic Technology Initiatives & Governance	Headcount		$ -	$ -	$ -

Allocable columns (all cells not listed are $ -):

Department	TEC	PGS	NMGC	TECO Pipeline	Seacoast	TECO Partners	TECO Gemstone	TECO Energy	Emera Technologies	TECO Services
VP General Counsel	393,086	75,934	52,645	4,690	-	-	-	-	-	-
Corporate Secretary	175,264	33,419	23,168	3,064	-	-	-	-	-	-
Legal Services	429,486	82,839	57,430	5,116	-	-	-	-	-	-
Claims	338,222	445,799	12,618	-	-	639	-	1,358	-	-
Compliance	354,462	68,369	47,398	4,223	-	-	-	-	-	-
Federal Affairs	32,137	6,199	4,297	383	-	-	-	-	-	-
Real Estate	-	-	-	-	-	-	-	-	-	-
Accounts Payable	623,162	314,746	113,719	-	13,751	23,028	-	2,947	-	-
Energy Risk	27,916	5,384	3,733	333	-	-	-	-	-	-
Insurance Risk	196,312	37,864	26,250	2,339	-	-	-	-	-	-
Treasury	677,097	130,598	90,539	8,066	-	-	-	-	-	-
Corporate Tax	361,296	69,686	48,311	4,304	-	-	-	-	-	-
Corporate Accounting	1,698,978	327,697	227,182	20,239	-	-	-	-	-	-
Audit Services	1,108,505	213,808	148,226	13,205	-	-	-	-	-	-
Planning & Budgets	297,775	57,435	39,818	3,547	-	-	-	-	-	-
Document Services	581,496	159,724	-	-	-	15,050	-	-	-	-
Payroll	339,145	81,158	75,965	-	-	7,077	5,806	-	-	-
Corporate Responsibility	12,440,144	2,399,444	1,663,459	148,196	-	-	-	-	-	-
Other Corporate	8,391	1,618	1,122	100	-	-	-	-	-	-
Corporate Communications	1,675,108	626,189	-	-	-	59,008	-	-	-	-
Emergency Management	326,579	89,706	109,255	-	-	8,437	-	-	-	-
Healthcare	371,954	68,986	93,392	-	-	7,760	6,364	-	-	-
Retirement	323,030	77,065	72,134	-	-	6,720	5,522	-	-	-
Benefits Admin	526,611	126,020	117,956	-	-	10,989	9,013	-	-	-
Compensation	440,606	105,439	98,692	-	-	9,194	7,541	-	-	-
HR Managers	218,491	56,289	5,270	-	-	4,814	-	-	-	-
Assessment & Development	180,232	46,433	4,347	-	-	3,971	-	-	-	-
Training & Development	568,432	146,444	13,711	-	-	12,525	-	-	-	-
Recruitment & Staffing	574,348	147,968	13,853	-	-	12,655	-	-	-	-
Employee Relations Admin	319,500	82,312	7,706	-	-	7,040	-	-	-	-
Labor Relations	597,360	153,896	14,408	-	-	13,162	-	-	-	-
Procurement Admin	422,612	88,012	7,968	-	-	2,187	-	-	-	-
Purchase & Inventory Management	874,589	182,139	16,489	-	-	4,527	-	-	-	-
Supplier Diversity	699,585	145,693	13,190	-	-	3,621	-	-	-	-
Contracts Admin	1,325,043	275,949	24,982	-	-	6,858	-	-	-	-
Record Retention	33,021	8,795	-	-	-	829	-	-	-	-
Duplicating	125,101	34,363	-	-	-	3,238	-	-	-	-
Mailroom	475,062	130,484	-	-	-	12,295	-	-	-	-
IT Allocable Costs (Telecom/Facilities Overhead)	2,130,352	585,258	501,182	-	-	54,633	-	-	-	-
IT Admin	1,338,078	367,602	314,793	-	-	34,315	-	-	-	-
Data Mgt, Analytics & Reporting	815,110	223,930	191,761	-	-	20,903	-	-	-	-
Project Mgmt & BP Support	225,009	61,814	52,934	-	-	5,770	-	-	-	-
Data Center / Compute & Storage	367,979	101,093	86,570	-	-	9,437	-	-	-	-
Data Management	1,112,913	305,743	261,821	-	-	28,541	-	-	-	-
Network Engineering/Infrastructure	247,879	68,096	58,314	-	-	6,357	-	-	-	-
Cyber Security Operations	756,458	207,817	177,963	-	-	19,399	-	-	-	-
Service Desk	782,255	214,904	184,032	-	-	20,061	-	-	-	-
Desktop & Field Support	560,874	154,085	131,950	-	-	14,384	-	-	-	-
Data Center / Network & Enterprise Hardening	928,770	255,155	218,503	-	-	23,818	-	-	-	-
Business Relationship Managers	7,330	2,014	1,724	-	-	188	-	-	-	-
Enterprise Architecture & IT DR/BC	(11,997)	(3,296)	(2,822)	-	-	(308)	-	-	-	-
Enterprise Information Security & Risk Mgmt	533,671	146,612	125,552	-	-	13,686	-	-	-	-
Project Mgt Office - Project & Program Mgt	1,340,282	368,214	315,320	-	-	34,374	-	-	-	-
IT Maintenance	3,710,477	1,019,351	872,919	-	-	95,155	-	-	-	-
Asset & Vendor Managment	454,455	124,849	106,914	-	-	11,654	-	-	-	-
Quality Assurance & Compliance	274,996	75,548	64,695	-	-	7,052	-	-	-	-
Performance Opt, Benchmarking, Communications & Admin	199,628	54,842	46,964	-	-	5,119	-	-	-	-
PGS Operations	644,033	176,931	151,514	-	-	16,516	-	-	-	-
Corporate Business Solutions	1,579,253	433,856	371,532	-	-	40,500	-	-	-	-

Direct columns (all cells not listed are $ -):

Department	Tampa Electric	PGS	NMGC	TECO Pipeline	Seacoast Gas Transmission	TECO Energy	TECO Partners	Emera, Inc.	Nova Scotia Power	Grand Bahama	Emera Caribbean (incl Barbados)	Emera Energy Services	Emera Technologies	US Sub 1	Teco Finance
Corporate Secretary	151,080	51,964	37,032	-	4,180	-	-	-	-	-	-	-	-	-	-
Legal Services	820,765	460,828	-	-	2,815	17,605	46,287	-	-	-	-	-	-	-	-
Compliance	1,816	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Federal Affairs	-	-	-	-	-	398,056	-	-	-	-	-	-	-	-	-
Real Estate	1,317,472	102,452	-	-	-	3,511	-	-	-	-	-	-	-	-	-
Energy Risk	134,003	82,147	23,470	-	-	-	-	-	-	-	-	-	-	-	-
Insurance Risk	104,888	58,176	58,176	-	-	-	-	-	-	-	-	-	-	-	-
Treasury	4,916	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Corporate Tax	654,182	285,552	147,678	-	3,704	-	6,292	-	-	-	-	-	-	-	3,776
Corporate Accounting	8,528	2,673	-	-	-	-	-	-	-	-	-	-	-	-	-
Audit Services	(1,129)	-	-	-	-	-	-	29,266	-	-	10,265	-	-	-	-
Planning & Budgets	48,356	645	-	-	-	-	-	-	-	-	-	-	-	-	-
Document Services	8,870	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Emergency Management	220,773	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Retirement	207	-	-	-	-	-	-	-	-	-	-	-	-	-	-
HR Managers	693,390	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Training & Development	(7)	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Recruitment & Staffing	799	727	-	-	-	-	-	-	-	-	-	-	-	-	-
Employee Relations Admin	34,153	468	-	-	-	-	-	-	-	-	-	-	-	-	-
Labor Relations	12,086	-	-	-	-	-	-	-	-	-	-	-	-	-	-
IT Admin	421,332	9,919	115,000	-	-	-	-	-	-	-	-	-	-	-	-
Data Mgt, Analytics & Reporting	22,236	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Project Mgmt & BP Support	7,208	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Data Center / Compute & Storage	852	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Data Management	72,753	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Network Engineering/Infrastructure	1,567	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Desktop & Field Support	18,523	115,374	-	-	-	-	-	-	-	-	-	-	-	-	-
Business Relationship Managers	442,957	226,718	-	-	-	-	-	-	-	-	-	-	-	-	-
Enterprise Information Security & Risk Mgmt	2,541	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Project Mgt Office - Project & Program Mgt	14,784	98,655	-	-	-	-	-	-	-	-	-	-	-	-	-
IT Maintenance	2,324,539	557,788	-	-	-	-	-	-	-	-	-	-	-	-	-
Asset & Vendor Managment	22,354	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Quality Assurance & Compliance	125	-	-	-	-	-	-	-	-	-	-	-	-	-	-
NERC	2,610,841	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Performance Opt, Benchmarking, Communications & Admin	10,779	-	-	-	-	-	-	-	-	-	-	-	-	-	-
PGS Operations	-	235,472	-	-	-	-	-	-	-	-	-	-	-	-	-
BIS - Customer Experience	2,255,626	1,165,785	-	-	-	-	-	-	-	-	-	-	-	-	-

Summary by organization:

Organization	Direct + Allocable	Direct	Allocable	TEC	PGS	NMGC	TECO Pipeline	Seacoast	TECO Partners	TECO Gemstone	TECO Energy	Emera Tech	TECO Services	Tampa Electric	PGS	NMGC	TECO Pipeline	Seacoast Gas Transmission	TECO Energy	TECO Partners	Emera, Inc.	Nova Scotia Power	Grand Bahama	Emera Caribbean	Emera Energy Services	Emera Technologies	US Sub 1	Teco Finance
Legal Services	5,624,633	3,017,807	2,606,826	1,688,121	706,359	593,257	16,093	-	639	-	1,358	-	-	2,291,133	615,244	37,032	-	6,995	21,116	46,287	-	-	-	-	-	-	-	-
State/Comm Affairs	441,072	398,056	43,016	32,137	6,199	4,297	383	-	-	-	-	-	-	-	-	-	-	-	398,056	-	-	-	-	-	-	-	-	-
Finance	8,603,359	1,665,564	6,937,795	4,993,040	1,157,218	697,779	52,033	13,751	23,028	-	2,947	-	-	953,744	429,193	229,324	-	3,704	-	6,292	29,266	-	-	10,265	-	-	-	3,776
Safety & Security	754,749	220,773	533,976	326,579	89,706	109,255	-	-	8,437	-	-	-	-	220,773	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Customer Experience												-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	6,949,926	741,823	6,208,103	4,458,619	1,112,009	507,334	-	-	95,908	34,233	-	-	-	740,628	1,195	-	-	-	-	-	-	-	-	-	-	-	-	-
Procurement	5,680,751	8,870	5,671,881	4,535,490	1,025,158	62,630	-	-	48,603	-	-	-	-	8,870	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	38,393,764	10,753,728	27,638,036	17,887,889	4,944,440	4,234,147	-	-	465,555	-	-	-	-	8,229,017	2,409,711	115,000	-	-	-	-	-	-	-	-	-	-	-	-
Corporate	19,022,780		19,022,780	14,123,643	3,027,252	1,664,581	148,296	-	59,008	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	**85,469,033**	**16,806,621**	**68,662,412**	**48,154,518**	**12,068,347**	**7,673,276**	**216,805**	**13,751**	**697,178**	**34,233**	**4,304**	**-**	**-**	**12,444,165**	**3,455,343**	**381,356**	**-**	**10,699**	**419,172**	**52,579**	**29,266**	**-**	**-**	**10,265**	**-**	**-**	**-**	**3,776**

Check Figure

Check Figure

Charges:

Charge	Direct + Allocable	Direct	Allocable	TEC	PGS	NMGC	TECO Pipeline	Seacoast	TECO Partners	TECO Gemstone	TECO Energy	Emera Tech	TECO Services	Tampa Electric	PGS	NMGC	TECO Pipeline	Seacoast Gas Transmission	TECO Energy	TECO Partners	Emera, Inc.	Nova Scotia Power	Grand Bahama	Emera Caribbean	Emera Energy Services	Emera Technologies	US Sub 1	Teco Finance
Corporate Overhead Allocation	$ 29,441,551	$ 5,081,427	$ 24,360,124	$ 18,195,648	$ 3,510,294	$ 2,433,576	$ 216,805	$ -	$ -	$ -	$ -	$ -	$ -	$ 3,244,877	$ 1,044,437	$ 266,356	$ -	$ 10,699	$ 419,172	$ 52,579	$ 29,266	$ -	$ -	$ 10,265	$ -	$ -	$ -	$ 3,776
IT Charges	$ 38,393,764	$ 10,753,728	$ 27,638,036	$ 17,887,889	$ 4,944,440	$ 4,234,147	$ -	$ -	$ 465,555	$ -	$ -	$ -	$ -	$ 8,229,017	$ 2,409,711	$ 115,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
HR Benefits Admin Charges	$ 3,003,143	$ 207	$ 3,002,936	$ 2,088,299	$ 478,668	$ 446,038	$ -	$ -	$ 41,741	$ 34,233	$ -	$ -	$ -	$ 207	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
HREmplRel Charges	$ 3,946,783	$ 741,616	$ 3,205,167	$ 2,456,363	$ 633,341	$ 59,296	$ -	$ -	$ 56,167	$ -	$ -	$ -	$ -	$ 740,421	$ 1,195	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement Charges	$ 4,093,444	$ -	$ 4,093,444	$ 3,321,830	$ 691,792	$ 62,630	$ -	$ -	$ 17,193	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Admin Services Charges	$ 1,587,307	$ 8,870	$ 1,578,437	$ 1,213,660	$ 333,366	$ -	$ -	$ -	$ 31,411	$ -	$ -	$ -	$ -	$ 8,870	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
EmerMgmt Charges	$ 754,749	$ 220,773	$ 533,976	$ 326,579	$ 89,706	$ 109,255	$ -	$ -	$ 8,437	$ -	$ -	$ -	$ -	$ 220,773	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
AcctsPay Charges	$ 1,091,352	$ -	$ 1,091,352	$ 623,162	$ 314,746	$ 113,719	$ -	$ 13,751	$ 23,028	$ -	$ 2,947	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Claims Charges	$ 798,636	$ -	$ 798,636	$ 338,222	$ 445,799	$ 12,618	$ -	$ -	$ 639	$ -	$ 1,358	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Document Services Charges												$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Payroll Charges												$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Corp Comm Charges	$ 2,360,305	$ -	$ 2,360,305	$ 1,675,108	$ 626,189	$ -	$ -	$ -	$ 59,008	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total	**85,469,033**	**16,806,621**	**68,662,412**	**48,154,518**	**12,068,347**	**7,673,276**	**216,805**	**13,751**	**697,178**	**34,233**	**4,304**	**-**	**-**	**12,444,165**	**3,455,343**	**381,356**	**-**	**10,699**	**419,172**	**52,579**	**29,266**	**-**	**-**	**10,265**	**-**	**-**	**-**	**3,776**

TECO TAMPA ELECTRIC AN EMERA COMPANY

2021 TOTAL

Per EPM

Organization	Department	Assessment Factor	Cost Center	Direct + Allocable Total Cost	Direct Total Cost	Allocable Total Cost	Allocable TEC	Allocable PGS	Allocable NMGC	Allocable TECO Pipeline	Allocable Seacoast	Allocable TECO Partners	Allocable TECO Gemstone	Allocable TECO Energy	Allocable Emera Technologies	Direct Tampa Electric	Direct PGS	Direct NMGC	Direct TECO Pipeline	Direct Seacoast Gas	Direct TECO Energy	Direct TECO Partners	Direct Emera, Inc.	Direct Nova Scotia Power	Direct Grand Bahama	Direct Emera Caribbean	Direct Emera Energy	Direct Emera Technolog	Direct US Sub 1	Direct Teco Finance
Legal Services	VP General Counsel	MMM	A230060	544,728	-	544,728	411,651	77,188	50,333	5,556	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Legal Services	Corporate Secretary	MMM	A230062	366,271	169,394	196,877	148,780	27,897	18,191	2,008	-	-	-	-	-	76,788	52,167	36,345	-	4,094	-	-	-	-	-	-	-	-	-	-
Legal Services	Legal Services	MMM	A230092	2,246,839	1,548,047	698,792	528,077	99,019	64,568	7,128	-	-	-	-	-	1,087,758	382,477	-	-	3,307	33,725	40,780	-	-	-	-	-	-	-	-
Legal Services	Claims	Claims	A230048	789,953	-	789,953	288,886	494,748	4,661	-	-	790	-	869	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Legal Services	Compliance	MMM	A230055	528,124	-	528,124	399,103	74,835	48,799	5,387	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
State/Comm Affairs	Federal Affairs	MMM	A230054	595,834	491,697	104,137	78,696	14,756	9,622	1,062	-	-	-	-	-	-	-	-	-	-	491,697	-	-	-	-	-	-	-	-	-
Legal Services	Real Estate	N/A		1,457,456	1,457,456	-	-	-	-	-	-	-	-	-	-	1,351,907	103,094	-	-	-	2,455	-	-	-	-	-	-	-	-	-
Finance	Accounts Payable	Invoices	A261001	1,399,204	52,691	1,346,513	620,608	452,562	155,506	-	83,154	21,119	-	13,564	-	52,691	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Finance	Energy Risk	MMM	A230073	373,994	215,902	158,092	119,470	22,402	14,608	1,613	-	-	-	-	-	124,191	71,331	20,380	-	-	-	-	-	-	-	-	-	-	-	-
Finance	Insurance Risk	MMM	A230085	305,382	182,498	122,884	92,863	17,413	11,354	1,253	-	-	-	-	-	91,674	45,412	45,412	-	-	-	-	-	-	-	-	-	-	-	-
Finance	Treasury	MMM	A230087	605,220	-	605,220	457,365	85,760	55,922	6,173	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Finance	Corporate Tax	MMM	A230086	1,604,459	1,329,244	275,215	207,980	38,998	25,430	2,807	-	-	-	-	-	924,661	252,614	130,782	-	5,756	-	9,675	-	-	-	-	-	-	-	5,756
Finance	Corporate Accounting	MMM	A230088	2,547,841	92,020	2,455,821	1,855,864	347,990	226,918	25,049	-	-	-	-	-	91,093	330	-	-	-	-	597	-	-	-	-	-	-	-	-
Finance	Audit Services	MMM	A230089	1,180,259	46,682	1,133,577	856,644	160,628	104,742	11,562	-	-	-	-	-	-	-	-	-	-	-	-	204	22,591	21,666	2,221	-	-	-	-
Finance	Pension Investments	MMM		338,925	-	338,925	256,126	48,026	31,317	3,457	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Finance	Planning & Budgets	MMM	A234519	411,710	345	411,365	310,869	58,290	38,010	4,196	-	-	-	-	-	345	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Procurement	Document Services	Headcount	A232039	666,355	7,974	658,381	500,368	144,844	-	-	-	13,168	-	-	-	7,974	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	Payroll	Headcount	A233551	443,381	-	443,381	294,893	78,390	57,773	-	-	7,227	5,099	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Corporate	Corporate Responsibility	MMM		15,139,927	-	15,139,927	11,441,243	2,145,328	1,398,929	154,427	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Corporate	Other Corporate	MMM		207	-	207	157	29	19	2	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Corporate	Corporate Communications	Headcount	A251002	2,276,410	-	2,276,410	1,784,250	492,160	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Safety & Security	Corporate Security	N/A	A231003	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Safety & Security	Emergency Management	Headcount	A231004	814,202	258,769	555,433	336,204	98,978	111,142	-	-	9,109	-	-	-	258,769	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	HR Admin	Headcount	A233549	33	-	33	22	6	4	-	-	1	0	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	Healthcare	Headcount	A233552	534,841	-	534,841	355,723	94,560	69,690	-	-	8,718	6,151	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	Retirement	Headcount	553	270,135	220	269,915	179,521	47,721	35,170	-	-	4,400	3,104	-	-	220	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	Benefits Admin	Headcount	A233554	1,057,914	-	1,057,914	703,618	187,039	137,846	-	-	17,244	12,166	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	Compensation	Headcount	A233556	412,771	-	412,771	274,534	72,978	53,784	-	-	6,728	4,747	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	HR Managers	Headcount	A233550	1,135,583	1,130,271	5,312	3,941	1,160	104	-	-	107	-	-	-	1,130,271	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	Assessment & Development	Headcount	557	39,510	27,062	12,448	9,235	2,719	244	-	-	250	-	-	-	27,062	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	Training & Development	Headcount	A233555	615,684	49,945	565,739	419,721	123,557	11,088	-	-	11,373	-	-	-	49,147	760	-	-	38	-	-	-	-	-	-	-	-	-	-
Human Resources	Recruitment & Staffing	Headcount	A233558	831,822	1,412	830,410	616,081	181,362	16,276	-	-	16,691	-	-	-	1,412	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	Employee Relations Admin	Headcount	559	191,348	3,823	187,525	139,125	40,956	3,675	-	-	3,769	-	-	-	3,823	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	HRIS	Headcount		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	Labor Relations	Headcount	A233560	515,943	15,444	500,499	371,320	109,309	9,810	-	-	10,060	-	-	-	15,444	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Procurement	Procurement Admin	PO Spend	A232030	575,712	-	575,712	459,360	106,334	8,175	-	-	1,842	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Procurement	Purchase & Inventory Management	PO Spend	A232029	1,130,637	-	1,130,637	902,135	208,829	16,055	-	-	3,618	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Procurement	Supplier Diversity	PO Spend	A232028	748,665	-	748,665	597,360	138,278	10,631	-	-	2,396	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Procurement	Contracts Admin	PO Spend	A232034	1,998,004	-	1,998,004	1,594,207	369,031	28,372	-	-	6,394	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Procurement	Record Retention	Headcount	A232032	69,555	-	69,555	52,862	15,302	-	-	-	1,391	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Procurement	Duplicating	Headcount	A232036	179,472	-	179,472	136,399	39,484	-	-	-	3,589	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Procurement	Mailroom	Headcount	A232038	673,167	-	673,167	511,607	148,097	-	-	-	13,463	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	IT Allocable Costs (Telecom/Facilities Overhead)- Vacancy	Headcount	A231500	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	IT Allocable Costs (Telecom/Facilities Overhead)	Headcount	A231500	3,263,260	-	3,263,260	2,098,276	621,651	486,878	-	-	56,454	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	IT Admin	Headcount	A231505	3,505,633	256,048	3,249,585	2,089,483	619,046	484,838	-	-	56,218	-	-	-	253,001	3,048	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	ED/ES Leadership	Headcount	A231538	262,924	262,203	721	463	137	108	-	-	12	-	-	-	262,203	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	ED/ES Delivery Control Systems	Headcount	A231539	542,415	542,415	-	-	-	-	-	-	-	-	-	-	542,415	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	ED/ES Work & Asset Management Systems	Headcount		288,364	283,306	5,058	3,252	964	755	-	-	88	-	-	-	283,306	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Project Mgmt - ED & ES	Headcount	A231557		-											-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	BRM & BSA - ED & ES	Headcount	A231556		-											-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Data Mgt, Analytics & Reporting	Headcount	A231540	814,442	215,615	598,828	385,046	114,077	89,345	-	-	10,360	-	-	-	215,615	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Innovation, Automation & Emerging Tech	Headcount	A231501	51,467	51,467	-	-	-	-	-	-	-	-	-	-	51,467	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Project Mgmt - ADS	Headcount		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Project Mgmt & BP Support	Headcount	A231517	615,441	2,745	612,696	393,964	116,719	91,414	-	-	10,600	-	-	-	2,745	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Data Center / Compute & Storage	Headcount	A231506	996,504	-	996,504	640,752	189,834	148,678	-	-	17,240	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Data Management	Headcount	A231511	524,776	15,680	509,096	327,349	96,983	75,957	-	-	8,807	-	-	-	15,680	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Network Engineering/Infrastructure	Headcount	A231527	650,560	416,954	233,606	150,208	44,502	34,854	-	-	4,041	-	-	-	416,954	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Cyber Security Operations	Headcount	A231529	1,016,176	76	1,016,100	653,352	193,567	151,602	-	-	17,579	-	-	-	76	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Service Desk	Headcount		833,590	-	833,590	535,999	158,799	124,372	-	-	14,421	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Desktop & Field Support	Headcount		771,595	190,156	581,439	373,865	110,764	86,751	-	-	10,059	-	-	-	78,210	111,946	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Data Center / Network & Enterprise Hardening	Headcount	A231521	1,508,755	-	1,508,755	970,129	287,418	225,106	-	-	26,101	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Compliance Ops	Headcount		419,791	340	419,451	269,707	79,905	62,582	-	-	7,257	-	-	-	340	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Hosting & Cloud	Headcount	A231542	393,690	-	393,690	253,143	74,998	58,739	-	-	6,811	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Digital Collaboration	Headcount	A231514	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Service Mgmt	Headcount		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Remote Access & Desktop Engineering	Headcount		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Cyber Security Architecture	Headcount		20,017	20,017	-	-	-	-	-	-	-	-	-	-	-	7,566	12,450	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Business Relationship Managers	Headcount	A231504	717,990	739,745	(21,755)	(13,988)	(4,144)	(3,246)	-	-	(376)	-	-	-	513,059	226,686	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Enterprise Architecture & IT DR/BC	Headcount	A231509	365,451	-	365,451	234,985	69,618	54,525	-	-	6,322	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Enterprise Information Security & Risk Mgmt	Headcount	A231515	504,710	891	503,819	323,955	95,977	75,170	-	-	8,716	-	-	-	891	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Project Mgt Office - Project & Program Mgt	Headcount	A231513	2,003,373	25,620	1,977,753	1,271,695	376,762	295,081	-	-	34,215	-	-	-	25,620	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Project Mgt Office - BSA	Headcount	A231530	850,601	270,030	580,571	373,307	110,599	86,621	-	-	10,044	-	-	-	270,030	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Project Mgt Office - TaaS	Headcount		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	IT Maintenance	Headcount	A231522	9,405,018	3,392,806	6,012,212	3,865,852	1,145,326	897,022	-	-	104,011	-	-	-	2,830,636	562,171	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Asset & Vendor Management	Headcount	A231525	714,272	36,755	677,517	435,644	129,067	101,086	-	-	11,721	-	-	-	36,755	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Quality Assurance & Compliance	Headcount	A231524	582,263	116,022	466,240	299,792	88,819	69,563	-	-	8,066	-	-	-	78	55,099	60,845	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	NERC	Headcount	(516)F231520/F23152	2,265,209	2,265,209	-	-	-	-	-	-	-	-	-	-	2,265,209	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Project Mgmt - Compliance	Headcount		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	BRM & BSA - Compliance	Headcount		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Performance Opt, Benchmarking, Communications & Admin	Headcount	A231523	259,043	10,779	248,264	159,634	47,294	37,041	-	-	4,295	-	-	-	10,779	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	PGS Operations	Headcount	A231510	604,685	596,084	8,602	5,531	1,639	1,283	-	-	149	-	-	-	-	596,084	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	PGS Work & Asset Mgmt	Headcount		10,988	-	10,988	7,066	2,093	1,639	-	-	190	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	BIS - Customer Experience	Headcount		2,187,417	2,012,842	174,574	112,251	33,256	26,046	-	-	3,020	-	-	-	1,353,448	659,394	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	IT Corporate Operations	Headcount	A231532	852,233	-	852,233	547,986	162,350	127,153	-	-	14,744	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Identity Access & HR	Headcount	A231533	1,262,002	-	1,262,002	811,467	240,411	188,291	-	-	21,833	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Coporate Business Solutions	Headcount	A231528	1,720,083	127,084	1,592,999	1,024,298	303,466	237,675	-	-	27,559	-	-	-	127,084	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Corporate Technology Solutions	Headcount		727,567	-	727,567	467,825	138,601	108,553	-	-	12,587	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Project Mgmt - IT & Corp	Headcount		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	BRM & BSA - IT & Corp	Headcount		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	Strategic Technology Initiatives & Governance	Headcount		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

	Direct + Allocable Total Cost	Direct Total Cost	Allocable Total Cost	TEC	PGS	NMGC	TECO Pipeline	Seacoast	TECO Partners	TECO Gemstone	TECO Energy	Emera Technologies	Tampa Electric	PGS	NMGC	TECO Pipeline	Seacoast Gas	TECO Energy	TECO Partners	Emera, Inc.	Nova Scotia Power	Grand Bahama	Emera Caribbean	Emera Energy	Emera Technolog	US Sub 1	Teco Finance
Legal Services	5,933,371	3,174,897	2,758,474	1,776,497	773,687	186,552	20,079	-	790	-	869	-	2,516,453	537,738	36,345	-	7,401	36,180	40,780	-	-	-	-	-	-	-	-
State/Comm Affairs	595,834	491,697	104,137	78,696	14,756	9,622	1,062	-	-	-	-	-	-	-	-	-	-	491,697	-	-	-	-	-	-	-	-	-
Finance	8,766,993	1,919,382	6,847,611	4,777,787	1,232,068	663,807	56,111	83,154	21,119	-	13,564	-	1,284,655	369,687	196,574	-	5,756	-	10,272	204	22,591	21,666	2,221	-	-	-	5,756
Safety & Security	814,202	258,769	555,433	336,204	98,978	111,142	-	-	9,109	-	-	-	258,769	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Customer Experience	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	6,048,964	1,228,177	4,820,787	3,367,734	939,756	395,465	-	-	86,566	31,267	-	-	1,227,379	760	-	-	38	-	-	-	-	-	-	-	-	-	-
Procurement	6,041,566	7,974	6,033,592	4,754,299	1,170,199	63,233	-	-	45,861	-	-	-	7,974	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	41,512,305	11,850,891	29,661,415	19,072,290	5,650,499	4,425,483	-	-	513,142	-	-	-	9,555,602	2,221,994	73,295	-	-	-	-	-	-	-	-	-	-	-	-
Corporate	17,416,544	-	17,416,544	13,225,649	2,637,517	1,398,948	154,429	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	**87,129,779**	**18,931,786**	**68,197,993**	**47,389,157**	**12,517,460**	**7,254,253**	**231,682**	**83,154**	**676,588**	**31,267**	**14,433**	**-**	**14,850,832**	**3,130,179**	**306,214**	**-**	**13,195**	**527,877**	**51,052**	**204**	**22,591**	**21,666**	**2,221**	**-**	**-**	**-**	**5,756**
Check Figure	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Check Figure			(0)																								
Corporate Overhead Allocation	28,247,175	5,533,285	22,713,891	17,164,887	3,218,558	2,098,764	231,682	-	-	-	-	-	3,748,417	907,425	232,919	-	13,157	527,877	51,052	204	22,591	21,666	2,221	-	-	-	5,756
IT Charges	41,512,305	11,850,891	29,661,415	19,072,290	5,650,499	4,425,483	-	-	513,142	-	-	-	9,555,602	2,221,994	73,295	-	-	-	-	-	-	-	-	-	-	-	-
HR Benefits Admin Charges	2,719,075	220	2,718,855	1,808,311	480,694	354,267	-	-	44,317	31,267	-	-	220	-	-	-	-	-	-	-	-	-	-	-	-	-	-
HREmpRel Charges	3,329,889	1,227,957	2,101,932	1,559,423	459,062	41,198	-	-	42,249	-	-	-	1,227,159	760	-	-	38	-	-	-	-	-	-	-	-	-	-
Procurement Charges	4,453,017	-	4,453,017	3,553,063	822,472	63,233	-	-	14,250	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Admin Services Charges	1,588,548	7,974	1,580,574	1,201,237	347,726	-	-	-	31,611	-	-	-	7,974	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EmerMgmt Charges	814,202	258,769	555,433	336,204	98,978	111,142	-	-	9,109	-	-	-	258,769	-	-	-	-	-	-	-	-	-	-	-	-	-	-
AcctsPay Charges	1,399,204	52,691	1,346,513	620,608	452,562	155,506	-	83,154	21,119	-	13,564	-	52,691	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Claims Charges	789,953	-	789,953	288,886	494,748	4,661	-	-	790	-	869	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Document Services Charges	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Payroll Charges	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Corp Comm Charges	2,276,410	-	2,276,410	1,784,250	492,160	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	**87,129,779**	**18,931,786**	**68,197,993**	**47,389,157**	**12,517,460**	**7,254,253**	**231,682**	**83,154**	**676,588**	**31,267**	**14,433**	**-**	**14,850,832**	**3,130,179**	**306,214**	**-**	**13,195**	**527,877**	**51,052**	**204**	**22,591**	**21,666**	**2,221**	**-**	**-**	**-**	**5,756**
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

TECO TAMPA ELECTRIC AN EMERA COMPANY

2022 TOTAL

Organization	Department	Assessment Facto	Cost Cente	Direct + Allocable Total Cost	Direct Total Cost	Allocable Total Cost	Allocable TEC	Allocable PGS	Allocable NMGC	Allocable TECO Pipeline	Allocable Seacoast	Allocable TECO Partners	Allocable TECO Gemstone	Allocable TECO Energy	Allocable Emera Technologies	Direct Tampa Electric	Direct PGS	Direct NMGC	Direct TECO Pipeline	Direct Seacoast Gas Transmission	Direct TECO Energy	Direct TECO Partners	Direct Emera, Inc.	Direct Nova Scotia Power	Direct Grand Bahama	Direct Emera Caribbean (incl Barbados)	Direct Emera Energy Services	Direct Emera Technologies	Direct US Sub 1	Direct Teco Finance
Legal Services	VP General Counsel	MMM	A230060	$ 611,782	$ -	$ 611,782	$ 444,827	$ 97,640	$ 61,974	$ 7,341	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Legal Services	Corporate Secretary	MMM	A230062	$ 173,060	$ -	$ 173,060	$ 125,832	$ 27,620	$ 17,531	$ 2,077	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Legal Services	Legal Services	MMM	A230092	$ 766,358	$ 109,817	$ 656,541	$ 477,371	$ 104,784	$ 66,508	$ 7,878	$ -	$ -	$ -	$ -	$ -	$ 62,590	$ 26,338	$ 18,770	$ -	$ 2,119	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Legal Services	Claims	Claims	A230048	$ 2,306,530	$ 1,563,597	$ 742,933	$ 221,543	$ 514,258	$ 6,092	$ -	$ -	$ 297	$ -	$ 743	$ -	$ 1,059,990	$ 367,947	$ -	$ -	$ 3,588	$ 101,171	$ 30,901	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Legal Services	Compliance	MMM	A230055	$ 596,109	$ -	$ 596,109	$ 433,431	$ 95,139	$ 60,386	$ 7,153	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
State/Comm Affai	Federal Affairs	MMM	A230054	$ 126,530	$ 5,144	$ 121,386	$ 88,260	$ 19,373	$ 12,296	$ 1,457	$ -	$ -	$ -	$ -	$ -	$ 5,144	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Legal Services	Real Estate	N/A		$ 579,392	$ 579,392	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 579,392	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Finance	Accounts Payable	Invoices	A261001	$ 3,162,184	$ 1,467,164	$ 1,695,020	$ 806,490	$ 616,648	$ 197,978	$ -	$ 47,122	$ 19,154	$ -	$ 7,628	$ -	$ 1,381,512	$ 83,576	$ -	$ -	$ -	$ 2,076	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Finance	Energy Risk	MMM	A230073	$ 58,950	$ 27,234	$ 31,716	$ 23,061	$ 5,062	$ 3,213	$ 381	$ -	$ -	$ -	$ -	$ -	$ 27,234	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Finance	Insurance Risk	MMM	A230085	$ 310,026	$ 166,523	$ 143,503	$ 104,341	$ 22,903	$ 14,537	$ 1,722	$ -	$ -	$ -	$ -	$ -	$ 130,455	$ 28,053	$ 8,015	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Finance	Treasury	MMM	A230087	$ 938,418	$ 158,482	$ 779,936	$ 567,092	$ 124,478	$ 79,008	$ 9,359	$ -	$ -	$ -	$ -	$ -	$ 89,276	$ 34,603	$ 34,603	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Finance	Corporate Tax	MMM	A230086	$ 264,762	$ 14,793	$ 249,969	$ 181,752	$ 39,895	$ 25,322	$ 3,000	$ -	$ -	$ -	$ -	$ -	$ -	$ 14,793	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Finance	Corporate Accountir	MMM	A230088	$ 4,197,718	$ 1,500,416	$ 2,697,302	$ 1,961,208	$ 430,489	$ 273,237	$ 32,368	$ -	$ -	$ -	$ -	$ -	$ 1,281,113	$ 128,001	$ 64,051	$ -	$ 6,560	$ 3,197	$ 10,934	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 6,560
Finance	Audit Services	MMM	A230089	$ 965,761	$ 10,408	$ 955,353	$ 694,637	$ 152,474	$ 96,777	$ 11,464	$ -	$ -	$ -	$ -	$ -	$ 10,408	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Finance	Pension Investment	MMM		$ 617,201	$ 225,468	$ 391,733	$ 284,829	$ 62,521	$ 39,683	$ 4,701	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 116,316	$ 83,727	$ 3,821	$ 5,968	$ 15,636	$ -	$ -	$ -
Finance	Planning & Budgets	MMM	A234519	$ 428,236	$ -	$ 428,236	$ 311,370	$ 68,346	$ 43,380	$ 5,139	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement	Document Services	Headcount	A232039	$ 455,107	$ 548	$ 454,559	$ 342,283	$ 103,185	$ -	$ -	$ -	$ 9,091	$ -	$ -	$ -	$ 240	$ 308	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Payroll	Headcount	A233551	$ 506,584	$ -	$ 506,584	$ 348,935	$ 70,517	$ 76,849	$ -	$ -	$ 6,282	$ 4,002	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Corporate	Corporate Responsil	MMM		$ 17,533,673	$ -	$ 17,533,673	$ 12,748,734	$ 2,798,374	$ 1,776,161	$ 210,404	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Corporate	Other Corporate	MMM		$ 64,539	$ -	$ 64,539	$ 46,926	$ 10,300	$ 6,538	$ 774	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Safety & Security	Corporate Security	N/A	A231003	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Safety & Security	Emergency Manager	Headcount	A231004	$ 590,212	$ -	$ 590,212	$ 354,009	$ 106,710	$ 120,108	$ -	$ -	$ 9,384	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	HR Admin	Headcount	A233549	$ 261,485	$ 260,320	$ 1,165	$ 803	$ 162	$ 177	$ -	$ -	$ 14	$ 9	$ -	$ -	$ 233,575	$ 11,600	$ 15,145	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Healthcare	Headcount	A233552	$ 506,076	$ -	$ 506,076	$ 348,585	$ 70,446	$ 76,772	$ -	$ -	$ 6,275	$ 3,998	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Retirement	Headcount	553	$ 259,533	$ -	$ 259,533	$ 178,766	$ 36,127	$ 39,371	$ -	$ -	$ 3,218	$ 2,050	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Benefits Admin	Headcount	A233554	$ 1,147,879	$ 1,824	$ 1,146,055	$ 789,402	$ 159,531	$ 173,856	$ -	$ -	$ 14,211	$ 9,054	$ -	$ -	$ 1,824	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Compensation	Headcount	A233556	$ 644,303	$ 162,683	$ 481,620	$ 331,740	$ 67,041	$ 73,062	$ -	$ -	$ 5,972	$ 3,805	$ -	$ -	$ 162,683	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	HR Managers	Headcount	A233550	$ 3,659	$ 43	$ 3,616	$ 3,450	$ 75	$ 85	$ -	$ -	$ 7	$ -	$ -	$ -	$ -	$ 39	$ -	$ -	$ -	$ -	$ 4	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Assessment & Devel	Headcount	557	$ 1,134,168	$ 1,118,975	$ 15,193	$ 14,494	$ 316	$ 356	$ -	$ -	$ 27	$ -	$ -	$ -	$ 1,118,975	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Training & Developm	Headcount	A233555	$ 499,452	$ -	$ 499,452	$ 476,478	$ 10,389	$ 11,687	$ -	$ -	$ 899	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Recruitment & Staffi	Headcount	A233558	$ 935,910	$ 71,430	$ 864,480	$ 824,714	$ 17,981	$ 20,229	$ -	$ -	$ 1,556	$ -	$ -	$ -	$ 71,430	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Employee Relations	Headcount	559	$ 439,922	$ 255,598	$ 184,324	$ 175,845	$ 3,834	$ 4,313	$ -	$ -	$ 332	$ -	$ -	$ -	$ 255,598	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	HRIS	Headcount		$ 9,899	$ 9,899	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 9,899	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Labor Relations	Headcount	A233560	$ 472,292	$ -	$ 472,292	$ 450,567	$ 9,824	$ 11,052	$ -	$ -	$ 850	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement	Procurement Admin	PO Spend	A232030	$ 640,919	$ 13,789	$ 627,130	$ 498,004	$ 115,517	$ 11,853	$ -	$ -	$ 1,756	$ -	$ -	$ -	$ 13,789	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement	Purchase & Inventor	PO Spend	A232029	$ 1,103,582	$ -	$ 1,103,582	$ 876,354	$ 203,280	$ 20,858	$ -	$ -	$ 3,090	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement	Supplier Diversity	PO Spend	A232028	$ 703,997	$ -	$ 703,997	$ 559,044	$ 129,676	$ 13,306	$ -	$ -	$ 1,971	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement	Contracts Admin	PO Spend	A232034	$ 2,120,506	$ -	$ 2,120,506	$ 1,683,894	$ 390,597	$ 40,078	$ -	$ -	$ 5,937	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement	Record Retention	Headcount	A232032	$ 133,616	$ -	$ 133,616	$ 100,613	$ 30,331	$ -	$ -	$ -	$ 2,672	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement	Duplicating	Headcount	A232036	$ 269,400	$ -	$ 269,400	$ 202,858	$ 61,154	$ -	$ -	$ -	$ 5,388	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement	Mailroom	Headcount	A232038	$ 698,293	$ -	$ 698,293	$ 525,815	$ 158,513	$ -	$ -	$ -	$ 13,966	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	IT Allocable Costs (1	Headcount	A231500	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	IT Allocable Costs (1	Headcount	A231500	$ 3,313,760	$ -	$ 3,313,760	$ 2,143,671	$ 651,154	$ 468,234	$ -	$ -	$ 50,701	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	IT Admin	Headcount	A231505	$ 3,804,097	$ -	$ 3,804,097	$ 2,460,870	$ 747,505	$ 537,519	$ -	$ -	$ 58,203	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	ED/ES Leadership	Headcount	A231538	$ 492,363	$ 490,663	$ 1,700	$ 1,100	$ 334	$ 240	$ -	$ -	$ 26	$ -	$ -	$ -	$ 490,663	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	ED/ES Delivery Cont	Headcount	A231539	$ 500,023	$ 500,023	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 500,023	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	ED/ES Work & Asset	Headcount		$ 822,001	$ 820,492	$ 1,509	$ 976	$ 297	$ 213	$ -	$ -	$ 23	$ -	$ -	$ -	$ 820,492	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Project Mgmt - ED &	Headcount	A231557		$ 282,991											$ 282,991	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	BRM & BSA - ED & ES	Headcount	A231556		$ -											$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Data Mgt, Analytics	Headcount	A231540	$ 550,051	$ -	$ 550,051	$ 355,828	$ 108,085	$ 77,722	$ -	$ -	$ 8,416	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Innovation, Automat	Headcount	A231501	$ 168,331	$ 1,167	$ 167,164	$ 108,138	$ 32,848	$ 23,620	$ -	$ -	$ 2,558	$ -	$ -	$ -	$ 1,167	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Project Mgmt - ADS	Headcount		$ 374	$ 374	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 374	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Project Mgmt & BP S	Headcount	A231517	$ 993,774	$ -	$ 993,774	$ 642,873	$ 195,277	$ 140,420	$ -	$ -	$ 15,205	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Data Center / Comp	Headcount	A231506	$ 1,079,527	$ 29,393	$ 1,050,134	$ 679,331	$ 206,351	$ 148,384	$ -	$ -	$ 16,067	$ -	$ -	$ -	$ 29,393	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Data Management	Headcount	A231511	$ 462,456	$ 193	$ 462,263	$ 299,038	$ 90,835	$ 65,318	$ -	$ -	$ 7,073	$ -	$ -	$ -	$ 193	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Network Engineerin	Headcount	A231527	$ 363,028	$ 0	$ 363,028	$ 234,843	$ 71,335	$ 51,296	$ -	$ -	$ 5,554	$ -	$ -	$ -	$ 0	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Cyber Security Oper	Headcount	A231529	$ 1,642,943	$ 375,826	$ 1,267,117	$ 819,698	$ 248,988	$ 179,044	$ -	$ -	$ 19,387	$ -	$ -	$ -	$ 375,826	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Service Desk	Headcount		$ 915,406	$ -	$ 915,406	$ 592,176	$ 179,877	$ 129,347	$ -	$ -	$ 14,006	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Desktop & Field Sup	Headcount		$ 480,196	$ 700	$ 479,496	$ 310,186	$ 94,221	$ 67,753	$ -	$ -	$ 7,336	$ -	$ -	$ -	$ 700	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Data Center / Netwo	Headcount	A231521	$ 1,991,987	$ 72,982	$ 1,919,005	$ 1,241,404	$ 377,084	$ 271,155	$ -	$ -	$ 29,361	$ -	$ -	$ -	$ 49,427	$ 23,555	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Compliance Ops	Headcount		$ 551,653	$ 375	$ 551,278	$ 356,622	$ 108,326	$ 77,896	$ -	$ -	$ 8,435	$ -	$ -	$ -	$ 375	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Hosting & Cloud	Headcount	A232542	$ 529,979	$ 204	$ 529,775	$ 342,712	$ 104,101	$ 74,857	$ -	$ -	$ 8,106	$ -	$ -	$ -	$ 204	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Digital Collaboratior	Headcount	A231514	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Service Mgmt	Headcount		$ 1,166,133	$ 1,166,133	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 933,735	$ 259,729	$ (27,331)	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Remote Access & De	Headcount		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Cyber Security Archi	Headcount		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Business Relationsh	Headcount	A231504	$ 37,110	$ 34,996	$ 2,113	$ 1,367	$ 415	$ 299	$ -	$ -	$ 32	$ -	$ -	$ -	$ -	$ 12,849	$ 22,147	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Enterprise Architect	Headcount	A231509	$ 1,110,271	$ 610,278	$ 499,993	$ 323,445	$ 98,249	$ 70,649	$ -	$ -	$ 7,650	$ -	$ -	$ -	$ 541,950	$ 68,328	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Enterprise Informati	Headcount	A231515	$ 248,862	$ -	$ 248,862	$ 160,989	$ 48,901	$ 35,164	$ -	$ -	$ 3,808	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Project Mgt Office -	Headcount	A231513	$ 1,271,111	$ -	$ 1,271,111	$ 822,281	$ 249,773	$ 179,608	$ -	$ -	$ 19,448	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Project Mgt Office -	Headcount	A231530	$ 1,493,421	$ 679,644	$ 813,777	$ 526,432	$ 159,907	$ 114,987	$ -	$ -	$ 12,451	$ -	$ -	$ -	$ 558,635	$ 121,010	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Project Mgt Office -	Headcount		$ 450,949	$ 414,780	$ 36,169	$ 23,398	$ 7,107	$ 5,111	$ -	$ -	$ 553	$ -	$ -	$ -	$ 403,066	$ 11,713	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	IT Maintenance	Headcount	A231522	$ 7,479,246	$ 272,892	$ 7,206,354	$ 4,661,790	$ 1,416,049	$ 1,018,258	$ -	$ -	$ 110,257	$ -	$ -	$ -	$ 245,657	$ 27,235	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Asset & Vendor Man	Headcount	A231525	$ 4,133,658	$ 3,421,276	$ 712,382	$ 460,840	$ 139,983	$ 100,660	$ -	$ -	$ 10,899	$ -	$ -	$ -	$ 2,772,065	$ 649,211	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Quality Assurance &	Headcount	A231524	$ 578,566	$ 30,092	$ 548,474	$ 354,808	$ 107,775	$ 77,499	$ -	$ -	$ 8,392	$ -	$ -	$ -	$ 30,092	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	NERC	Headcount	'231520/F	$ 378,045	$ 378,045	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 627	$ 177,633	$ 199,785	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Project Mgmt - Com	Headcount		$ 2,140,269	$ 2,140,269	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 2,140,269	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	BRM & BSA - Compli	Headcount		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Performance Opt, B	Headcount	A231523	$ 244,554	$ -	$ 244,554	$ 158,202	$ 48,055	$ 34,556	$ -	$ -	$ 3,742	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	PGS Operations	Headcount	A231510	$ 34,169	$ 10,779	$ 23,390	$ 15,131	$ 4,596	$ 3,305	$ -	$ -	$ 358	$ -	$ -	$ -	$ 10,779	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	PGS Work & Asset M	Headcount		$ 485,198	$ 473,731	$ 11,467	$ 7,418	$ 2,253	$ 1,620	$ -	$ -	$ 175	$ -	$ -	$ -	$ 3,973	$ 469,758	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	BIS - Customer Expe	Headcount		$ 81,924	$ 78,936	$ 2,988	$ 1,933	$ 587	$ 422	$ -	$ -	$ 46	$ -	$ -	$ -	$ 9,159	$ 69,777	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	IT Corporate Operati	Headcount	A231532	$ 3,480,749	$ 2,602,039	$ 878,710	$ 568,438	$ 172,667	$ 124,162	$ -	$ -	$ 13,444	$ -	$ -	$ -	$ 1,755,972	$ 846,067	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Identity Access & H	Headcount	A231533	$ 916,951	$ -	$ 916,951	$ 593,175	$ 180,181	$ 129,565	$ -	$ -	$ 14,029	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Coporate Business S	Headcount	A231528	$ 2,121,071	$ 1,478	$ 2,119,593	$ 1,371,165	$ 416,500	$ 299,498	$ -	$ -	$ 32,430	$ -	$ -	$ -	$ 1,478	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Corporate Technolo	Headcount		$ 934,346	$ 199,505	$ 734,840	$ 475,368	$ 144,396	$ 103,833	$ -	$ -	$ 11,243	$ -	$ -	$ -	$ 199,505	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Project Mgmt - IT &	Headcount		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	BRM & BSA - IT & Co	Headcount		$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Techr	Strategic Technolog	Headcount		$ 156,217	$ -	$ 156,217	$ 101,057	$ 30,697	$ 22,073	$ -	$ -	$ 2,390	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -

	Direct + Allocable Total Cost	Direct Total Cost	Allocable Total Cost	Allocable TEC	Allocable PGS	Allocable NMGC	Allocable TECO Pipeline	Allocable Seacoast	Allocable TECO Partners	Allocable TECO Gemstone	Allocable TECO Energy	Allocable Emera Technologies	Direct Tampa Electric	Direct PGS	Direct NMGC	Direct TECO Pipeline	Direct Seacoast Gas Transmission	Direct TECO Energy	Direct TECO Partners	Direct Emera, Inc.	Direct Nova Scotia Power	Direct Grand Bahama	Direct Emera Caribbean (incl Barbados)	Direct Emera Energy Services	Direct Emera Technologies	Direct US Sub 1	Direct Teco Finance
Legal Services	5,033,231	2,252,806	2,780,425	1,703,003	839,442	212,490	24,450	-	297	-	743	-	1,122,580	394,285	18,770	-	5,707	680,563	30,901	-	-	-	-	-	-	-	-
State/Comm Affairs	126,530	5,144	121,386	88,260	19,373	12,296	1,457	-	-	-	-	-	5,144	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Finance	10,943,255	3,570,488	7,372,767	4,934,780	1,522,817	773,134	68,133	47,122	19,154	-	7,628	-	2,919,998	289,026	106,669	-	6,560	5,273	10,934	116,316	83,727	3,821	5,968	15,636	-	-	6,560
Safety & Security	590,212	-	590,212	354,009	106,710	120,108	-	-	9,384	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Customer Experience	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	6,821,163	1,880,772	4,940,391	3,943,779	446,242	487,808	-	-	39,644	22,918	-	-	1,853,984	11,639	15,145	-	-	-	4	-	-	-	-	-	-	-	-
Procurement	6,125,420	14,337	6,111,083	4,788,865	1,192,253	86,094	-	-	43,872	-	-	-	14,029	308	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	47,604,769	15,090,259	32,797,501	21,216,703	6,444,709	4,634,287	-	-	501,802	-	-	-	12,158,793	2,736,865	194,602	-	-	-	-	-	-	-	-	-	-	-	-
Corporate	17,598,212	-	17,598,212	12,795,660	2,808,675	1,782,699	211,179	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	**94,842,792**	**22,813,806**	**72,311,977**	**49,825,060**	**13,380,221**	**8,108,916**	**305,218**	**47,122**	**614,153**	**22,918**	**8,371**	**-**	**18,074,528**	**3,432,123**	**335,186**	**-**	**12,267**	**685,836**	**41,839**	**116,316**	**83,727**	**3,821**	**5,968**	**15,636**	**-**	**-**	**6,560**
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Check Figure																											
Check Figure			-																								

	Direct + Allocable Total Cost	Direct Total Cost	Allocable Total Cost	Allocable TEC	Allocable PGS	Allocable NMGC	Allocable TECO Pipeline	Allocable Seacoast	Allocable TECO Partners	Allocable TECO Gemstone	Allocable TECO Energy	Allocable Emera Technologies	Direct Tampa Electric	Direct PGS	Direct NMGC	Direct TECO Pipeline	Direct Seacoast Gas Transmission	Direct TECO Energy	Direct TECO Partners	Direct Emera, Inc.	Direct Nova Scotia Power	Direct Grand Bahama	Direct Emera Caribbean (incl Barbados)	Direct Emera Energy Services	Direct Emera Technologies	Direct US Sub 1	Direct Teco Finance
Corporate Overhead Allocation	$ 28,232,514	$ 2,797,677	$ 25,434,837	$ 18,493,670	$ 4,059,400	$ 2,576,549	$ 305,218	$ -	$ -	$ -	$ -	$ -	$ 1,606,220	$ 231,788	$ 125,439	$ -	$ 8,679	$ 582,589	$ 10,934	$ 116,316	$ 83,727	$ 3,821	$ 5,968	$ 15,636	$ -	$ -	$ 6,560
IT Charges	$ 47,604,769	$ 15,090,259	$ 32,797,501	$ 21,216,703	$ 6,444,709	$ 4,634,287	$ -	$ -	$ 501,802	$ -	$ -	$ -	$ 12,158,793	$ 2,736,865	$ 194,602	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
HR Benefits Admin Charges	$ 3,335,759	$ 434,726	$ 2,901,033	$ 1,998,232	$ 403,824	$ 440,087	$ -	$ -	$ 35,973	$ 22,918	$ -	$ -	$ 407,981	$ 11,600	$ 15,145	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
HREmpRel Charges	$ 3,485,404	$ 1,446,046	$ 2,039,358	$ 1,945,548	$ 42,419	$ 47,721	$ -	$ -	$ 3,671	$ -	$ -	$ -	$ 1,446,003	$ 39	$ -	$ -	$ -	$ -	$ 4	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement Charges	$ 4,569,004	$ 13,789	$ 4,555,215	$ 3,617,296	$ 839,071	$ 86,094	$ -	$ -	$ 12,755	$ -	$ -	$ -	$ 13,789	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Admin Services Charges	$ 1,556,416	$ 548	$ 1,555,868	$ 1,171,569	$ 353,182	$ -	$ -	$ -	$ 31,117	$ -	$ -	$ -	$ 240	$ 308	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
EmerMgmt Charges	$ 590,212	$ -	$ 590,212	$ 354,009	$ 106,710	$ 120,108	$ -	$ -	$ 9,384	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
AcctsPay Charges	$ 3,162,184	$ 1,467,164	$ 1,695,020	$ 806,490	$ 616,648	$ 197,978	$ -	$ 47,122	$ 19,154	$ -	$ 7,628	$ -	$ 1,381,512	$ 83,576	$ -	$ -	$ -	$ 2,076	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Claims Charges	$ 2,306,530	$ 1,563,597	$ 742,933	$ 221,543	$ 514,258	$ 6,092	$ -	$ -	$ 297	$ -	$ 743	$ -	$ 1,059,990	$ 367,947	$ -	$ -	$ 3,588	$ 101,171	$ 30,901	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total	**94,842,792**	**22,813,806**	**72,311,977**	**49,825,060**	**13,380,221**	**8,108,916**	**305,218**	**47,122**	**614,153**	**22,918**	**8,371**	**-**	**18,074,528**	**3,432,123**	**335,186**	**-**	**12,267**	**685,836**	**41,839**	**116,316**	**83,727**	**3,821**	**5,968**	**15,636**	**-**	**-**	**6,560**
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

SharePoint subject to a request for confidential classification, motion for temporary protective order and/or a non-disclosure agreement.

Specific Responses

71. **Allocations from TECO to Affiliates.** Please provide copies of any documentation that supports the rationale, calculations, and conclusions for your responses to Interrogatory No. 95, including all reconciliations to the related FERC Form 1 affiliate transaction information for the applicable years.

Response: Tampa Electric's non-confidential electronic documents responsive to this request will be served by posting on the SharePoint in the folder entitled "POD_5_71."

72. **Allocation Factor by Type of Allocation Method.** For each of the calendar years 2019 to 2023 (and estimated/budgeted amounts for 2024, 2025 and adjusted amounts for this rate case proceeding), regarding the allocation factor for each allocation method from TECO to Emera and each affiliate, please provide copies of any documentation that support (including the reasons for the changes) in your response to Interrogatory No. 96.

Response Please see the company's response to OPC's 5th Request for Production of Documents, No. 71, above.

73. **2023 FERC Form 1.** The April 10, 2024, email from TECO (item 9) states that TECO includes details of affiliate transactions in its FERC Form 1 that is filed with the Commission, and he states the 2023 FERC Form 1 will be filed soon. However, TECO Witness Latta sponsors MFR Schedule C-30 which includes certain affiliate transaction information for calendar year 2023, including amounts allocated/charged to TECO for 2023. Please address the following regarding related Interrogatory No. 97:

a. When the 2023 FERC Form 1 is filed with the Commission, provide a copy of this document to OPC.

b. Provide affiliate transaction schedules in the 2023 FERC Form 1 as a working Excel file, along with all supporting workpapers and documents.

Response:

a. The company's non-confidential response consisting of the 2023 FERC Form 1 is included on the SharePoint in the folder entitled "POD_5_73." This file was filed with the Florida Public Service Commission on April 18, 2024, and provided to OPC via email on the same date on or about 1:20 PM.

b. The company's non-confidential response to this request is included on the SharePoint in the folder entitled "POD_5_73."

2023 Total

Per EPM

Organization	Department	Assessment Factor	Cost Center	Direct + Allocable Total Cost	Direct Total Cost	Allocable Total Cost	Allocable TEC	Allocable PGS	Allocable NMGC	Allocable TECO Pipeline	Allocable Seacoast	Allocable TECO Partners	Allocable TECO Gemstone	Allocable TECO Energy	Allocable Emera Technologies
Legal Services	VP General Counsel	MMM	A230060	$ 556,861	$ -	$ 556,861	$ 404,170	$ 85,979	$ 58,081	$ -	$ 8,631	$ -	$ -	$ -	$ -
Legal Services	Corporate Secretary	MMM	A230062	$ 131,680	$ 32,499	$ 99,181	$ 71,986	$ 15,314	$ 10,345	$ -	$ 1,537	$ -	$ -	$ -	$ -
Legal Services	Legal Services	MMM	A230092	$ 2,279,209	$ 1,647,257	$ 631,952	$ 458,671	$ 97,573	$ 65,913	$ -	$ 9,795	$ -	$ -	$ -	$ -
Legal Services	Claims	Claims	A230048	$ 807,787	$ -	$ 807,787	$ 140,716	$ 654,873	$ 11,147	$ -	$ -	$ 323	$ -	$ 727	$ -
Legal Services	Compliance	MMM	A230055	$ 607,466	$ 5,005	$ 602,461	$ 437,266	$ 93,020	$ 62,837	$ -	$ 9,338	$ -	$ -	$ -	$ -
State/Comm Affairs	Federal Affairs	MMM	A230054	$ 866,407	$ 739,004	$ 127,403	$ 92,469	$ 19,671	$ 13,288	$ -	$ 1,975	$ -	$ -	$ -	$ -
Legal Services	Real Estate	N/A		$ 1,607,816	$ 1,607,816	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Finance	Accounts Payable	Invoices	A261001	$ 1,556,472	$ 4,628	$ 1,551,844	$ 738,057	$ 573,872	$ 163,564	$ -	$ 52,452	$ 16,294	$ -	$ 7,604	$ -
Finance	Energy Risk	MMM	A230073	$ 166,679	$ 160,301	$ 6,378	$ 4,629	$ 985	$ 665	$ -	$ 99	$ -	$ -	$ -	$ -
Finance	Insurance Risk	MMM	A230085	$ 332,427	$ 169,814	$ 162,613	$ 118,024	$ 25,107	$ 16,960	$ -	$ 2,520	$ -	$ -	$ -	$ -
Finance	Treasury	MMM	A230087	$ 487,334	$ -	$ 487,334	$ 353,707	$ 75,244	$ 50,829	$ -	$ 7,554	$ -	$ -	$ -	$ -
Finance	Corporate Tax	MMM	A230086	$ 1,831,138	$ 1,490,302	$ 340,836	$ 247,379	$ 52,625	$ 35,549	$ -	$ 5,283	$ -	$ -	$ -	$ -
Finance	Corporate Accounting	MMM	A230088	$ 2,946,612	$ 350,746	$ 2,595,866	$ 1,884,080	$ 400,802	$ 270,749	$ -	$ 40,236	$ -	$ -	$ -	$ -
Finance	Audit Services	MMM	A230089	$ 1,666,038	$ 230,732	$ 1,435,306	$ 1,041,745	$ 221,611	$ 149,702	$ -	$ 22,247	$ -	$ -	$ -	$ -
Finance	Pension Investments	MMM		$ 427,718	$ 21	$ 427,697	$ 310,423	$ 66,036	$ 44,609	$ -	$ 6,629	$ -	$ -	$ -	$ -
Finance	Planning & Budgets	MMM	A234519	$ 736,633	$ (28)	$ 736,661	$ 534,669	$ 113,741	$ 76,834	$ -	$ 11,418	$ -	$ -	$ -	$ -
Procurement	Document Services	Headcount	A232039	$ 513,910	$ -	$ 513,910	$ 381,886	$ 121,591	$ -	$ -	$ -	$ 10,432	$ -	$ -	$ -
Human Resources	Payroll	Headcount	A233551	$ 868,830	$ 13,785	$ 855,045	$ 611,443	$ 115,431	$ 111,583	$ -	$ -	$ 10,004	$ 6,584	$ -	$ -
Corporate	Corporate Responsibility	MMM		$ 14,878,104	$ -	$ 14,878,104	$ 10,798,528	$ 2,297,179	$ 1,551,786	$ -	$ 230,611	$ -	$ -	$ -	$ -
Corporate	Other Corporate	MMM		$ 169,249	$ -	$ 169,249	$ 122,841	$ 26,132	$ 17,653	$ -	$ 2,623	$ -	$ -	$ -	$ -
Safety & Security	Corporate Security	N/A	A231003	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Safety & Security	Emergency Management	Headcount	A231004	$ 708,360	$ 275,700	$ 432,660	$ 259,942	$ 82,768	$ 82,854	$ -	$ -	$ 7,096	$ -	$ -	$ -
Human Resources	Healthcare	Headcount	A233552	$ 530,173	$ -	$ 530,173	$ 379,127	$ 71,573	$ 69,188	$ -	$ -	$ 6,203	$ 4,082	$ -	$ -
Human Resources	Retirement	Headcount	553	$ 256,409	$ 11,614	$ 244,795	$ 175,053	$ 33,047	$ 31,946	$ -	$ -	$ 2,864	$ 1,885	$ -	$ -
Human Resources	Benefits Admin	Headcount	A233554	$ 1,440,777	$ 81	$ 1,440,696	$ 1,030,242	$ 194,494	$ 188,011	$ -	$ -	$ 16,856	$ 11,093	$ -	$ -
Human Resources	Compensation	Headcount	A233556	$ 366,933	$ 9	$ 366,924	$ 262,387	$ 49,535	$ 47,884	$ -	$ -	$ 4,293	$ 2,825	$ -	$ -
Human Resources	HR Managers	Headcount	A233550	$ 1,106,911	$ 1,070,972	$ 35,939	$ 35,152	$ 377	$ 377	$ -	$ -	$ 32	$ -	$ -	$ -
Human Resources	Assessment & Development	Headcount	557	$ 1,316	$ 239	$ 1,077	$ 1,053	$ 11	$ 11	$ -	$ -	$ 1	$ -	$ -	$ -
Human Resources	Training & Development	Headcount	A233555	$ 602,913	$ 96,136	$ 506,777	$ 495,678	$ 5,321	$ 5,321	$ -	$ -	$ 456	$ -	$ -	$ -
Human Resources	Recruitment & Staffing	Headcount	A233558	$ 1,238,008	$ 427,649	$ 810,359	$ 792,612	$ 8,509	$ 8,509	$ -	$ -	$ 729	$ -	$ -	$ -
Human Resources	Employee Relations Admin	Headcount	559	$ 203,255	$ 20,066	$ 183,189	$ 179,178	$ 1,923	$ 1,923	$ -	$ -	$ 165	$ -	$ -	$ -
Human Resources	HRIS	Headcount		$ 398,356	$ -	$ 398,356	$ 284,864	$ 53,778	$ 51,985	$ -	$ -	$ 4,661	$ 3,067	$ -	$ -
Human Resources	Labor Relations	Headcount	A233560	$ 412,438	$ 5,933	$ 406,505	$ 397,602	$ 4,268	$ 4,268	$ -	$ -	$ 366	$ -	$ -	$ -
Procurement	Procurement Admin	PO Spend	A232030	$ 709,347	$ -	$ 709,347	$ 634,156	$ 68,665	$ 5,604	$ -	$ -	$ 922	$ -	$ -	$ -
Procurement	Purchase & Inventory Management	PO Spend	A232029	$ 1,313,626	$ -	$ 1,313,626	$ 1,174,382	$ 127,159	$ 10,378	$ -	$ -	$ 1,708	$ -	$ -	$ -
Procurement	Supplier Diversity	PO Spend	A232028	$ 506,881	$ -	$ 506,881	$ 453,151	$ 49,066	$ 4,004	$ -	$ -	$ 659	$ -	$ -	$ -
Procurement	Contracts Admin	PO Spend	A232034	$ 2,892,285	$ -	$ 2,892,285	$ 2,585,703	$ 279,973	$ 22,849	$ -	$ -	$ 3,760	$ -	$ -	$ -
Procurement	Record Retention	Headcount	A232032	$ 157,641	$ -	$ 157,641	$ 117,143	$ 37,298	$ -	$ -	$ -	$ 3,200	$ -	$ -	$ -
Procurement	Duplicating	Headcount	A232036	$ 278,860	$ -	$ 278,860	$ 207,221	$ 65,978	$ -	$ -	$ -	$ 5,661	$ -	$ -	$ -
Procurement	Mailroom	Headcount	A232038	$ 615,451	$ -	$ 615,451	$ 457,342	$ 145,616	$ -	$ -	$ -	$ 12,494	$ -	$ -	$ -
Information Technology	IT Allocable Costs (Telecom/Facilities Overhead)- Vacancy	Headcount	A231500	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	IT Allocable Costs (Telecom/Facilities Overhead)	Headcount	A231500	$ 3,409,261	$ -	$ 3,409,261	$ 2,201,019	$ 700,603	$ 456,159	$ -	$ -	$ 51,480	$ -	$ -	$ -
Information Technology	IT Admin	Headcount	A231505	$ 4,247,337	$ 1,163,635	$ 3,083,702	$ 1,990,838	$ 633,701	$ 412,599	$ -	$ -	$ 46,564	$ -	$ -	$ -
Information Technology	ED/ES Leadership	Headcount	A231538	$ 202,377	$ 202,377	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	ED/ES Delivery Control Systems	Headcount	A231539	$ 407,139	$ 407,139	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	ED/ES Work & Asset Management Systems	Headcount		$ 228,177	$ 228,177	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Project Mgmt - ED & ES	Headcount		$ 50,157	$ 50,157										
Information Technology	BRM & BSA - ED & ES	Headcount		$ 478,818	$ 478,818										
Information Technology	Data Mgt, Analytics & Reporting	Headcount	A231540	$ 887,446	$ 158,635	$ 728,811	$ 470,521	$ 149,771	$ 97,515	$ -	$ -	$ 11,005	$ -	$ -	$ -
Information Technology	Innovation, Automation & Emerging Tech	Headcount	A231501	$ 40,484	$ 27,391	$ 13,094	$ 8,453	$ 2,691	$ 1,752	$ -	$ -	$ 198	$ -	$ -	$ -
Information Technology	Project Mgmt - ADS	Headcount		$ 44,796	$ -	$ 44,796	$ 28,920	$ 9,206	$ 5,994	$ -	$ -	$ 676	$ -	$ -	$ -
Information Technology	Project Mgmt & BP Support	Headcount	A231517	$ 466,025	$ 3,706	$ 462,319	$ 298,473	$ 95,007	$ 61,858	$ -	$ -	$ 6,981	$ -	$ -	$ -
Information Technology	Data Center / Compute & Storage	Headcount	A231506	$ 1,274,640	$ 43,269	$ 1,231,371	$ 794,973	$ 253,047	$ 164,757	$ -	$ -	$ 18,594	$ -	$ -	$ -
Information Technology	Data Management	Headcount	A231511	$ 380,912	$ 28	$ 380,884	$ 245,899	$ 78,272	$ 50,962	$ -	$ -	$ 5,751	$ -	$ -	$ -
Information Technology	Network Engineering/Infrastructure	Headcount	A231527	$ 752,417	$ 420,450	$ 331,967	$ 214,318	$ 68,219	$ 44,417	$ -	$ -	$ 5,013	$ -	$ -	$ -
Information Technology	Cyber Security Operations	Headcount	A231529	$ 1,281,488	$ -	$ 1,281,488	$ 827,329	$ 263,346	$ 171,463	$ -	$ -	$ 19,350	$ -	$ -	$ -
Information Technology	Service Desk	Headcount		$ 969,042	$ -	$ 969,042	$ 625,614	$ 199,138	$ 129,658	$ -	$ -	$ 14,633	$ -	$ -	$ -
Information Technology	Desktop & Field Support:	Headcount		$ 891,399	$ 293,981	$ 597,418	$ 385,693	$ 122,769	$ 79,935	$ -	$ -	$ 9,021	$ -	$ -	$ -
Information Technology	Data Center / Network & Enterprise Hardening	Headcount	A231507	$ 2,064,291	$ 209	$ 2,064,082	$ 1,332,571	$ 424,169	$ 276,174	$ -	$ -	$ 31,168	$ -	$ -	$ -
Information Technology	Compliance Ops	Headcount		$ 238,480	$ 4,050	$ 234,430	$ 151,348	$ 48,175	$ 31,367	$ -	$ -	$ 3,540	$ -	$ -	$ -
Information Technology	Hosting & Cloud	Headcount	A231521	$ 688,744	$ 4,160	$ 684,584	$ 441,968	$ 140,682	$ 91,597	$ -	$ -	$ 10,337	$ -	$ -	$ -
Information Technology	Digital Collaboration	Headcount	A231514	$ 1,537,019	$ 1,537,019	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Service Mgmt	Headcount		$ 76,394	$ -	$ 76,394	$ 49,320	$ 15,699	$ 10,221	$ -	$ -	$ 1,154	$ -	$ -	$ -
Information Technology	Remote Access & Desktop Engineering	Headcount		$ 246,444	$ -	$ 246,444	$ 159,104	$ 50,644	$ 32,974	$ -	$ -	$ 3,721	$ -	$ -	$ -
Information Technology	Cyber Security Architecture	Headcount		$ 372,941	$ 80,167	$ 292,774	$ 189,015	$ 60,165	$ 39,173	$ -	$ -	$ 4,421	$ -	$ -	$ -
Information Technology	Business Relationship Managers	Headcount	A231504	$ 98,169	$ 88,984	$ 9,185	$ 5,930	$ 1,887	$ 1,229	$ -	$ -	$ 139	$ -	$ -	$ -
Information Technology	Enterprise Architecture & IT DR/BC	Headcount	A231509	$ 417,713	$ -	$ 417,713	$ 269,676	$ 85,840	$ 55,890	$ -	$ -	$ 6,307	$ -	$ -	$ -
Information Technology	Enterprise Information Security & Risk Mgmt	Headcount	A231515	$ 615,431	$ -	$ 615,431	$ 397,322	$ 126,471	$ 82,345	$ -	$ -	$ 9,293	$ -	$ -	$ -
Information Technology	Project Mgt Office - Project & Program Mgt	Headcount	A231513	$ 930,067	$ 269,026	$ 661,042	$ 426,769	$ 135,844	$ 88,447	$ -	$ -	$ 9,982	$ -	$ -	$ -
Information Technology	Project Mgt Office - BSA	Headcount	A231530	$ 412,039	$ 196,933	$ 215,106	$ 138,872	$ 44,204	$ 28,781	$ -	$ -	$ 3,248	$ -	$ -	$ -
Information Technology	Project Mgt Office - TaaS	Headcount		$ 135,662	$ 124,249	$ 11,413	$ 7,368	$ 2,345	$ 1,527	$ -	$ -	$ 172	$ -	$ -	$ -
Information Technology	IT Maintenance	Headcount	A231522	$ 12,039,094	$ 2,938,880	$ 9,100,214	$ 5,875,098	$ 1,870,094	$ 1,217,609	$ -	$ -	$ 137,413	$ -	$ -	$ -
Information Technology	Asset & Vendor Management	Headcount	A231525	$ 834,359	$ 52,101	$ 782,258	$ 505,026	$ 160,754	$ 104,666	$ -	$ -	$ 11,812	$ -	$ -	$ -
Information Technology	Quality Assurance & Compliance	Headcount	A231524	$ 765,276	$ 104,026	$ 661,250	$ 426,903	$ 135,887	$ 88,475	$ -	$ -	$ 9,985	$ -	$ -	$ -
Information Technology	NERC	Headcount	1516/F231520/F23152	$ 2,193,859	$ 2,193,859	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Project Mgmt - Compliance	Headcount		$ 325,395	$ -	$ 325,395	$ 210,075	$ 66,869	$ 43,538	$ -	$ -	$ 4,913	$ -	$ -	$ -
Information Technology	BRM & BSA - Compliance	Headcount		$ 42,473	$ -	$ 42,473	$ 27,420	$ 8,728	$ 5,683	$ -	$ -	$ 641	$ -	$ -	$ -
Information Technology	Performance Opt, Benchmarking, Communications & Admin	Headcount	A231523	$ 241,959	$ -	$ 241,959	$ 156,209	$ 49,723	$ 32,374	$ -	$ -	$ 3,654	$ -	$ -	$ -
Information Technology	PGS Operations	Headcount	A231510	$ 719,551	$ 721,096	$ (1,545)	$ (998)	$ (318)	$ (207)	$ -	$ -	$ (23)	$ -	$ -	$ -
Information Technology	PGS Work & Asset Mgmt	Headcount		$ 444,628	$ 435,544	$ 9,084	$ 5,865	$ 1,867	$ 1,215	$ -	$ -	$ 137	$ -	$ -	$ -
Information Technology	BIS - Customer Experience	Headcount		$ 2,750,575	$ 2,745,265	$ 5,310	$ 3,428	$ 1,091	$ 710	$ -	$ -	$ 80	$ -	$ -	$ -
Information Technology	IT Corporate Operations	Headcount	A231532	$ 916,705	$ -	$ 916,705	$ 591,824	$ 188,383	$ 122,655	$ -	$ -	$ 13,842	$ -	$ -	$ -
Information Technology	Identity Access & HR	Headcount	A231533	$ 795,911	$ 44	$ 795,867	$ 513,812	$ 163,551	$ 106,487	$ -	$ -	$ 12,018	$ -	$ -	$ -
Information Technology	Coporate Business Solutions	Headcount	A231528	$ 1,861,472	$ 114,667	$ 1,746,805	$ 1,127,737	$ 358,968	$ 233,723	$ -	$ -	$ 26,377	$ -	$ -	$ -
Information Technology	Corporate Technology Solutions	Headcount		$ 602,222	$ -	$ 602,222	$ 388,794	$ 123,757	$ 80,577	$ -	$ -	$ 9,094	$ -	$ -	$ -
Information Technology	Project Mgmt - IT & Corp	Headcount		$ 32,465	$ -	$ 32,465	$ 20,959	$ 6,672	$ 4,344	$ -	$ -	$ 490	$ -	$ -	$ -
Information Technology	BRM & BSA - IT & Corp	Headcount		$ 248,445	$ -	$ 248,445	$ 160,396	$ 51,055	$ 33,242	$ -	$ -	$ 3,752	$ -	$ -	$ -
Information Technology	Strategic Technology Initiatives & Governance	Headcount		$ 406,163	$ -	$ 406,163	$ 262,219	$ 83,466	$ 54,345	$ -	$ -	$ 6,133	$ -	$ -	$ -

Organization	Department	Direct Tampa Electric	Direct PGS	Direct NMGC	Direct TECO Pipeline	Direct Seacoast Gas Transmission	Direct TECO Energy	Direct TECO Partners	Direct Emera, Inc.	Direct Nova Scotia Power	Direct Grand Bahama	Direct Emera Caribbean (incl Barbados)	Direct Emera Energy Services	Direct Emera Technologies	Direct US Sub 1	Direct Teco Finance
Legal Services	VP General Counsel	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Legal Services	Corporate Secretary	$ 16,899	$ 8,700	$ 6,200	$ -	$ 700	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Legal Services	Legal Services	$ 1,124,471	$ 475,204	$ -	$ -	$ 4,870	$ 11,513	$ 31,199	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Legal Services	Claims	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Legal Services	Compliance	$ 5,005	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
State/Comm Affairs	Federal Affairs	$ -	$ -	$ -	$ -	$ -	$ 739,004	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Legal Services	Real Estate	$ 1,510,835	$ 92,492	$ -	$ -	$ -	$ 4,489	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Finance	Accounts Payable	$ 4,628	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Finance	Energy Risk	$ 123,332	$ 28,754	$ 8,215	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Finance	Insurance Risk	$ 93,046	$ 38,384	$ 38,384	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Finance	Treasury	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Finance	Corporate Tax	$ 1,166,285	$ 193,917	$ 103,126	$ -	$ 6,466	$ 3,430	$ 10,675	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 6,403
Finance	Corporate Accounting	$ 350,746	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Finance	Audit Services	$ 5,519	$ -	$ -	$ -	$ -	$ -	$ -	$ 146,318	$ 71,597	$ 807	$ 6,452	$ 39	$ -	$ -	$ -
Finance	Pension Investments	$ 21	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Finance	Planning & Budgets	$ -	$ (28)	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement	Document Services	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Payroll	$ 13,785	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Corporate	Corporate Responsibility	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Corporate	Other Corporate	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Safety & Security	Corporate Security	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Safety & Security	Emergency Management	$ 250,478	$ 10,077	$ 15,145	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Healthcare	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Retirement	$ 11,614	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Benefits Admin	$ 81	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Compensation	$ 9	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	HR Managers	$ 1,070,972	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Assessment & Development	$ 239	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Training & Development	$ 96,136	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Recruitment & Staffing	$ 427,649	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Employee Relations Admin	$ 20,066	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	HRIS	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Human Resources	Labor Relations	$ 5,933	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement	Procurement Admin	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement	Purchase & Inventory Management	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement	Supplier Diversity	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement	Contracts Admin	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement	Record Retention	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement	Duplicating	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement	Mailroom	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	IT Allocable Costs (Telecom/Facilities Overhead)- Vacancy	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	IT Allocable Costs (Telecom/Facilities Overhead)	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	IT Admin	$ 1,151,935	$ 11,700	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	ED/ES Leadership	$ 202,377	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	ED/ES Delivery Control Systems	$ 407,139	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	ED/ES Work & Asset Management Systems	$ 228,177	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Project Mgmt - ED & ES	$ 50,157	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	BRM & BSA - ED & ES	$ 478,818	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Data Mgt, Analytics & Reporting	$ 116,695	$ 41,940	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Innovation, Automation & Emerging Tech	$ 27,391	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Project Mgmt - ADS	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Project Mgmt & BP Support	$ 3,706	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Data Center / Compute & Storage	$ 990	$ 42,279	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Data Management	$ 28	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Network Engineering/Infrastructure	$ 420,450	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Cyber Security Operations	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Service Desk	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Desktop & Field Support:	$ 82,726	$ 211,255	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Data Center / Network & Enterprise Hardening	$ -	$ 209	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Compliance Ops	$ 4,050	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Hosting & Cloud	$ 4,160	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Digital Collaboration	$ 882,026	$ 654,993	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Service Mgmt	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Remote Access & Desktop Engineering	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Cyber Security Architecture	$ 70,011	$ 2,998	$ 7,158	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Business Relationship Managers	$ 88,984	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Enterprise Architecture & IT DR/BC	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Enterprise Information Security & Risk Mgmt	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Project Mgt Office - Project & Program Mgt	$ 212,780	$ 56,245	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Project Mgt Office - BSA	$ 196,933	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Project Mgt Office - TaaS	$ 112,859	$ 11,390	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	IT Maintenance	$ 2,370,859	$ 568,022	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Asset & Vendor Management	$ 52,101	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Quality Assurance & Compliance	$ 815	$ 50,151	$ 53,060	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	NERC	$ 2,193,859	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Project Mgmt - Compliance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	BRM & BSA - Compliance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Performance Opt, Benchmarking, Communications & Admin	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	PGS Operations	$ -	$ 721,096	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	PGS Work & Asset Mgmt	$ 30	$ 435,514	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	BIS - Customer Experience	$ 1,847,227	$ 898,037	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	IT Corporate Operations	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Identity Access & HR	$ 44	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Coporate Business Solutions	$ 114,667	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Corporate Technology Solutions	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Project Mgmt - IT & Corp	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	BRM & BSA - IT & Corp	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Information Technology	Strategic Technology Initiatives & Governance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -

	Direct + Allocable Total Cost	Direct Total Cost	Allocable Total Cost	Allocable TEC	Allocable PGS	Allocable NMGC	Allocable TECO Pipeline	Allocable Seacoast	Allocable TECO Partners	Allocable TECO Gemstone	Allocable TECO Energy	Allocable Emera Technologies
Legal Services	5,990,820	3,292,577	2,698,243	1,512,809	946,759	208,322	-	29,302	323	-	727	-
State/Comm Affairs	866,407	739,004	127,403	92,469	19,671	13,288	-	1,975	-	-	-	-
Finance	10,151,052	2,406,516	7,744,536	5,232,713	1,530,023	809,462	-	148,439	16,294	-	7,604	-
Safety & Security	708,360	275,700	432,660	259,942	82,768	82,854	-	-	7,096	-	-	-
Customer Experience	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	7,426,319	1,646,484	5,779,835	4,644,392	538,269	521,007	-	-	46,631	29,537	-	-
Procurement	6,988,001	-	6,988,001	6,010,984	895,346	42,835	-	-	38,836	-	-	-
Information Technology	49,065,859	15,088,041	33,977,817	21,936,079	6,982,441	4,546,232	-	-	513,065	-	-	-
Corporate	15,047,353	-	15,047,353	10,921,369	2,323,311	1,569,439	-	233,234	-	-	-	-
Total	**96,244,170**	**23,448,322**	**72,795,847**	**50,610,757**	**13,318,589**	**7,793,439**	**-**	**412,950**	**622,244**	**29,537**	**8,331**	**-**
Check Figure	-	-	-	-	-	-	-	-	-	-	-	-
Check Figure			-									

	Direct Tampa Electric	Direct PGS	Direct NMGC	Direct TECO Pipeline	Direct Seacoast Gas Transmission	Direct TECO Energy	Direct TECO Partners	Direct Emera, Inc.	Direct Nova Scotia Power	Direct Grand Bahama	Direct Emera Caribbean (incl Barbados)	Direct Emera Energy Services	Direct Emera Technologies	Direct US Sub 1	Direct Teco Finance
Legal Services	2,657,210	576,396	6,200	-	5,570	16,002	31,199	-	-	-	-	-	-	-	-
State/Comm Affairs	-	-	-	-	-	739,004	-	-	-	-	-	-	-	-	-
Finance	1,743,577	261,027	149,725	-	6,466	3,430	10,675	146,318	71,597	807	6,452	39	-	-	6,403
Safety & Security	250,478	10,077	15,145	-	-	-	-	-	-	-	-	-	-	-	-
Customer Experience	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Human Resources	1,646,484	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Procurement	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Information Technology	11,321,994	3,705,830	60,218	-	-	-	-	-	-	-	-	-	-	-	-
Corporate	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	**17,619,743**	**4,553,330**	**231,288**	**-**	**12,036**	**758,436**	**41,874**	**146,318**	**71,597**	**807**	**6,452**	**39**	**-**	**-**	**6,403**
Check Figure	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

	Direct + Allocable Total Cost	Direct Total Cost	Allocable Total Cost	Allocable TEC	Allocable PGS	Allocable NMGC	Allocable TECO Pipeline	Allocable Seacoast	Allocable TECO Partners	Allocable TECO Gemstone	Allocable TECO Energy	Allocable Emera Technologies
Corporate Overhead Allocation	$ 29,691,373	$ 6,433,469	$ 23,257,904	$ 16,880,587	$ 3,591,020	$ 2,425,799	$ -	$ 360,498	$ -	$ -	$ -	$ -
IT Charges	$ 49,065,859	$ 15,088,041	$ 33,977,817	$ 21,936,079	$ 6,982,441	$ 4,546,232	$ -	$ -	$ 513,065	$ -	$ -	$ -
HR Benefits Admin Charges	$ 3,861,478	$ 25,489	$ 3,835,989	$ 2,743,116	$ 517,859	$ 500,597	$ -	$ -	$ 44,881	$ 29,537	$ -	$ -
HREmpRel Charges	$ 3,564,841	$ 1,620,995	$ 1,943,846	$ 1,901,276	$ 20,410	$ 20,410	$ -	$ -	$ 1,749	$ -	$ -	$ -
Procurement Charges	$ 5,422,139	$ -	$ 5,422,139	$ 4,847,392	$ 524,863	$ 42,835	$ -	$ -	$ 7,049	$ -	$ -	$ -
Admin Services Charges	$ 1,565,862	$ -	$ 1,565,862	$ 1,163,592	$ 370,483	$ -	$ -	$ -	$ 31,787	$ -	$ -	$ -
EmerMgmt Charges	$ 708,360	$ 275,700	$ 432,660	$ 259,942	$ 82,768	$ 82,854	$ -	$ -	$ 7,096	$ -	$ -	$ -
AcctsPay Charges	$ 1,556,472	$ 4,628	$ 1,551,844	$ 738,057	$ 573,872	$ 163,564	$ -	$ 52,452	$ 16,294	$ -	$ 7,604	$ -
Claims Charges	$ 807,787	$ -	$ 807,787	$ 140,716	$ 654,873	$ 11,147	$ -	$ -	$ 323	$ -	$ 727	$ -
Document Services Charges	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Payroll Charges	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total	**96,244,170**	**23,448,322**	**72,795,847**	**50,610,757**	**13,318,589**	**7,793,439**	**-**	**412,950**	**622,244**	**29,537**	**8,331**	**-**
	-	-	-	-	-	-	-	-	-	-	-	-

	Direct Tampa Electric	Direct PGS	Direct NMGC	Direct TECO Pipeline	Direct Seacoast Gas Transmission	Direct TECO Energy	Direct TECO Partners	Direct Emera, Inc.	Direct Nova Scotia Power	Direct Grand Bahama	Direct Emera Caribbean (incl Barbados)	Direct Emera Energy Services	Direct Emera Technologies	Direct US Sub 1	Direct Teco Finance
Corporate Overhead Allocation	$ 4,396,159	$ 837,423	$ 155,925	$ -	$ 12,036	$ 758,436	$ 41,874	$ 146,318	$ 71,597	$ 807	$ 6,452	$ 39	$ -	$ -	$ 6,403
IT Charges	$ 11,321,994	$ 3,705,830	$ 60,218	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
HR Benefits Admin Charges	$ 25,489	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
HREmpRel Charges	$ 1,620,995	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Procurement Charges	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Admin Services Charges	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
EmerMgmt Charges	$ 250,478	$ 10,077	$ 15,145	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
AcctsPay Charges	$ 4,628	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Claims Charges	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Document Services Charges	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Payroll Charges	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Total	**17,619,743**	**4,553,330**	**231,288**	**-**	**12,036**	**758,436**	**41,874**	**146,318**	**71,597**	**807**	**6,452**	**39**	**-**	**-**	**6,403**
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Organization	Department	Assessment Factor	Cost Center	Allocable & Direct Total Cost	Allocable Total Cost	Direct Total Cost	Allocable Labor	Allocable Outside Services	Allocable Employee Expenses	Allocable Materials & Supplies	Allocable Other	Allocable Total
Legal Services	**VP General Counsel**	MMM	A230060	611,782	611,782	-	555,926	-	13,878	4,827	37,152	611,782
Legal Services	**Corporate Secretary**	MMM	A230062	282,877	173,060	109,817	123,407	31,295	10,702	-	7,655	173,060
Legal Services	**Legal Services**	MMM	A230092	2,220,138	656,541	1,563,597	393,629	168,099	63,413	3,456	27,945	656,541
Legal Services	**Claims**	Claims	A230048	742,933	742,933	-	573,985	83,038	5,927	-	79,984	742,933
Legal Services	**Compliance**	MMM	A230055	601,253	596,109	5,144	506,833	1,147	7,484	206	80,439	596,109
State/Comm Affairs	**Federal Affairs**	MMM	A230054	700,778	121,386	579,392	99,544	-	14,983	-	6,858	121,386
Legal Services	**Real Estate**	N/A	F234061	1,467,164	-	1,467,164						
Finance	**Accounts Payable**	Invoices	A261001	1,722,254	1,695,020	27,234	1,100,925	370,412	4,712	9,720	209,250	1,695,020
Finance	**Energy Risk**	MMM	A230073	198,239	31,716	166,523	-	10,483	934	2,212	18,087	31,716
Finance	**Insurance Risk**	MMM	A230085	301,985	143,503	158,482	76,522	-	6,214	689	60,077	143,503
Finance	**Treasury**	MMM	A230087	794,729	779,936	14,793	537,630	4,796	2,310	48	235,153	779,936
Finance	**Corporate Tax**	MMM	A230086	1,750,385	249,969	1,500,416	141,934	45,092	30,939	4,821	27,183	249,969
Finance	**Corporate Accounting**	MMM	A230088	2,707,710	2,697,302	10,408	2,234,701	168,271	45,014	10,231	239,085	2,697,302
Finance	**Audit Services**	MMM	A230089	1,180,821	955,353	225,468	715,139	94,035	32,846	641	112,693	955,353
Finance	**Pension Investments**	MMM	A230083	391,733	391,733	-	214,278	3,746	-	147	173,562	391,733
Finance	**Planning & Budgets**	MMM	A234519	428,784	428,236	548	401,380	-	358	76	26,422	428,236
Procurement	**Document Services**	Headcount	A232039	454,559	454,559	-	427,039	(6,920)	586	7,319	26,535	454,559
Human Resources	**Payroll**	Headcount	A233551	506,584	506,584	-	371,508	107,520	-	984	26,572	506,584
Corporate	**Corporate Responsibility**	MMM	A230098	17,533,673	17,533,673	-	8,116,026	50,258	-	-	9,367,389	17,533,673
Corporate	**Other Corporate**	MMM		64,539	64,539	-	4,570	8,338			51,630	64,539
Safety & Security	**Corporate Security**	N/A	A231003	-	-	-						
Safety & Security	**Emergency Management**	Headcount	A231004	850,532	590,212	260,320	411,444	67,560	5,776	7,838	97,593	590,212
Human Resources	**HR Admin**	Headcount		1,165	1,165	-	1,097	-	-	-	68	1,165
Human Resources	**Healthcare**	Headcount	A233552	506,076	506,076	-	514,189	(40,000)	-	-	31,888	506,076
Human Resources	**Retirement**	Headcount	A233553	261,357	259,533	1,824	243,183	-	-	1,269	15,081	259,533
Human Resources	**Benefits Admin**	Headcount	A233554	1,308,738	1,146,055	162,683	580,458	148,562	85,778	5,333	325,924	1,146,055
Human Resources	**Compensation**	Headcount	A233556	481,663	481,620	43	452,647	-	-	623	28,350	481,620
Human Resources	**HR Managers**	Headcount	A233550	1,122,591	3,616	1,118,975	-	10	2,171	579	857	3,616
Human Resources	**Assessment & Development**	Headcount	A233557	15,193	15,193	-	-	9,500	5,693	-	-	15,193
Human Resources	**Training & Development**	Headcount	A233555	570,882	499,452	71,430	457,040	153	12,051	881	29,329	499,452
Human Resources	**Recruitment**	Headcount	A233558	1,120,078	864,480	255,598	579,441	232,804	4,123	5,290	42,823	864,480
Human Resources	**Employee Relations Admin**	Headcount	A233559	194,223	184,324	9,899	-	260	592	-	183,472	184,324
Human Resources	**HRIS**	Headcount	A233580	-	-	-	-	-	-	-	-	-
Human Resources	**Labor Relations**	Headcount	A233560	486,081	472,292	13,789	440,160	3,220	340	1,089	27,484	472,292
Procurement	**Procurement Admin**	PO Spend	A232030	627,130	627,130	-	245,838	12,091	4,611	5,548	359,043	627,130
Procurement	**Purchase & Inventory Management**	PO Spend	A232029	1,103,582	1,103,582	-	1,021,351	143	10,197	6,480	65,410	1,103,582
Procurement	**Supplier Diversity**	PO Spend	A232028	703,997	703,997	-	659,320	-	3,213	109	41,355	703,997
Procurement	**Contracts Admin**	PO Spend	A232034	2,120,506	2,120,506	-	1,847,061	149,799	2,889	3,586	117,172	2,120,506
Procurement	**Record Retention**	Headcount	A232032	133,616	133,616	-	116,831	6,595	-	915	9,275	133,616
Procurement	**Duplicating**	Headcount	A232036	269,400	269,400	-	190,396	7,120	175	59,263	12,446	269,400
Procurement	**Mailroom**	Headcount	A232038	698,293	698,293	-	272,212	2,301	407	1,022	422,351	698,293
Information Technology	**IT Allocable Costs (Telecom/Facilities Overhead)- Vacancy**	Headcount	A231500	3,313,760	3,313,760	-	-	-	6,546	-	3,307,214	3,313,760
Information Technology	**IT Allocable Costs (Telecom/Facilities Overhead)**	Headcount	A231500	-	-	-						
Information Technology	**IT Admin**	Headcount	A231505	4,294,760	3,804,097	490,663	2,257,447	218,625	55,746	16,868	1,255,411	3,804,097
Information Technology	**ED/ES Leadership**	Headcount	A231538	501,723	1,700	500,023	-	-	1,700	-	-	1,700
Information Technology	**ED/ES Delivery Control Systems**	Headcount	A231539	820,492	-	820,492	-	-	-	-	-	-
Information Technology	**ED/ES Work & Asset Management Systems**	Headcount	A231540	284,500	1,509	282,991	1,421	-	-	-	88	1,509
Information Technology	**Project Mgmt - ED & ES**	Headcount	A231557	-	-	-						
Information Technology	**BRM & BSA - ED & ES**	Headcount	A231556	-	-	-						
Information Technology	**Data Mgt, Analytics & Reporting**	Headcount	A231518	551,218	550,051	1,167	340,820	105,692	39,522	23,313	40,705	550,051
Information Technology	**Innovation, Automation & Emerging Tech**	Headcount	A231519	167,538	167,164	374	157,403	-	-	-	9,761	167,164
Information Technology	**Project Mgmt - ADS**	Headcount	A231565	-	-	-	-	-	-	-	-	-
Information Technology	**Project Mgmt & BP Support**	Headcount	A231517	1,023,168	993,774	29,393	923,462	5	9,160	3,713	57,435	993,774
Information Technology	**Data Center / Compute & Storage**	Headcount	A231506	1,050,326	1,050,134	193	854,174	135,280	743	6,326	53,610	1,050,134
Information Technology	**Data Management**	Headcount	A231511	462,263	462,263	0	418,497	17,813	-	-	25,953	462,263
Information Technology	**Network Engineering/Infrastructure**	Headcount	A231527	738,854	363,028	375,826	333,871	2,962	4,923	583	20,689	363,028
Information Technology	**Cyber Security Operations**	Headcount	A231529	1,267,117	1,267,117	-	1,154,962	18,000	15,803	6,586	71,765	1,267,117
Information Technology	**Service Desk**	Headcount	A231508	916,106	915,406	700	711,243	158,216	-	1,755	44,191	915,406
Information Technology	**Desktop & Field Support:**	Headcount	A231507	552,479	479,496	72,982	368,196	83,400	363	431	27,107	479,496
Information Technology	**Data Center / Network & Enterprise Hardening**	Headcount	A231521	1,919,380	1,919,005	375	1,021,175	807,899	331	20,392	69,208	1,919,005
Information Technology	**Compliance Ops**	Headcount	A231514	551,482	551,278	204	365,746	161,342	-	738	23,452	551,278
Information Technology	**Hosting & Cloud**	Headcount	A232542	529,775	529,775	-	361,215	145,457	382	321	22,401	529,775
Information Technology	**Digital Collaboration**	Headcount	A231550	1,166,133	-	1,166,133	-	-	-	-	-	-
Information Technology	**Service Mgmt**	Headcount		-	-	-	-	-	-	-	-	-
Information Technology	**Remote Access & Desktop Engineering**	Headcount	A231551	-	-	-	-	-	-	-	-	-
Information Technology	**Cyber Security Architecture**	Headcount	A231552	34,996	-	34,996	-	-	-	-	-	-
Information Technology	**Business Relationship Managers**	Headcount	A231504	612,392	2,113	610,278	-	-	-	-	2,113	2,113
Information Technology	**Enterprise Architecture & IT DR/BC**	Headcount	A231509	499,993	499,993	-	315,147	-	-	-	184,846	499,993
Information Technology	**Enterprise Information Security & Risk Mgmt**	Headcount	A231515	248,862	248,862	-	209,601	-	-	-	39,261	248,862
Information Technology	**Project Mgt Office - Project & Program Mgt**	Headcount	A231513	1,950,755	1,271,111	679,644	683,660	-	-	-	587,450	1,271,111
Information Technology	**Project Mgt Office - BSA**	Headcount	A231530	1,228,556	813,777	414,780	487,394	-	-	-	326,383	813,777
Information Technology	**Project Mgt Office - TaaS**	Headcount	A231543	309,062	36,169	272,892	29,915	-	-	-	6,255	36,169
Information Technology	**IT Maintenance**	Headcount	A231522	10,627,630	7,206,354	3,421,276	-	-	-	-	7,206,354	7,206,354
Information Technology	**Asset & Vendor Management**	Headcount	A231525	742,474	712,382	30,092	668,104	-	-	-	44,278	712,382
Information Technology	**Quality Assurance & Compliance**	Headcount	A231524	926,518	548,474	378,045	502,673	-	-	-	45,801	548,474
Information Technology	**NERC**	Headcount	F231516/F231520/F231526	2,140,269	-	2,140,269	-	-	-	-	-	-
Information Technology	**Project Mgmt - Compliance**	Headcount	A231563	-	-	-	-	-	-	-	-	-
Information Technology	**BRM & BSA - Compliance**	Headcount	A231562	-	-	-	-	-	-	-	-	-
Information Technology	**Performance Opt, Benchmarking, Communications & Admin**	Headcount	A231523	255,333	244,554	10,779	229,786	-	-	-	14,768	244,554
Information Technology	**PGS Operations**	Headcount	A231510	497,121	23,390	473,731	9,939	-	-	-	13,451	23,390
Information Technology	**PGS Work & Asset Mgmt**	Headcount	A231501	90,403	11,467	78,936	2,827	-	-	-	8,640	11,467
Information Technology	**BIS - Customer Experience**	Headcount	A231512	2,605,027	2,988	2,602,039	-	-	-	-	2,988	2,988
Information Technology	**IT Corporate Operations**	Headcount	A231532	878,710	878,710	-	650,502	-	-	-	228,208	878,710
Information Technology	**Identity Access & HR**	Headcount	A231533	918,428	916,951	1,478	727,265	-	-	-	189,686	916,951
Information Technology	**Coporate Business Solutions**	Headcount	A231528	2,319,098	2,119,593	199,505	712,778	-	-	-	1,406,815	2,119,593
Information Technology	**Corporate Technology Solutions**	Headcount	A231534	734,840	734,840	-	546,502	-	-	-	188,338	734,840
Information Technology	**Project Mgmt - IT & Corp**	Headcount	A231555	-	-	-	-	-	-	-	-	-
Information Technology	**BRM & BSA - IT & Corp**	Headcount	A231554	-	-	-	-	-	-	-	-	-
Information Technology	**Strategic Technology Initiatives & Governance**	Headcount	A231541	156,217	156,217	-	115,633	-	-	-	40,584	156,217
Legal Services				5,926,147	2,780,425	3,145,722	2,153,779	283,578	101,403	8,489	233,175	2,780,425
State/Comm Affairs				700,778	121,386	579,392	99,544	-	14,983	-	6,858	121,386
Finance				9,476,639	7,372,767	2,103,872	5,422,510	696,834	123,326	28,585	1,101,512	7,372,767
Safety & Security				850,532	590,212	260,320	411,444	67,560	5,776	7,838	97,593	590,212
Customer Experience				-	-	-	-	-	-	-	-	-
Human Resources				6,574,632	4,940,391	1,634,241	3,639,722	462,028	110,747	16,048	711,847	4,940,391
Procurement				6,111,083	6,111,083	-	4,780,047	171,129	22,078	84,243	1,053,586	6,111,083
Information Technology				47,887,760	32,797,501	15,090,259	15,161,358	1,854,690	135,218	81,026	15,565,209	32,797,501
Corporate				17,598,212	17,598,212	-	8,120,597	58,596	-	-	9,419,019	17,598,212
Total				**95,125,783**	**72,311,977**	**22,813,806**	**39,789,000**	**3,594,415**	**513,533**	**226,229**	**28,188,800**	**72,311,977**
check				-	-	-	-	-	-	-	-	-
check												#REF!
Corporate Overhead Allocation				31,236,589	25,434,837	5,801,752	14,121,520	585,558	229,074	27,354	10,471,331	25,434,837
IT Charges				47,887,760	32,797,501	15,090,259	15,161,358	1,854,690	135,218	81,026	15,565,209	32,797,501
HR Benefits Admin Charges				3,065,583	2,901,033	164,550	2,163,082	216,082	85,778	8,209	427,883	2,901,033
HREmpRel Charges				3,509,049	2,039,358	1,469,691	1,476,640	245,946	24,970	7,839	283,964	2,039,358
Procurement Charges				4,555,215	4,555,215	-	3,773,570	162,033	20,910	15,723	582,979	4,555,215
Admin Services Charges				1,555,868	1,555,868	-	1,006,477	9,096	1,168	68,520	470,607	1,555,868
EmerMgmt Charges				850,532	590,212	260,320	411,444	67,560	5,776	7,838	97,593	590,212
AcctsPay Charges				1,722,254	1,695,020	27,234	1,100,925	370,412	4,712	9,720	209,250	1,695,020
Claims Charges				742,933	742,933	-	573,985	83,038	5,927	-	79,984	742,933
Total				**95,125,783**	**72,311,977**	**22,813,806**	**39,789,000**	**3,594,415**	**513,533**	**226,229**	**28,188,800**	**72,311,977**
				-	-	-	-	-	-	-	-	-

Nova Scotia Power				Grand Bahama						Emera Caribbean (incl Barbados)						Emera Energy Services						Emera Technologies						US Sub 1						Teco Finance						TOTAL ALL DIRECT					
Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	98,386	-	11,431	-	-	$ 109,817
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	1,559,332	3,430	-	134	701	$ 1,563,597
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	5,144	-	-	$ 5,144
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	178,462	7,509	315,485	-	77,936	$ 579,392
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	413,402	10,169	12,185	7,717	1,023,691	$ 1,467,164
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	27,234	-	-	-	-	$ 27,234
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	92,935	68	73,520	-	-	$ 166,523
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	158,482	-	-	-	-	$ 158,482
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	14,793	-	-	-	-	$ 14,793
			$ -						$ -						$ -						$ -						$ -						$ -	6,560					$ 6,560	1,151,415	9,135	342,384	(2,018)	(500)	$ 1,500,416
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	9,274	84	-	-	1,050	$ 10,408
			$ 83,727	3,821					$ 3,821	5,968					$ 5,968	15,636					$ 15,636						$ -						$ -						$ -	225,468	-	-	-	-	$ 225,468
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	308	-	-	-	240	$ 548
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
																																								-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	124,676	8,415	118,353	2,472	6,404	$ 260,320
																																								-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	1,406	-	418	$ 1,824
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	150,000	-	12,683	$ 162,683
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	43	-	-	-	-	$ 43
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	1,102,249	-	16,351	-	375	$ 1,118,975
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	71,430	-	-	$ 71,430
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	140,641	6,611	106,684	219	1,443	$ 255,598
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	(3,659)	13,493	65	-	$ 9,899
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	11,511	-	2,278	$ 13,789
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	302,649	372	140,000	12,316	35,326	$ 490,663
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	495,821	3,511	65	611	16	$ 500,023
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	693,835	19,072	92,391	12,547	2,647	$ 820,492
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	280,501	2,168	-	321	-	$ 282,991
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	1,167	-	-	-	$ 1,167
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	374	-	$ 374
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	2,019	-	27,128	246	$ 29,393
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	193	-	-	-	$ 193
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	0	-	-	$ 0
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	373,534	608	-	1,298	386	$ 375,826
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	700	-	-	$ 700
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	71,740	1,243	-	-	-	$ 72,982
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	375	-	-	-	$ 375
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	128	-	76	-	$ 204
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	815,517	4,918	269,113	12,859	63,727	$ 1,166,133
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	34,996	-	-	-	-	$ 34,996
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	580,182	1,598	28,056	443	-	$ 610,278
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	47,146	367	632,132	-	-	$ 679,644
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	414,093	687	-	$ 414,780
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	269,785	2,241	866	$ 272,892
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	181	-	3,381,632	37,947	1,515	$ 3,421,276
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	28,753	-	1,340	$ 30,092
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	161,925	585	215,535	-	-	$ 378,045
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	1,542,143	-	598,126	-	-	$ 2,140,269
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	10,779	-	-	$ 10,779
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	460,007	-	13,724	-	-	$ 473,731
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	69,777	-	-	-	9,159	$ 78,936
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	1,753,872	7,687	834,323	5,936	220	$ 2,602,039
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	1,478	-	$ 1,478
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	92,290	-	107,147	68	-	$ 199,505
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
			$ -						$ -						$ -						$ -						$ -						$ -						$ -	-	-	-	-	-	$ -
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,071,120	13,599	28,760	7,851	1,024,392	3,145,722
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	178,462	7,509	315,485	-	77,936	579,392
-	-	-	83,727	3,821	-	-	-	-	3,821	5,968	-	-	-	-	5,968	15,636	-	-	-	-	15,636	-	-	-	-	-	-	-	-	-	-	-	-	6,560	-	-	-	-	6,560	1,679,909	9,287	415,904	(2,018)	790	2,103,872
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	124,676	8,415	118,353	2,472	6,404	260,320
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,242,933	2,952	370,875	284	17,197	1,634,241
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7,776,116	46,010	7,036,354	116,330	115,449	15,090,259
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	**-**	**-**	**83,727**	**3,821**	**-**	**-**	**-**	**-**	**3,821**	**5,968**	**-**	**-**	**-**	**-**	**5,968**	**15,636**	**-**	**-**	**-**	**-**	**15,636**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**6,560**	**-**	**-**	**-**	**-**	**6,560**	**13,073,216**	**87,772**	**8,285,731**	**124,919**	**1,242,168**	**22,813,806**
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
																																													#REF!
-	-	-	83,727	3,821	-	-	-	-	3,821	5,968	-	-	-	-	5,968	15,636	-	-	-	-	15,636	-	-	-	-	-	-	-	-	-	-	-	-	6,560	-	-	-	-	6,560	3,902,257	30,395	760,149	5,833	1,103,118	5,801,752
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7,776,116	46,010	7,036,354	116,330	115,449	15,090,259
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	43	-	151,406	-	13,101	164,550
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,242,890	2,952	219,469	284	4,096	1,469,691
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	124,676	8,415	118,353	2,472	6,404	260,320
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	27,234	-	-	-	-	27,234
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
-	**-**	**-**	**83,727**	**3,821**	**-**	**-**	**-**	**-**	**3,821**	**5,968**	**-**	**-**	**-**	**-**	**5,968**	**15,636**	**-**	**-**	**-**	**-**	**15,636**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**6,560**	**-**	**-**	**-**	**-**	**6,560**	**13,073,216**	**87,772**	**8,285,731**	**124,919**	**1,242,168**	**22,813,806**
-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

TECO TAMPA ELECTRIC AN EMERA COMPANY

Organization	Department	Assessment Factor	Cost Center	Allocable & Direct Total Cost	Allocable Total Cost	Direct Total Cost	Allocable Labor	Allocable Outside Services	Allocable Employee Expenses	Allocable Materials & Supplies	Allocable Other	Allocable Total
Legal Services	VP General Counsel	MMM	A230060	556,861	556,861	-	488,449	3,845	28,947	2,201	33,420	556,861
Legal Services	Corporate Secretary	MMM	A230062	131,680	99,181	32,499	40,764	40,000	14,444	508	3,465	99,181
Legal Services	Legal Services	MMM	A230092	2,279,209	631,952	1,647,257	383,451	120,456	93,457	6,906	27,682	631,952
Legal Services	Claims	Claims	A230048	807,787	807,787	-	589,909	127,451	9,246	75	81,106	807,787
Legal Services	Compliance	MMM	A230055	607,466	602,461	5,005	423,282	76,656	19,738	3,672	79,113	602,461
State/Comm Affairs	Federal Affairs	MMM	A230054	866,407	127,403	739,004	102,139	346	18,410	43	6,465	127,403
Legal Services	Real Estate	N/A	F234061	1,607,816	-	1,607,816						
Finance	Accounts Payable	Invoices	A261001	1,556,472	1,551,844	4,628	1,264,343	51,523	6,775	8,494	220,709	1,551,844
Finance	Energy Risk	MMM	A230073	166,679	6,378	160,301	-	6,400	-	293	(315)	6,378
Finance	Insurance Risk	MMM	A230085	332,427	162,613	169,814	84,882	-	1,714	146	75,870	162,613
Finance	Treasury	MMM	A230087	487,334	487,334	-	392,770	2,665	826	567	90,506	487,334
Finance	Corporate Tax	MMM	A230086	1,831,138	340,836	1,490,302	225,226	55,321	40,769	5,985	13,535	340,836
Finance	Corporate Accounting	MMM	A230088	2,946,612	2,595,866	350,746	2,062,344	269,595	70,843	7,019	186,067	2,595,866
Finance	Audit Services	MMM	A230089	1,666,038	1,435,306	230,732	894,695	97,530	46,556	6,509	390,017	1,435,306
Finance	Pension Investments	MMM	A230083	427,718	427,697	21	221,351	3,677	15,803	16	186,850	427,697
Finance	Planning & Budgets	MMM	A234519	736,633	736,661	(28)	690,603	50	-	2,955	43,053	736,661
Procurement	Document Services	Headcount	A232039	513,910	513,910	-	475,799	4,067	1,021	3,516	29,507	513,910
Human Resources	Payroll	Headcount	A233551	868,830	855,045	13,785	450,651	358,050	20,471	1,429	24,444	855,045
Corporate	Corporate Responsibility	MMM	A230098	14,878,104	14,878,104	-	5,253,208	44,503	5,198	-	9,575,195	14,878,104
Corporate	Other Corporate			169,249	169,249	-	87,875	9,473		540	71,361	169,249
Safety & Security	Corporate Security	N/A	A231003	-	-	-						
Safety & Security	Emergency Management	Headcount	A231004	708,360	432,660	275,700	301,530	69,236	-	-	61,893	432,660
Human Resources	Healthcare	Headcount	A233552	530,173	530,173	-	480,239	20,123	-	-	29,811	530,173
Human Resources	Retirement	Headcount	A233553	256,409	244,795	11,614	227,811	-	-	2,856	14,128	244,795
Human Resources	Benefits Admin	Headcount	A233554	1,440,777	1,440,696	81	808,282	246,014	33,343	3,395	349,663	1,440,696
Human Resources	Compensation	Headcount	A233556	366,933	366,924	9	225,113	129,227	-	256	12,328	366,924
Human Resources	HR Managers	Headcount	A233550	1,106,911	35,939	1,070,972	-	31,993	3,298	-	647	35,939
Human Resources	Assessment & Development	Headcount	A233557	1,316	1,077	239	-	33	932	112	-	1,077
Human Resources	Training & Development	Headcount	A233555	602,913	506,777	96,136	469,312	-	6,635	1,127	29,702	506,777
Human Resources	Recruitment	Headcount	A233558	1,238,008	810,359	427,649	733,773	19,157	495	6,036	50,899	810,359
Human Resources	Employee Relations Admin	Headcount	A233559	203,255	183,189	20,066	-	-	-	221	182,968	183,189
Human Resources	HRIS	Headcount	A233580	398,356	398,356	-	248,385	137,707	4,582	49	7,632	398,356
Human Resources	Labor Relations	Headcount	A233560	412,438	406,505	5,933	418,251	130	353	193	(12,423)	406,505
Procurement	Procurement Admin	PO Spend	A232030	709,347	709,347	-	302,921	35,082	5,848	1,006	364,489	709,347
Procurement	Inventory Management	PO Spend	A232029	1,313,626	1,313,626	-	1,137,449	81,618	15,920	6,340	72,300	1,313,626
Procurement	Supplier Diversity	PO Spend	A232028	506,881	506,881	-	381,892	86,244	11,195	315	27,235	506,881
Procurement	Contracts Admin	PO Spend	A232034	2,892,285	2,892,285	-	2,563,627	152,277	1,613	13,890	160,878	2,892,285
Procurement	Record Retention	Headcount	A232032	157,641	157,641	-	138,946	6,905	458	504	10,827	157,641
Procurement	Duplicating	Headcount	A232036	278,860	278,860	-	259,155	(25,834)	566	28,418	16,554	278,860
Procurement	Mailroom	Headcount	A232038	615,451	615,451	-	181,460	8,205	548	7,611	417,628	615,451
Information Technology	IT Allocable Costs (Telecom)		A231500	-	-	-						

Tampa Electric						Peoples Gas						New Mexico Gas Company						TECO Pipeline						Seacoast Gas Transmission						TECO Energy						TECO Partners						Emera Inc						Nova Scotia Power						Grand Bahama						Emera Caribbean (incl Barbados)						Emera Energy Services						Emera Technologies						US Sub 1						Teco Finance						TOTAL ALL DIRECT					
Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total	Direct Labor	Direct EE	Direct OS	Direct M&S	Direct Other	Direct Total

2021 O&M Budget

Procurement Spend Analysis June 1, 2019 thru May 31, 2020

$Million

	TEC	TEC - Inventory	PGS	TPI	TSI	NMG	Total
Direct Charge	$ 108.2						
Allocable Spend	$ 895.6	$ 108.2	$ 263.1	$ 7.0	$ -	$ 62.5	$ 1,336.4
Total Spend	$ 1,003.8						
Total Allocable Spend	$ 895.6	$ 108.2	$ 263.1	$ 7.0	$ -	$ 62.5	$ 1,336.4
Pecentage of PO Spend	67.02%	8.10%	19.69%	0.52%	0.00%	4.68%	100.0%
Procurement Assessment Based on Resource Support	**74.74%**	**5.63%**	**17.89%**	**0.32%**	**0.00%**	**1.42%**	**100.0%**

** Note - assessment methodology changed in 2017 to better represent resources

Standard Labor Distribution - Headcount Analysis
Human Resources Dept

As of **6/1/2022**

Headcounts with NMGC & PGS/TPI	Active Employees	1	Active Employees	
Company		Calc %	Rounded %	Grey cells
TSI	**0**	0.00%	0.0%	
NMGC	669	17.35%	17.4%	
Tampa Electric	**2,435**	63.16%	63.2%	
PGS	693	17.98%	18.0%	
TECO Partners	58	1.50%	1.5%	
Transport Related (Gemstone)	0	0.00%	0.0%	
	3,855	100.00%	100.0%	

Headcounts w/o NMGC & PGS/TPI	Active Employees	2	Active Employees	
Company		Calc %	Rounded %	Red cells
TSI	0	0.00%	0.0%	
NMGC	0	0.00%	0.0%	
Tampa Electric	2,435	100.00%	100.0%	
PGS	0	0.00%	0.0%	
TECO Partners	0	0.00%	0.0%	
Transport Related (Gemstone)	0	0.00%	0.0%	
	2,435	100.00%	100.0%	

Headcounts with partial NMGC & PGS/TPI (25%)	Active Employees	3	Active Employees	
Company		Calc %	Rounded %	Boxes with very little
TSI	0	0.00%	0.0%	
NMGC	167	5.99%	6.0%	
Tampa Electric	2,435	87.28%	87.3%	
PGS	173	6.21%	6.2%	
TECO Partners	15	0.52%	0.5%	
Transport Related (Gemstone)	0	0.00%	0.0%	
	2,790	100.00%	100.0%	

	4	Active/Ret Medical	Med Coverage	Med Coverage	Med Coverage
Company	Calc %	Rounded %	Active	Retiree	Total
TSI	0.00%	0.00%		-	0
NMGC	11.00%	11.00%	**566**	**62**	628
Tampa Electric	70.79%	70.78%	**2232**	**1,811**	4043
PGS	13.69%	13.69%	**628**	**154**	782
TECO Partners	1.23%	1.23%	**55**	**15**	70
Transport Related (Gemstone)	3.29%	3.29%		**188**	188
	100.00%	100.0%	3481	2,230	5711

	5	Retirement Group		
Company	Calc %	Rounded %	From table 1	Factor
TSI	0.00%	0.00%	0.00%	98.0%
NMGC	17.01%	17.01%	17.35%	98.0%
Tampa Electric	61.90%	61.89%	63.16%	98.0%
PGS	17.62%	17.62%	17.98%	98.0%
TECO Partners	1.47%	1.47%	1.50%	98.0%
Transport Related (Gemstone)	**2.00%**	2.00%	**2.00%**	100.0%
	100.00%	99.99%		

Approximately one week per year has been allocated to servicing TECO Gemstone retirees (former Transport and Coal employees) and associated activities (audit, actuarial calcs, etc.) This is based on historical work load and the projected population size for 2018.
The remaining 98% in this category #5 has been spread based on active employee count (Cat #1).

Lookup Table		TSI	NM	TEC	PGS	Part	Gem	
	1	0.00%	17.35%	63.2%	17.98%	1.50%	0.00%	100.00%
	2	0.00%	0.00%	100.0%	0.00%	0.00%	0.00%	100.00%
	3	0.00%	5.99%	87.3%	6.21%	0.52%	0.00%	99.99%
	4	0.00%	11.00%	70.8%	13.69%	1.23%	3.29%	99.99%
	5	0.00%	17.01%	61.9%	17.62%	1.47%	2.00%	99.99%

2021 O&M Budget

Procurement Spend Analysis June 1, 2019 thru May 31, 2020

$Million

	TEC	TEC - Inventory	PGS	TPI	TSI	NMG	Total
Direct Charge	$ 108.2						
Allocable Spend	$ 895.6	$ 108.2	$ 263.1	$ 7.0	$ -	$ 62.5	$ 1,336.4
Total Spend	$ 1,003.8						
Total Allocable Spend	$ 895.6	$ 108.2	$ 263.1	$ 7.0	$ -	$ 62.5	$ 1,336.4
Pecentage of PO Spend	67.02%	8.10%	19.69%	0.52%	0.00%	4.68%	100.0%

Procurement Assessment Based on Resource Support	**74.74%**	**5.63%**	**17.89%**	**0.32%**	**0.00%**	**1.42%**	**100.0%**

** Note - assessment methodology changed in 2017 to better represent resources

Standard Labor Distribution - Headcount Analysis
Human Resources Dept

As of **6/1/2022**

Headcounts with NMGC & PGS/TPI	Active Employees	**1**	Active Employees	
Company		Calc %	Rounded %	Grey cells
TSI	**0**	0.00%	0.0%	
NMGC	669	17.35%	17.4%	
Tampa Electric	**2,435**	63.16%	63.2%	
PGS	693	17.98%	18.0%	
TECO Partners	58	1.50%	1.5%	
Transport Related (Gemstone)	0	0.00%	0.0%	
	3,855	100.00%	100.0%	

Headcounts w/o NMGC & PGS/TPI	Active Employees	**2**	Active Employees	Red cells
Company		Calc %	Rounded %	
TSI	0	0.00%	0.0%	
NMGC	0	0.00%	0.0%	
Tampa Electric	2,435	100.00%	100.0%	
PGS	0	0.00%	0.0%	
TECO Partners	0	0.00%	0.0%	
Transport Related (Gemstone)	0	0.00%	0.0%	
	2,435	100.00%	100.0%	

Headcounts with partial NMGC & PGS/TPI (25%)	Active Employees	**3**	Active Employees	Boxes with very little
Company		Calc %	Rounded %	
TSI	0	0.00%	0.0%	
NMGC	167	5.99%	6.0%	
Tampa Electric	2,435	87.28%	87.3%	
PGS	173	6.21%	6.2%	
TECO Partners	15	0.52%	0.5%	
Transport Related (Gemstone)	0	0.00%	0.0%	
	2,790	100.00%	100.0%	

	4	Active/Ret Medical	Med Coverage	Med Coverage	Med Coverage
Company	Calc %	Rounded %	Active	Retiree	Total
TSI	0.00%	0.00%		-	0
NMGC	11.00%	11.00%	**566**	**62**	628
Tampa Electric	70.79%	70.78%	**2232**	**1,811**	4043
PGS	13.69%	13.69%	**628**	**154**	782
TECO Partners	1.23%	1.23%	**55**	**15**	70
Transport Related (Gemstone)	3.29%	3.29%		**188**	188
	100.00%	100.0%	3481	2,230	5711

	5	Retirement Group		
Company	Calc %	Rounded %	From table 1	Factor
TSI	0.00%	0.00%	0.00%	98.0%
NMGC	17.01%	17.01%	17.35%	98.0%
Tampa Electric	61.90%	61.89%	63.16%	98.0%
PGS	17.62%	17.62%	17.98%	98.0%
TECO Partners	1.47%	1.47%	1.50%	98.0%
Transport Related (Gemstone)	**2.00%**	2.00%	**2.00%**	100.0%
	100.00%	99.99%		

Approximately one week per year has been allocated to servicing TECO Gemstone retirees (former Transport and Coal employees) and associated activities (audit, actuarial calcs, etc.) This is based on historical work load and the projected population size for 2018. The remaining 98% in this category #5 has been spread based on active employee count (Cat #1).

Lookup Table

	TSI	**NM**	**TEC**	**PGS**	**Part**	**Gem**	
1	0.00%	17.35%	63.2%	17.98%	1.50%	0.00%	100.00%
2	0.00%	0.00%	100.0%	0.00%	0.00%	0.00%	100.00%
3	0.00%	5.99%	87.3%	6.21%	0.52%	0.00%	99.99%
4	0.00%	11.00%	70.8%	13.69%	1.23%	3.29%	99.99%
5	0.00%	17.01%	61.9%	17.62%	1.47%	2.00%	99.99%

	2020 Gross Allocable Total Cost	2021 Gross Allocable Total Cost	2022 Gross Allocable Total Cost	2023 Gross Allocable Total Cost	2024 Budget Gross Allocable Total Cost	2025 Budget Gross Allocable Total Cost
HR Benefits Admin Charges	3,002,936	2,718,855	2,901,033	3,835,989	2,930,042	3,057,421
HREmpRel Charges	3,205,167	2,101,932	2,039,358	1,943,846	2,753,850	2,976,534
Procurement Charges	4,093,444	4,453,017	4,555,215	5,422,139	6,118,377	6,332,412
Admin Services Charges	1,578,437	1,580,574	1,555,868	1,565,862	477,930	497,461
EmerMgmt Charges	533,976	555,433	590,212	432,660	182,069	-
Corp Comm Charges	2,360,305	2,276,410	-	-	-	-
IT Charges	27,638,036	29,661,415	32,797,501	33,977,817	35,643,663	36,973,678
AcctsPay Charges	1,091,352	1,346,513	1,695,020	1,551,844	1,640,211	1,700,360
Claims Charges	798,636	789,953	742,933	807,787	837,159	869,697
Payroll Charges	-	-	-	-	1,288,386	1,248,597
Document Services Charges	-	-	-	-	601,314	623,446
Corporate Overhead Allocation	24,360,124	22,713,891	25,434,837	23,257,904	19,147,654	19,816,401
Total	68,662,412	68,197,993	72,311,977	72,795,847	71,620,655	74,096,006

Shared Services

Assessments

HR Benefits Admin

Company	2020 Percentage	2021 Percentage	2022 Percentage	2023 Percentage	Budget 2024 Percentage	Budget 2025 Percentage	Comments
Tampa Electric	66.61%	66.51%	68.88%	71.51%	71.97%	71.97%	
Peoples Gas	15.94%	17.68%	13.92%	13.50%	13.45%	13.45%	
TECO Partners	1.39%	1.63%	1.24%	1.17%	1.14%	1.14%	
Gemstone	1.14%	1.15%	0.79%	0.77%	0.87%	0.87%	
New Mexico Operations	14.92%	13.03%	15.17%	13.05%	12.57%	12.57%	

HR Employee Relations

Company	2020 Percentage	2021 Percentage	2022 Percentage	2023 Percentage	Budget 2024 Percentage	Budget 2025 Percentage
Tampa Electric	76.70%	74.19%	95.40%	97.81%	97.75%	97.75%
Peoples Gas	19.76%	21.84%	2.08%	1.05%	1.10%	1.10%
TECO Partners	1.69%	2.01%	0.18%	0.09%	0.09%	0.09%
Gemstone	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
New Mexico Operations	1.85%	1.96%	2.34%	1.05%	1.06%	1.06%

Procurement

Company	2020 Percentage	2021 Percentage	2022 Percentage	2023 Percentage	Budget 2024 Percentage	Budget 2025 Percentage
Tampa Electric	75.41%	74.74%	74.70%	80.96%	85.41%	85.41%
Tampa Electric Inventory -Bayside	0.10%	0.06%	0.05%	0.06%	0.06%	0.06%
Tampa Electric Inventory -Big Bend	0.28%	0.14%	0.09%	0.23%	0.23%	0.23%
Tampa Electric Inventory -Polk	0.26%	0.06%	0.05%	0.05%	0.05%	0.05%
Tampa Electric Inventory ED	5.10%	4.79%	4.52%	8.06%	8.27%	8.27%
Tampa Electric Inventory Solar	0.00%	0.00%	0.00%	0.04%	0.04%	0.04%
Peoples Gas	16.90%	17.89%	17.83%	9.68%	2.50%	2.50%
Peoples Gas - Inventory	0.00%	0.58%	0.59%	0.00%	2.50%	2.50%
TECO Partners	0.42%	0.32%	0.28%	0.13%	0.13%	0.13%
New Mexico Operations	1.53%	1.42%	1.89%	0.79%	0.81%	0.81%

Administrative Services

Company	2020 Percentage	2021 Percentage	2022 Percentage	2023 Percentage	Budget 2024 Percentage	Budget 2025 Percentage
Tampa Electric	76.89%	76.00%	75.30%	74.31%	73.27%	73.27%
Peoples Gas	21.12%	22.00%	22.70%	23.66%	24.67%	24.67%
TECO Partners	1.99%	2.00%	2.00%	2.03%	2.06%	2.06%

Emergency Management

Company	2020 Percentage	2021 Percentage	2022 Percentage	2023 Percentage	Budget 2024 Percentage	Budget 2025 Percentage
Tampa Electric	61.16%	60.53%	59.98%	60.08%	59.16%	59.16%
Peoples Gas	16.80%	17.82%	18.08%	19.13%	19.93%	19.93%
New Mexico Operations	20.46%	20.01%	20.35%	19.15%	19.24%	19.24%
TECO Partners	1.58%	1.64%	1.59%	1.64%	1.67%	1.67%

Corporate Communications

Company	2020 Percentage	2021 Percentage	2022 Percentage	2023 Percentage	Budget 2024 Percentage	Budget 2025 Percentage	Comments
Tampa Electric	70.97%	78.38%	(1)	(1)	(1)	(1)	
Peoples Gas	26.53%	21.62%	(1)	(1)	(1)	(1)	*No longer an assessment in 2022 - moved to direct charging
TECO Partners	2.50%	0.00%	(1)	(1)	(1)	(1)	

Information Technology

Company	2020 Percentage	2021 Percentage	2022 Percentage	2023 Percentage	Budget 2024 Percentage	Budget 2025 Percentage
Tampa Electric	63.59%	62.90%	63.24%	63.11%	63.11%	63.11%
Tampa Electric Inventory -Bayside	0.15%	0.14%	0.14%	0.14%	0.14%	0.14%
Tampa Electric Inventory -Big Bend	0.40%	0.36%	0.38%	0.38%	0.38%	0.38%
Tampa Electric Inventory -Polk	0.06%	0.06%	0.06%	0.06%	0.06%	0.06%
Tampa Electric Inventory ED	0.62%	0.56%	0.59%	0.59%	0.59%	0.59%
Tampa Electric Conservation	0.28%	0.26%	0.26%	0.26%	0.26%	0.26%
Tampa Electric Zap Cap	0.02%	0.02%	0.02%	0.02%	0.02%	0.02%
Peoples Gas	17.89%	19.05%	19.65%	20.55%	20.55%	20.55%
TECO Partners	1.67%	1.73%	1.53%	1.51%	1.51%	1.51%
New Mexico Operations	15.32%	14.92%	14.13%	13.38%	13.38%	13.38%

Accounts Payable

Company	2020 Percentage	2021 Percentage	2022 Percentage	2023 Percentage	Budget 2024 Percentage	Budget 2025 Percentage
Tampa Electric	57.10%	46.09%	47.58%	47.56%	47.30%	47.30%
Peoples Gas	28.84%	33.61%	36.38%	36.98%	36.77%	36.77%
TECO Partners	2.11%	1.57%	1.13%	1.05%	1.25%	1.25%
Seacoast	1.26%	6.18%	2.78%	3.38%	3.44%	3.44%
TECO Energy	0.27%	1.01%	0.45%	0.49%	0.46%	0.46%
New Mexico Operations	10.42%	11.55%	11.68%	10.54%	10.78%	10.78%

Claims

Company	2020 Percentage	2021 Percentage	2022 Percentage	2023 Percentage	Budget 2024 Percentage	Budget 2025 Percentage
Tampa Electric	42.35%	36.57%	29.82%	17.42%	17.07%	17.07%
Peoples Gas	55.82%	62.63%	69.22%	81.07%	81.48%	81.48%
TECO Partners	0.08%	0.10%	0.04%	0.04%	0.04%	0.04%
TECO Energy	0.17%	0.11%	0.10%	0.09%	0.09%	0.09%
New Mexico Operations	1.58%	0.59%	0.82%	1.38%	1.32%	1.32%

INTERROGATORY NO. 98

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S FIFTH SET OF INTERROGATORIES
INTERROGATORY NO. 98
BATES(S) 26098 - 26102
MAY 13, 2024

98. Reconcile Affiliate Expense from MFR Schedule C-30 to MFR Schedule C-12. The attached Excel spreadsheet titled, "OPC Schedule 1 to Interrogatories – TECO Affiliate Expense" summarizes the Emera and affiliate expense charged to TECO for 2023 that is from Witness Latta's MFR Schedule C-30. In addition, MFR Schedule C-12, page 1 of 1, shows unadjusted and adjusted TECO A&G expenses for actual December 31, 2023, and estimated jurisdictional test year period December 31, 2025. Please address the following and provide supporting documentation at POD No. 74:

a. Please explain if TECO agrees with the amounts and totals by line-item description at attached OPC Schedule 1 or make all necessary changes along with an explanation for such changes.

b. Please explain if TECO agrees that for calendar year 2023, the total expenses charged to TECO by Emera and affiliates that is included in the A&G account (which excludes purchased gas expense and certain payroll costs not included in the A&G account) is $107,281,000. Make all necessary changes, and provide an explanation.

c. Please explain if TECO agrees that for calendar year 2023, the total expenses charged to TECO by Emera and affiliates (excludes purchased gas expense but includes other payroll costs not included in the A&G account) is $111,859,000. Make all necessary changes and provide an explanation.

d. MFR Schedule C-12, page 1 of 1, shows calendar year 2023 A&G expense of $146,422,000. Explain if 2023 TECO affiliate expense of $107,281,000 (per (b) above) is included in the 2023 A&G expense of $146,422,000 (or explain if the 2023 A&G expense includes other adjustments). Make all necessary changes and provide an explanation.

e. MFR Schedule C-12, page 1 of 1, shows jurisdictional test year December 31, 2025, A&G expense of $163,681,000. Explain and provide the amount of TECO affiliate expense by affiliate (and type of expense at OPC Schedule 1) that is included in the jurisdictional test year December 31, 2025, A&G expense of $163,681,000. Provide all budget information, and calculations to support the $163,681,000 of jurisdictional December 31, 2025, test year A&G expense.

f. Explain why MFR Schedule C-30 does not show any 2023 "credits" related to TECO charges to affiliates (although the form refers to "credit and debit" amounts), and explain where TECO charges to affiliates are shown at

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S FIFTH SET OF
INTERROGATORIES
INTERROGATORY NO. 98
BATES(S) 26098 - 26102
MAY 13, 2024**

FERC Form 1, MFR Schedule C-30, and identify other documents included in the Company's rate filing and provide this information for all years 2019 to 2023.

ANSWER:

a. During the company's review of "OPC Schedule 1 to Interrogatories – TECO Affiliate Expense" we noted certain amounts and line-item descriptions that we did not agree with. A revised Excel spreadsheet, titled "OPC Schedule 1 to Interrogatories – TECO Affiliate Expense TEC Revised" was constructed for the years 2020 through 2025. Changes include correcting the 2022 and 2023 data, the addition of 2020 through 2021 and 2024 through 2025 budget data, the addition of a new column indicating the affiliate transaction as a purchase or sale, the GL treatment on Tampa Electric's books for the affiliate transactions, and all affiliate transactions added to include all line items on FERC Form 1 page 457 and MFR Schedule C-30. To facilitate further understanding of the accounting treatment for the transactions recorded as Tampa Electric expense, the company is also providing a chart for 2020-2025 that reflects each FERC account charged and the dollar amounts charged to the account.

b. The company does not agree that the total expenses charged to Tampa Electric Company by Emera and affiliates, that are included in the A&G accounts, is $107,281,000 for 2023 as shown on OPC schedule 1, as that amount applies to 2025. As shown in our response to (a), the correct amount of expenses charged to Tampa Electric by Emera and all affiliates that is included in A&G for 2023 is $15,142,727. The original presentation included charges both to Tampa Electric and from Tampa Electric as aggregated positive numbers. The new presentation appropriately bifurcates charges from Affiliates to Tampa Electric and charges to Affiliates from Tampa Electric and further bifurcates A&G versus non-A&G expenses.

c. The company does not agree that the total expenses charged to Tampa Electric Company by Emera and affiliates is $111,859,000 for 2023 as shown on "OPC Schedule 1 to Interrogatories – TECO Affiliate Expense", as that amount applies to 2025. As shown in our response to (a), the correct amount of total expenses charged to Tampa Electric by Emera and affiliates is $17,492,640 for 2023 (Column C, Line 60). The original presentation included charges both to and from Tampa Electric as aggregated values. The new presentation bifurcates charges from Affiliates to Tampa Electric

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S FIFTH SET OF
INTERROGATORIES
INTERROGATORY NO. 98
BATES(S) 26098 - 26102
MAY 13, 2024**

and charges to Affiliates from Tampa Electric to demonstrate the correct amount of total charges from Affiliate to Tampa Electric in 2023.

d. The company does not agree that the total expenses charged to Tampa Electric Company by Emera and affiliates, that are included in the A&G accounts, is $107,281,000 for 2023 as shown on "OPC Schedule 1 to Interrogatories – TECO Affiliate Expense," as that amount applies to 2025. As shown in our response to (a), the correct amount of expenses charged to Tampa Electric by Emera and all affiliates that is included in A&G for 2023 is $15,142,727 (Col. B, Line 49). However, the net amount of affiliate charges (to and from Tampa Electric) is a ($13,163,452) credit (Col. B, Line 51) due to A&G credits related to allocations. The original presentation included charges both to Tampa Electric and from Tampa Electric as aggregated values. The new presentation bifurcates charges from Affiliates to Tampa Electric and charges to Affiliates from Tampa Electric and further bifurcates A&G versus non-A&G expenses. The total credit amount of ($13,163,452), is included in the 2023 A&G expense of $146,422,000, as seen on MFR Schedule C-12, page 1 of 1, and no further adjustments are made related to affiliate charges.

e. The total expenses charged to Tampa Electric Company by Emera and affiliates, that are included in the A&G accounts, is $13,859,000 for 2025 (Col. D, Line 49); however, the net amount of affiliate charges (to and from Tampa Electric) is a ($14,791,000) credit (Col D, Line 51) , due to A&G credits related to allocations. This net amount is included in the 2025 A&G expense of $163,681,000, as seen on MFR Schedule C-12. Please refer to the attachment provided in response to (a) for the breakdown of Tampa Electric affiliate expense by affiliate and type. The supporting workpapers for figures presented on MFR Schedule C-12 were provided in OPC's First Request for Production of Documents, No. 1.

f. Tampa Electric Company has consistently interpreted MFR Schedule C-30 to reflect all affiliate transactions, not just the transactions impacting Net Operating Income. In addition, the account number in column 6 describes either an account for affiliate charges to Tampa Electric, or FERC Account 146 for affiliate charges from Tampa Electric. Although the MFR provides a credit account, it does not specify debits and credits, and we have consistently used positive numbers regardless of the account number, consistent with FERC Form 1 pg. 457. Lastly, the company has interpreted affiliate transactions as services and gas purchases/sales but does not include convenience payments.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S FIFTH SET OF
INTERROGATORIES
INTERROGATORY NO. 98
BATES(S) 26098 - 26102
MAY 13, 2024**

Tampa Electric charges to affiliates fall into two categories, (1) direct charges to affiliates and, (2) indirect/allocation charges to affiliates. Direct charges to affiliates are reflected on the FERC Form 1 in FERC Account 146, balance sheet only. Indirect/allocation charges for shared services are reflected as a credit in FERC Account 922 on the income statement and O&M pages. See the attachment from the company's response to (a) above for a reconciliation of the treatment for these types of charges. These charges are also reflected on MFR Schedules B-3 and C-6.

POD NO. 74

74. **Reconcile Affiliate Expense from MFR Schedule C-30 to MFR Schedule C-12.** Please provide all documentation and calculations to support responses to Interrogatory No. 98 regarding the reconciliation of affiliate expenses included in A&G expenses from MFR Schedule C-30 to MFR Schedule C-12. Provide all documentation, budget information, and calculations to support the $163,681,000 of jurisdictional December 31, 2025, test year A&G expense.

Response: The company's non-confidential response to this request is included on the SharePoint in the folder entitled "POD_5_74." For documentation, budget information, and calculations to support the $163,681,000 of jurisdictional December 31, 2025, test year A&G expense, please refer to the company's response to OPC's First Set of Discovery, No. 1. The reconciliation used for the company's answer to Interrogatory 98 are sourced from MFR Schedule C-30 (please see the company's response to OPC's First Request for Production of Documents, No. 1). The 2022 diversification pages are included in this response. For the 2023 diversification pages, please see the company's response to OPC's Fifth Request for Production of Documents, No. 73(a), above.

75. **Reconcile Affiliate Expense from MFR Schedule C-30 to Exhibit No. RL-1.** Please provide all documentation and calculations to support responses to Interrogatory No. 99 regarding the reconciliation of affiliate expenses included in A&G expenses (along with Emera Corporate Overhead expenses) from MFR Schedule C-30 to Exhibit No. RL-1. Provide all documentation, budget information, and calculations to support the unadjusted A&G expense of $159,600,000 and the adjusted A&G expense of $158,000,000 (and all underlying adjustments) for the jurisdictional December 31, 2025, test year.

Response: Exhibit No. JC-2 is not intended to reconcile to MFR Schedule C-30 or Emera Corporate Overhead expenses; therefore, no reconciliation has been provided. However, for additional information, please see the company's response to OPC's Request for Production of Documents, No. 74, above. Exhibit No. RL-1 was created using trial balance and Surveillance Report data; however, no linked files were prepared for this document.

76. **Asset Management Agreement per Interrogatory No. 100.** Please provide all supporting documentation, calculations, and studies to support the Asset Management Agreement as addressed in Interrogatory No. 100. Provide all original studies and research relied upon to justify and support the increase in Asset Management Agreement expenses.

Response: As explained in the company's answer to OPC's 5th Set of Interrogatories, No. 100(b), Emera Energy Services Inc. did not provide any new services/products or incremental changes in existing services/products to TECO from 2022 to 2023.

OPC Schedule 1 to Interrogatories - TECO Affiliate Expense

2022 TECO Affiliate Expense - April 10, 2024, email from Mr. Wahlen to OPC including file "EI806-22-AR TEC 2022 FERC Form 1

2023 TECO Affiliate Expense - (FF1 457)

2025 TECO Affiliate Expense - Sch./MFR C-30 per Witness Latta Affiliate Transactions

	A	B Actual 2022	C Actual 2023
1	Emera Inc. Parent - Corporate Support Services	$ 10,821,559	$ 11,117,821
2	Emera Inc. Parent - Labor to TECO	4,572,472	3,738,956
3	Emera Inc. Parent - Labor from TECO	(153,924)	(330,187)
4	**Emera Subtotal**	**$ 15,240,107**	**$ 14,526,590**
5	Emera Energy Services Inc. - Asset Management Agreement	$ (4,915,335)	$ (4,134,342)
6	"" - Labor from TECO	(76,076)	(72,388)
7	"" Gas Sales	(289,021)	(117,544)
8	**EESI - Subtotal**	**$ (5,280,432)**	**$ (4,324,274)**
9	PGS - Corp. OH Allocation	$ (4,059,400)	$ (3,591,020)
10	"" - IT Allocation	(6,444,709)	(6,982,441)
11	"" - IT Usage Fee	(3,312,282)	(3,602,738)
12	"" - Labor from TECO	(15,294,429)	(14,440,922)
13	"" - Other labor	3,436,682	2,312,357
14	"" - Real property sublease	17,519	19,232
15	"" - Facilities Allocation	(277,269)	(320,174)
16	"" - Real property sublease	(918,374)	(882,326)
17	"" Gas Sales	(284,323)	(25,451)
18	"" Other Sales	(435,891)	(125,475)
19	"" - Benefits Adm., Admin., AP, Claims, Procurement, etc.	(3,290,075)	(3,071,108)
20	**PGS - Subtotal**	**$ (30,862,551)**	**$ (30,710,066)**
21	New Mexico Gas - Corp. OH Allocation	$ (2,576,549)	$ (2,425,799)
22	"" - IT Allocation	(4,634,287)	(4,546,232)
23	"" - IT Usage Fee	(1,407,534)	(1,662,109)
24	"" - Labor from TECO	(554,945)	(579,158)
25	"" - Labor to TECO	41,989	15,617
26	"" - IT Charges to TECO	247,132	158,238
27	"" - Benefits Adm., Admin., AP, Claims, Procurement, etc.	(927,867)	(851,581)
28	**NMG - Subtotal**	**$ (9,812,061)**	**$ (9,891,024)**
29	TECO Partners, Inc. - IT Allocation	$ (501,802)	$ (513,065)
30	"" - IT Usage Fee	(117,738)	(146,225)
31	"" - Labor from TECO	(65,555)	(69,611)
32	"" - Labor to TECO	243,412	2,707
33	"" - Rent & Lease	(32,598)	(32,583)
34	"" Other Sales	(314)	-
35	"" - Benefits Adm., Admin., AP, Claims, Procurement, etc.	(151,750)	(142,807)
36	**TECO Partners - Subtotal**	**$ (626,345)**	**$ (901,584)**
37	SeaCoast Gas Trans. - Corp. OH	$ -	$ (360,497)
38	"" - Labor from TECO	(74,513)	(57,507)
39	"" - Other	(47,122)	(52,452)
40	**SeaCoast - Subtotal**	**$ (121,635)**	**$ (470,456)**
41	**TECO Pipeline Holding Co - Corp. OH Alloc.**	**$ (305,218)**	**$ -**
42			
43	**Other Affiliates - Allocations from TECO**	$ (31,289)	$ (37,931)
44	**Other Affiliates -Labor + Other from TECO**	(1,155,280)	(1,033,646)
45	**Other Affiliates -Labor to TECO**	23,409	127,712
46	**Total Net Impact**	**$ (32,626,077)**	**$ (32,714,679)**
47			
48			
49	**Total Affiliate Charges to TECO (excl. Purchased Gas) in A&G Expense**	15,664,572	15,142,727
50	**Total Affiliate Charges from TECO (excl. Purchased Gas) in A&G Credit**	(27,779,673)	(28,306,179)
51	**Total A&G Impact**	**$ (12,115,101)**	**$ (13,163,452)**
52			
53	**Total Affiliate Direct Charges from TECO (excl. Purchased Gas), no Expense impact**	(18,761,899)	(17,623,803)
54	**Total Affiliate Direct Charges to TECO (excl. Purchased Gas), non-A&G**	3,739,602	2,349,913
55	**Total Affiliate Direct Charges to TECO (excl. Purchased Gas), Balance Sheet Only**	(5,488,679)	(4,277,337)
56	**Total Net Impact**	**$ (32,626,077)**	**$ (32,714,679)**

INTERROGATORY NO. 99

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S FIFTH REQUEST FOR PODS
MAY 13, 2024

Analysis of Diversification Activity

Individual Affiliated Transactions in Excess of $500,000

Company: Tampa Electric Company

For the Year Ended December 31, 2022

Provide information regarding individual affiliated transactions in excess of $500,000. Recurring monthly affiliated transactions which exceed $500,000 per month should be reported annually in the aggregate. However, each land or property sales transaction even though similar sales recur, should be reported as a "non-recurring" item for the period in which it occurs.

Name of Affiliate (a)	Description of Transaction (b)	Dollar Amount (c)
TECO Energy, Inc.	Labor Services	595,928
Peoples Gas System	IT Usage Fee	3,312,282
	Real Property Sublease	918,374
	Labor Services	15,294,429
	Corporate Overhead Allocation	4,059,400
	Accounts Payable Assessment	616,648
	Claims Assessment	514,258
	IT Assessment	6,444,709
	Procurement Assessment	839,071
	Labor Services	(3,436,682)
	Gas Purchases	(5,681,863)
TECO Partners Inc.	IT Assessment	501,802
New Mexico Gas Company, Inc.	IT Usage Fee	1,407,534
	Corporate Overhead Allocation	2,576,549
	Labor Services	554,945
	IT Assessment	4,634,287
Emera Inc.	Labor Services	(4,572,472)
	Corporate Support Services & Monthly Allocations	(10,821,559)
Emera Energy Services Inc	Asset Management Agreement	4,915,335
	Gas Purchases	(218,639,602)

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S FIFTH REQUEST FOR PODS
MAY 13, 2024

Analysis of Diversification Activity
Summary of Affiliated Transfers and Cost Allocations

Company: Tampa Electric Company
For the Year Ended December 31, 2022

Grouped by affiliate, list each contract, agreement, or other business transaction exceeding a cumulative amount of $300 in any one year, entered into between the Respondent and an affiliated business or financial organization, firm, or partnership identifying parties, amounts, dates, and product, asset, or service involved.
(a) Enter name of affiliate.
(b) Give description of type of service, or name the product involved.
(c) Enter contract or agreement effective dates.
(d) Enter the letter "p" if the service or product is purchased by the Respondent: "s" if the service or product is sold by the Respondent.
(e) Enter utility account number in which charges are recorded.
(f) Enter total amount paid, received, or accrued during the year for each type of service or product listed in column (c). Do not net amounts when services are both received and provided.

Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	"p" or "s" (d)	Total Charge for Year: Account Number (e)	Total Charge for Year: Dollar Amount (f)
TECO Energy, Inc.	Labor Services	A&R Services Agreement effective 01/01/13*	S	146	595,928
	Accounts Payable Assessment	Assigned Services Agreement effective 01/01/20*	S	146	7,628
	Claims Assessment	"	S	146	743
TECO Services Inc.	Labor Services	Assigned Services Agreement effective 01/01/20*	S	146	140,000
TECO Finance Inc.	Labor Services	Assigned Services Agreement effective 01/01/20*	S	146	8,635
TECO Gemstone Inc.	Benefits Admin Assessment	Assigned Services Agreement effective 01/01/20*	S	146	22,918
TECO Properties Corp	Labor Services	A&R Services Agreement effective 01/01/13*	S	146	2,940
TECO Pipeline Holding Company, LLC	Corporate Overhead Allocation	Assigned Services Agreement effective 01/01/20*	S	146	305,218
SeaCoast Gas Transmission, LLC	Labor Services	A&R Services Agreement effective 01/01/13*	S	146	74,513
	Accounts Payable Assessment	Assigned Services Agreement effective 01/01/20*	S	146	47,122
Peoples Gas System					
	IT Usage Fee	PGS is a Division of Tampa Electric Company	S	146	3,312,282
	Telecom Usage Fee	"	S	146	33,069
	Telecom Non-Standard	"	S	146	435,891
	Real Property Sublease	"	S	146	918,374
	Labor Services	"	S	146	15,294,429
	Facilities Allocation	"	S	146	277,269
	Telecom Allocation	"	S	146	380,894
	Corporate Overhead Allocation	Assigned Services Agreement effective 01/01/20*	S	146	4,059,400
	IT Assessment	"	S	146	6,444,709
	Benefits Admin Assessment	"	S	146	403,824
	Employee Relations Assessment	"	S	146	42,419
	Administrative Services Assessment	"	S	146	353,182
	Emergency Management Assessment	"	S	146	106,710
	Accounts Payable Assessment	"	S	146	616,648
	Claims Assessment	"	S	146	514,258
	Procurement Assessment	"	S	146	839,071
	Gas Sales (Fuels Services)	PGS is a Division of Tampa Electric Company	S	146	284,323
	Real Property Sublease	"	P	931	17,519
	Labor Services	"	P	Multi	3,436,682
	Gas Purchases	"	P	151	5,681,863
* Refer to Page 455					

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S FIFTH REQUEST FOR PODS
MAY 13, 2024

Analysis of Diversification Activity
Summary of Affiliated Transfers and Cost Allocations

Company: Tampa Electric Company
For the Year Ended December 31, 2022

Grouped by affiliate, list each contract, agreement, or other business transaction exceeding a cumulative amount of $300 in any one year, entered into between the Respondent and an affiliated business or financial organization, firm, or partnership identifying parties, amounts, dates, and product, asset, or service involved.
(a) Enter name of affiliate.
(b) Give description of type of service, or name the product involved.
(c) Enter contract or agreement effective dates.
(d) Enter the letter "p" if the service or product is purchased by the Respondent: "s" if the service or product is sold by the Respondent.
(e) Enter utility account number in which charges are recorded.
(f) Enter total amount paid, received, or accrued during the year for each type of service or product listed in column (c). Do not net amounts when services are both received and provided.

				Total Charge for Year	
Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	"p" or "s" (d)	Account Number (e)	Dollar Amount (f)
TECO Partners Inc.	IT Usage Fee	A&R Services Agreement effective 01/01/13*	S	146	117,738
	Telecom Usage Fee	"	S	146	2,740
	Telecom Non-Standard YP	"	S	146	314
	Rent and Lease	"	S	146	32,598
	Facilities Allocation	"	S	146	9,397
	Telecom Allocation	"	S	146	27,262
	IT Assessment	Assigned Services Agreement effective 01/01/20*	S	146	501,802
	Benefits Admin Assessment	"	S	146	35,973
	Employee Relations Assessment	"	S	146	3,671
	Administrative Services Assessment	"	S	146	31,117
	Emergency Management Assessment	"	S	146	9,384
	Accounts Payable Assessment	"	S	146	19,154
	Claims Assessment	"	S	146	297
	Procurement Assessment	"	S	146	12,755
	Labor Services	"	S	146	65,555
	Labor Services	"	P	Multi	243,412
New Mexico Gas Company, Inc.	IT Usage Fee	A&R Services Agreement effective 01/01/13*	S	146	1,407,534
	Telecom Usage Fee	"	S	146	470
	Labor Services	Assigned Services Agreement effective 01/01/20*	S	146	554,945
	Telecom Allocation	A&R Services Agreement effective 01/01/13	S	146	29,317
	Corporate Overhead Allocation	Assigned Services Agreement effective 01/01/20*	S	146	2,576,549
	IT Assessment	"	S	146	4,634,287
	Benefits Admin Assessment	"	S	146	440,087
	Employee Relations Assessment	"	S	146	47,721
	Emergency Management Assessment	"	S	146	120,108
	Accounts Payable Assessment	"	S	146	197,978
	Claims Assessment	"	S	146	6,092
	Procurement Assessment	"	S	146	86,094
	Labor Services	A&R Services Agreement effective 01/01/13*	P	Multi	41,989
	IT Charges	"	P	930.2/Multi	247,132
* Refer to Page 455					

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S FIFTH REQUEST FOR PODS
MAY 13, 2024

Analysis of Diversification Activity
Summary of Affiliated Transfers and Cost Allocations

Company: Tampa Electric Company
For the Year Ended December 31, 2022

Grouped by affiliate, list each contract, agreement, or other business transaction exceeding a cumulative amount of $300 in any one year, entered into between the Respondent and an affiliated business or financial organization, firm, or partnership identifying parties, amounts, dates, and product, asset, or service involved.
(a) Enter name of affiliate.
(b) Give description of type of service, or name the product involved.
(c) Enter contract or agreement effective dates.
(d) Enter the letter "p" if the service or product is purchased by the Respondent: "s" if the service or product is sold by the Respondent.
(e) Enter utility account number in which charges are recorded.
(f) Enter total amount paid, received, or accrued during the year for each type of service or product listed in column (c). Do not net amounts when services are both received and provided.

				Total Charge for Year	
Name of Affiliate (a)	Type of Service and/or Name of Product (b)	Relevant Contract or Agreement and Effective Date (c)	"p" or "s" (d)	Account Number (e)	Dollar Amount (f)
Emera Inc.	Labor Services	Assigned Services Agreement effective 01/01/20**	S	146	153,924
	Labor Services	Shared Services Agreement effective 01/01/21*	P	Multi	4,572,472
	Corporate Support Services & Monthly Allocations	Shared Services Agreement effective 01/01/21*	P	930.2/Multi	10,821,559
Grand Bahama Power Company	Labor Services	A&R Services Agreement effective 07/01/16* and Assigned Services Agreement effective 01/01/20*	S	146	35,656
Nova Scotia Power	Labor Services	A&R Services Agreement effective 01/01/17*	S	146	80,255
	Rent & Utilities for Telecom Circuits	"	S	146	11,815
Emera Energy Services Inc.	Labor Services	Assigned Services Agreement effective 01/01/20*	S	146	76,076
	Asset Management Agreement	Asset Management Agreement* 08/01/2018-03/31/21	S	146	4,915,335
	Gas Sales	Natural gas sales and purchase agreement Effective 02/01/17	S	146	289,021
	Gas Purchases	"	P	151	218,639,602
Emera Technologies LLC	Labor Services	A&R Services Agreement effective 01/01/18* and Assigned Services Agreement effective 01/01/20*	S	146	143,275
Emera Grand HVAC	Labor Services	Assigned Services Agreement effective 01/01/20*	S	146	555
Emera Energy U.S. Sub #1, Inc.	Labor Services	Assigned Services Agreement effective 01/01/20*	S	146	61,948
Scotia Power U.S., Ltd.	Labor Services	Assigned Services Agreement effective 01/01/20*	S	146	25,363
Emera Caribbean Holdings Limited	Labor Services	Assigned Services Agreement effective 01/01/20*	S	146	33,585
	Labor Services	Assigned Services Agreement effective 01/01/20*	P	Multi	23,409
New Brunswick	Labor Services	Assigned Services Agreement effective 01/01/20*	S	146	360
Emera Energy Inc.	Labor Services	"	S	146	14,605
Emera Carribean Inc.	Labor Services	"	S	146	360

*This excludes $ 1,828,343 in equipment purchased from ETL related to Tampa Electric's Direct Current Microgrid Pilot Program in southern Hillsborough County, Florida. The dollar figure provided is only related to the services provided.

* Refer to Page 455

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S FIFTH SET OF
INTERROGATORIES
INTERROGATORY NO. 99
BATES(S) 26103 - 26104
MAY 13, 2024

99. Reconcile Affiliate Expense MFR Schedule C-30 to Exhibit No. RL-1. The attached Excel spreadsheet titled, "OPC Schedule 1 to Interrogatories – TECO Affiliate Expense" summarizes the Emera and affiliate expense charged to TECO for 2023 that is from Witness Latta's MFR Schedule C-30. In addition, Witness Latta sponsors Exhibit No. RL-1, Document No. 4, page 1 of 1, showing A&G expense categories for 2022, 2023, and estimated 2024 and estimated jurisdictional test year December 31, 2025, Please address the following and provide supporting documentation at POD No. 75:

a. Witness Latta Exhibit No. RL-1, Document No. 4, page 1 of 1, shows unadjusted A&G Benefits, Technology, and Corporate expenses of $149,700,000 for December 31, 2023, and shows adjusted A&G Benefits, Technology, and Corporate expenses of $136,400,000 for this same period. Explain and show how the $107,281,000 of 2023 TECO affiliate expense included in A&G expense from OPC Schedule 1 reconciles to these 2023 "unadjusted" and "adjusted" A&G amounts by affiliate and type of affiliate expense, and identify the amount of "adjustments" by affiliate and type of expense. Provide all supporting documentation and calculations.

b. Regarding (f) above, explain the reasons for the changes from 2023 affiliate expense of $107,281,000 included in the A&G expense (per OPC Schedule 1) to the updated jurisdictional test year December 31, 2025, unadjusted A&G of $159,600,000 and the adjusted A&G of $158,000,000, and show all adjustments by affiliate and type of affiliate expense. Provide all supporting calculations.

c. Witness Latta Exhibit No. RL-1, Document No. 4, page 1 of 1, shows Corporate affiliate expenses included in A&G on December 31, 2023, consisting of $25,500,000 unadjusted and $13,800,000 adjusted (a reduction of $11,700,000). In comparison, OPC Schedule 1 shows actual 2023 Emera Corporate Overhead expense charged to TECO of $16,600,000. Explain why the 2023 unadjusted ($25.5M) or adjusted ($13.8M) Emera Corporate affiliate expenses at Exhibit No. RL-1 do not reconcile to the 2023 Corporate Overhead expense of $l6.6M at OPC Schedule 1 (MFR C-30 per Witness Latta). Provide a reconciliation, along with all supporting calculations.

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S FIFTH SET OF
INTERROGATORIES
INTERROGATORY NO. 99
BATES(S) 26103 - 26104
MAY 13, 2024

ANSWER:

a. Please see Tampa Electric's answer to Interrogatory No. 98 (a), above for the net amount of affiliate charges contained in A&G accounts totaling ($13,163,452). This full amount is included in the unadjusted A&G expenses of $149,700,000 and adjusted A&G expenses of $136,400,000 for 2023. Tampa Electric does not make any adjustments for affiliate charges in A&G accounts. For additional information on this presentation, see response to the company's answer to Interrogatory No. 98 (d), above.

b. Tampa Electric does not make any adjustments for affiliate charges in A&G accounts. The unadjusted and adjusted A&G figures presented on Witness Chronister's Exhibit No. JC-2, Document No. 4 (formerly Witness Latta's exhibit) represent the total A&G costs incurred by the company, which includes affiliate charges. The adjustments reflected on the exhibit are related to commission adjustments.

c. The unadjusted and adjusted Corporate A&G figures presented on Witness Chronister's Exhibit No. JC-2, Document No. 4 (formerly witness Latta's exhibit) represent the total Corporate A&G costs incurred by the company, which is not the same as the Emera Corporate Overhead charges referenced in OPC Document 1. With this distinction, no reconciliation is necessary as the two figures do not present the same information.

POD NO. 75

74. **Reconcile Affiliate Expense from MFR Schedule C-30 to MFR Schedule C-12.** Please provide all documentation and calculations to support responses to Interrogatory No. 98 regarding the reconciliation of affiliate expenses included in A&G expenses from MFR Schedule C-30 to MFR Schedule C-12. Provide all documentation, budget information, and calculations to support the $163,681,000 of jurisdictional December 31, 2025, test year A&G expense.

Response: The company's non-confidential response to this request is included on the SharePoint in the folder entitled "POD_5_74." For documentation, budget information, and calculations to support the $163,681,000 of jurisdictional December 31, 2025, test year A&G expense, please refer to the company's response to OPC's First Set of Discovery, No. 1. The reconciliation used for the company's answer to Interrogatory 98 are sourced from MFR Schedule C-30 (please see the company's response to OPC's First Request for Production of Documents, No. 1). The 2022 diversification pages are included in this response. For the 2023 diversification pages, please see the company's response to OPC's Fifth Request for Production of Documents, No. 73(a), above.

75. **Reconcile Affiliate Expense from MFR Schedule C-30 to Exhibit No. RL-1.** Please provide all documentation and calculations to support responses to Interrogatory No. 99 regarding the reconciliation of affiliate expenses included in A&G expenses (along with Emera Corporate Overhead expenses) from MFR Schedule C-30 to Exhibit No. RL-1. Provide all documentation, budget information, and calculations to support the unadjusted A&G expense of $159,600,000 and the adjusted A&G expense of $158,000,000 (and all underlying adjustments) for the jurisdictional December 31, 2025, test year.

Response: Exhibit No. JC-2 is not intended to reconcile to MFR Schedule C-30 or Emera Corporate Overhead expenses; therefore, no reconciliation has been provided. However, for additional information, please see the company's response to OPC's Request for Production of Documents, No. 74, above. Exhibit No. RL-1 was created using trial balance and Surveillance Report data; however, no linked files were prepared for this document.

76. **Asset Management Agreement per Interrogatory No. 100.** Please provide all supporting documentation, calculations, and studies to support the Asset Management Agreement as addressed in Interrogatory No. 100. Provide all original studies and research relied upon to justify and support the increase in Asset Management Agreement expenses.

Response: As explained in the company's answer to OPC's 5th Set of Interrogatories, No. 100(b), Emera Energy Services Inc. did not provide any new services/products or incremental changes in existing services/products to TECO from 2022 to 2023.

INTERROGATORY NO. 156

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S EIGHTH SET OF
INTERROGATORIES
INTERROGATORY NO. 156
BATES PAGE(S): 28877 - 28878
MAY 16, 2024**

156. **FERC Form 1 Reduction in TECO Costs Charged to Affiliates.** Information that TECO provided in the FERC Form 1 affiliate diversification data shows that TECO total expenses allocated/assigned to affiliates decreased from 2022 to 2023 (for all charges designated as "S" from TECO to affiliates). Please address the following:

a. Given that there seems to be a decrease in TECO expenses allocated/assigned to affiliates from 2022 to 2023 (which appears to be due to a reduction in both labor and non-labor costs, allocated labor costs, and IT charges for 2023), explain why this expense reduction will or will not continue for budgeted/estimated years 2024 and 2025.

b. Regarding (a) above, provide all supporting calculations for TECO's position, and explain what events, nonrecurring costs, or other conditions occurred from 2022 to 2023 that resulted in a reduction in expenses charged by TECO to affiliates that will not be recurring in the future years 2024 and 2025.

c. Regarding (a) and (b), if there will be an increase in TECO expenses allocated/assigned to affiliates in budgeted years 2024 and 2025, then explain if this means there will also be a corresponding increase in TECO's related total expenses that will remain on TECO's books.

d. Regarding (b) and (c) above, if there will be an decrease in TECO expenses allocated/assigned to affiliates in budgeted years 2024 and 2025, then explain if this means there will also be a corresponding decrease in TECO's related total expenses that will remain on TECO's books.

ANSWER

a. The reduction of affiliate transactions designated as sales ("S") on the FERC Form 1 is projected to continue for the budgeted years. Labor to the affiliates and certain assessments are budgeted to be lower in 2024 and/or 2025 compared to 2023 actuals. Please see Tampa Electric's response to OPC's Ninth Request for Production of Documents, No. 118.

b. The decrease from 2022 to 2023 for costs designated as "S" was due to lower Asset Management Agreement (AMA) activity. Labor costs decreased by $136 thousand, while AMA activity saw a reduction of $781 thousand.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S EIGHTH SET OF
INTERROGATORIES
INTERROGATORY NO. 156
BATES PAGE(S): 28877 - 28878
MAY 16, 2024**

c. In 2024, TECO Services, Inc. (TSI) will be legally dissolved and seconded employees that work strictly for Emera affiliates will be moved from TECO Services, Inc. to Tampa Electric Company. The company will see an increase in affiliate transactions from Tampa Electric to the Emera affiliates; however, this will not result in an increase of expenses remaining on Tampa Electric's books. Please refer to OPC's 6th Set of Interrogatories No. 104 (Bates Stamp page 19877 & 19878) for treatment of affiliate receivables.

d. The direct labor and the AMA activity seen referred to in (b) above and the increase in affiliate transactions related to the dissolution of TSI seen in (c) above will not result in a corresponding decrease in Tampa Electric's related total expenses that will remain on company's books. Direct charges only result in a debit to FERC account 146 to recognize the affiliate receivable; no FERC expense accounts are charged.

POD NO. 119

118. **FERC Form 1 Reduction in Affiliate Costs Charged to TECO.** Please provide copies of all detailed information and related supporting documentation to your response for Interrogatory No. 155. For subpart (a) of this interrogatory, provide all supporting documentation and calculations, including showing the budgeted expenses charged by Emery/affiliates to TECO for years 2024 and 2025 in a similar format as the FERC Form 1 affiliate diversification data. For subpart (b) of this interrogatory, provide all supporting documentation.

Response: Tampa Electric's non-confidential electronic documents responsive to this request will be served by posting on the SharePoint in the folder entitled "POD_9_118."

119. **FERC Form 1 Reduction in TECO Costs Charged to Affiliates.** Please provide copies of all detailed information and related supporting documentation to your response for Interrogatory No. 156. For subpart (a) of this interrogatory, provide all supporting documentation and calculations, including showing the budgeted expenses charged by TECO to affiliates for years 2024 and 2025 in a similar format as the FERC Form 1 affiliate diversification data. In addition, provide all supporting documentation and calculations showing the 2024 and 2025 budgeted TECO expenses subject to allocation/assignment to affiliates, and the related total amount allocated/assigned to affiliates in a format similar to the 2023 FERC Form 1 affiliate diversification data showing expenses allocated/assigned from each affiliate to TECO for subparts (c) of this interrogatory and allocated from TECO to each affiliate for subparts (d) of this interrogatory.

Response: Please see Tampa Electric's response to OPC's Ninth Request for Production of Documents, No. 118.

120. **Nova Scotia Utility Board 2022 Report IT Charges.** Please provide copies of all detailed information and related supporting documentation to your response for Interrogatory No. 157. For subpart (a) of this interrogatory, provide all supporting documentation. For subpart (b) of this interrogatory, if there was a change in 2022 or 2023 regarding allocation/assignment of IT-related charges among affiliates, provide supporting documentation to explain this change.

Response: The documents responsive to this request contain proprietary confidential business information. Tampa Electric will serve its confidential electronic documents responsive to this request by posting in the Confidential Section of the SharePoint Site in the folder entitled "CONF_POD_9_120."

Please see POD 120 folder with the file titled Appendiix D(09a) M&A services To Affiliates 2023.pdf

INTERROGATORY NO. 61

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S SECOND SET OF INTERROGATORIES
INTERROGATORY NO. 61
BATES PAGE(S): 18144 - 18146
APRIL 22, 2024

61. **Top Down Allocation of Affiliate Costs to TECO**. Please address the following regarding the allocation of Emera and affiliate expenses and capitalized costs to TECO for the calendar years 2019 to 2023 (and estimated amounts for 2024 and this rate case proceeding) using a top down approach (starting with Emera/parent company costs and showing the allocated costs through all intermediate companies (service companies) to the final allocation to TECO):

a. First, using a working Excel spreadsheet if possible, please provide a side-by-side comparison for each of the calendar years 2019 to 2023 (and estimated/budgeted amounts for 2024) of the amount of Emera expenses and capital costs (provide these amounts separately) that are subject to allocation/assignment to each service company and all affiliates. Please show these separate allocated/assigned expense and capital costs by:

   i. functional area/group (Corporate, Human Resources, Tax, Legal, etc.), and also by:
   ii. type of expense (payroll, insurance, rent, outside services, etc.) and capital cost (each type of capital asset) included in each of the functional areas/groups in (i) above.

b. Regarding (a) above, if possible, reconcile the amount of Emera costs subject to allocation to the actual types of Emera expenses shown at Emera consolidated Annual Reports (for periods 2019 to 2023) and explain the reasons for all differences between Emera allocated expenses and Emera expenses at the Annual Reports.

c. Second, using a working Excel spreadsheet if possible, please provide a side-by-side comparison for each of the calendar years 2019 to 2023 (and estimated/budgeted amounts for 2024) of the amount of Emera expenses and capital costs (provide these amounts separately) allocated/assigned to each Service Company prior to allocation to each specific affiliate (and if applicable, explain why more than one Service Company is used). Please show each of the Service Company allocated/assigned expense and capital costs by:

   i. functional area/group (Corporate, Human Resources, Tax, Legal, etc.), and also by:

   ii. type of expense (payroll, insurance, rent, outside services, etc.) and capital cost (each type of capital asset) included in each of the functional areas/groups in (i) above.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 61
BATES PAGE(S): 18144 - 18146
APRIL 22, 2024**

d. Regarding (c) above, explain each type of allocation method, and provide the specific allocation factor percent (numerator divided by denominator), used to allocate each type of pooled cost (or cost by functional area/group) from Emera to each of the Service Companies. Provide all underlying calculations and supporting documentation for the numerator and denominator of each allocation factor for each of the periods 2019 to 2023 (and estimated/budgeted for 2024).

e. Third, using a working Excel spreadsheet if possible, please provide a side-by-side comparison for each of the calendar years 2019 to 2023 (and estimated/budgeted amounts for 2024) of the amount of Service Company expenses and capital costs (provide these amounts separately) allocated/assigned to TECO and each affiliate (or provide this information for allocations directly from Emera if intermediary Service Companies are not used).

f. Regarding (e) above, for TECO only (for actual 2019 to 2023, and estimated/budgeted 2024), show the amount of Service Company expense and capital costs allocated/assigned to TECO by detailed accounts below:

    i. functional area/group (Corporate, Human Resources, Tax, Legal, etc.), and also by:

    ii. type of expense (payroll, insurance, rent, outside services, etc.) and capital cost (each type of capital asset) included in each of the functional areas/groups in (i) above.

g. Regarding (e) above, explain each type of allocation method, and provide the specific allocation factor percent (numerator divided by denominator), used to allocate each type of pooled cost (or cost by functional area/group) from the Service Companies to TECO and each affiliate. Provide all underlying calculations and supporting documentation for the numerator and denominator of each allocation factor for each of the periods 2019 to 2023 (and estimated/budgeted for 2024).

h. Regarding (d) and (g) above, if applicable, explain why different allocation methods are used to allocate affiliate costs from Emera to the Service Companies, compared to the allocation methods used to allocate affiliate costs from the Service Companies to TECO and each affiliate.

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 61
BATES PAGE(S): 18144 - 18146
APRIL 22, 2024

i. Regarding (d) and (g) above, if applicable, explain if and why the Company uses different allocation methods for allocating costs from Emera (or allocating costs from Service Companies) to regulated utilities versus unregulated operations.

j. Explain why each of the allocation methods identified in (d) and (g) above are reasonable to use for each of the types of pooled costs (or the functional area/group costs that are subject to allocation). Explain the correlation between the numerator/denominator inputs of the allocation factors and how these act to drive each of these specific costs.

k. For each of the periods 2019 to 2024, explain when new or revised allocation methods or allocation factors were introduced and explain why it was reasonable to make these changes to allocation methods/factors.

l. Explain and cite to other companies that use similar or the same cost allocation methods used by Emera in allocating costs to Service Companies and affiliates.

Answer:

In addition to its general objections, which are incorporated herein by reference, Tampa Electric objects to this interrogatory on grounds that it is overbroad; burdensome; presumes facts about the way affiliate costs are charged and allocated to and from Tampa Electric that are inconsistent with the approach used by Emera, its subsidiaries, and Tampa Electric; and seeks information that is beyond the scope of discovery in this case. Notwithstanding these objections, Tampa Electric has consulted with OPC and its consultant, has provided preliminary information responsive to this interrogatory before the prescribed answer date, and is continuing to work cooperatively and in good faith with OPC and its consultant to provide a reasonable and responsive answer. Please see Tampa Electric's confidential response to OPC's Second Request for Production of Documents, No. 37.

POD NO. 37

a. Provide a copy of the related "Engagement Letter" for each of these Reports for each of the periods 2019 to 2024 that address, or impact costs allocated/assigned to TECO.

b. For each auditor/CPA Report that address costs allocated/assigned to TECO for the periods 2019 to 2024, provide that portion of the Report (or related workpapers) that show the amount of affiliate expenses and capital costs allocated/assigned to TECO for each period by functional area/group (Corporate, Human Resources, Tax, Legal, etc.) or type of expense (payroll, insurance, rent, outside services, etc.) included in each of the functional areas/groups.

Response:

The company has no responsive documents to this request. As explained in the company's answer to OPC's Second Set of Interrogatories, No. 59, no independent audit was performed.

36. Please provide a copy of their curriculum vitae for the names of all witnesses in the current TECO rate case that address specific issues related to CAM and costs allocated/assigned to TECO from Emera and all affiliates, and provide an actual PDF copy of their testimony that cannot be provided with a citation and link to their testimony addressing these issues in other rate case/regulatory proceedings in the most recent 5-year period.

Response:

Please see Tampa Electric's answer to OPC's Second Set of Interrogatories, No. 60 which provides information related to the testimony of the witnesses that are the subject of this request. There are no responsive curriculum vitae to provide.

37. Please provide copies of any documentation that supports the rationale, calculations and conclusions for your responses to Interrogatory No. 61.

Response:

In addition to its general objections, which are incorporated herein by reference, Tampa Electric objects to this request on grounds that it relates to an interrogatory that is overbroad; burdensome; presumes facts about the way affiliate costs are charged and allocated to and from Tampa Electric that are inconsistent with the approach used by Emera, its subsidiaries, and Tampa Electric; and seeks information that is beyond the scope of discovery in this case. Notwithstanding these objections, Tampa Electric has consulted with OPC and its consultant, has provided preliminary information responsive to Interrogatory No. 61 before the prescribed answer date, has posted confidential documents

INTERROGATORY NO. 177

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF
INTERROGATORIES
INTERROGATORY NO. 177
BATES PAGE(S): 30608 - 30612
MAY 23, 2024**

177. "OPC IRR 95b - Allocation Factor Percentages" Factors for Allocating Costs from TECO to Affiliates. TECO provided the above noted Excel spreadsheets to OPC on or about April 27, 2024, showing sample calculations of various allocation factors (used for allocating costs from TECO to affiliates/allocable costs), including HR Benefits Admin., HR Employees Relations, etc. Please address the following:

a. Regarding the TECO "HR Benefits Admin." allocation factor percentages, explain why the allocation factor was relatively stable in 2020 and 2021 at about 66.61%, increased in 2022 to 68.88%, increased in 2023 by a greater amount to 71.51%, and then increased significantly for Budget 2024/2025 purposes to 71.97%. Provide all calculations to support the reasons for the increase in allocation factors for 2023 and the 2024/2025 Budget.

b. Regarding (a) above, explain the corresponding reduction in the NMG allocation factor from 15.17% in 2022 to $12.57% for 2024/2025 Budget, and provide all calculations to support the reasons.

c. Regarding the TECO "HR Employee Relations" allocation factor percentages, explain why the allocation factor was relatively stable in 2020 and 2021 at about 76.70% to 74.19%, increased significantly in 2022 to 95.40%, increased again in 2023 to a factor of 97.81%, and then increased for Budget 2024/2025 purposes to 97.75%. Provide all calculations to support the reasons for the increase in allocation factors from 2021 through 2024/2025 Budget.

d. Per the NMG "HR Benefits Admin" factor and the "HR Employee Relations" factor, explain why HR Benefits Admin. allocates about 13% to 15% of these costs to NMG but "HR Employee Relations" allocates significantly less costs using a reduced factor of 1% to 2%, explain why HR-related functions would not be similar in their respective allocation factors – and explain why different allocation inputs are used for these HR-related functions.

e. Regarding the TECO "Procurement" allocation factor percentages, explain why the allocation factor was relatively stable from 2020 to 2023 at about 75.41% to 74.70%, but increased significantly in 2022 to 80.96%, and then significantly increased for Budget 2024/2025 purposes to 85.41%. Provide

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF
INTERROGATORIES
INTERROGATORY NO. 177
BATES PAGE(S): 30608 - 30612
MAY 23, 2024**

all calculations to support the reasons for the increase in allocation factors from 2022 through 2024/2025 Budget.

f. Explain why this Excel spreadsheet does not show allocation factors used in allocating/assigning TECO costs to affiliates NSP, TECO Energy (which receives a similar allocation of costs as TECO Partners in 2022 and 2023), TECO Services, Emera Technologies, and SeaCoast. Provide the related allocation factors for these affiliates in a similar format and explain the reasons for changes in allocation factors from 2020 to 2024/2025 Budget.

g. For the affiliates noted in (f) above, explain why the Excel spreadsheet does not show any allocation factors for the Corporate Overhead, IT, HR, Administrative Services and other function costs from 2020 to 2024/2025 Budget – and provide these related allocation factors.

h. Regarding the "2024/2025 Budget" allocation factors for each function at this Excel spreadsheet, explain if TECO budgeted expenses for account 923 were determined in this rate case by using the related 2024/2025 Budget allocation factors provided in this Excel spreadsheet.

ANSWER:

In addition to the answer below, please see Tampa Electric's response to "OPC Clarification Questions for TECO TEAMs Call – May 16, 2024".

a. As described in the TECO Cost Allocation Manual ("CAM"), provided in the company's response to OPC's Second Request for Production of Documents, No. 34, the costs following the HR Benefits Admin assessment are charged to affiliates that benefit from described services using a statistical shared services assessment methodology. The support for each affiliate could change year over year, as necessary. The requested detailed calculations have been provided in OPC's Fifth Request for Production of Documents, No. 71. The change in the HR Benefits Admin allocation factor from 2020 to 2021 was insignificant as the employee count decreased at Tampa Electric with offsets related to changes in the support provided to operating companies. The increase from 66.61 percent in 2021 to 68.88 percent in 2022 was caused by a reduction in services provided to Peoples Gas Services ("PGS"), specifically in the Administration, Healthcare and Compensation/HRIS areas. The increase in the allocation factor from 68.88 percent in 2022 to 71.51 percent in 2023 and 71.97 percent in 2024/2025 is related to active employee count at each affiliate. In the 2022 assessment calculation, Tampa Electric's active employee count comprised 60 percent of the total TECO employee count versus 64 percent in 2023 and 63 percent budgeted in the 2024/2025 assessment, supporting the increase in Tampa Electric's allocation percentage in those years with slight changes to the support provided to operating companies in 2024/2025.

b. Please see Tampa Electric answer to OPC's Sixth Set of Interrogatories, No. 96(e) and OPC's Fifth Request for Production of Documents, No. 71 for the related calculations. The assessment methodology used to calculate this percentage is based off of active employee count at each affiliate. In the 2022 assessment calculation, New Mexico Gas Company's ("NMGC") active employee count comprised 20 percent of the total TECO employee count versus 17 percent budgeted in 2024/2025.

c. As described in the TECO CAM, provided in the company's response to OPC's Second Request for Production of Documents, No. 34, the costs following the HR Employee Relations assessment are charged to affiliates that benefit from described services using a statistical shared services assessment methodology. The support for each affiliate could change year over year as necessary. The requested detailed calculations have been provided in the company's response to OPC's Fifth Request for Production of Documents, No. 71. The decrease in the allocation factor from 76.70 percent in 2020 to 74.19 percent in 2021 was due to a decrease in Tampa Electric employee count and an increase in PGS employee count. The increase from 74.19 percent in 2021 to 95.40 percent in 2022 was caused by reduced services provided to PGS, specifically in the Labor/Employee Relations, Training & Development and Recruitment & Staffing areas. The increase from 95.40 percent in 2022 to 97.81 percent in 2023 and 97.75 percent in 2024/2025 was driven by active employee count. In the 2022 assessment calculation, Tampa Electric's active employee count comprised

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF
INTERROGATORIES
INTERROGATORY NO. 177
BATES PAGE(S): 30608 - 30612
MAY 23, 2024**

60 percent of the total TECO employee count versus 64 percent in 2023 and 63 percent budgeted in the 2024/2025 assessment supporting the increase in Tampa Electric's allocation percentage in those years. The predominant cause of the changes above was the establishment of separate Labor/Employee Relations, Training & Development and Recruitment & Staffing functional groups at PGS.

d. There are two primary reasons that these factors are different: (1) the factors reflect different support profiles and (2) the costs incurred at Tampa Electric are impacted by the existence of HR functional groups in affiliate companies, which reduces the services required to be provided by Tampa Electric.

(1) "HR Benefits Admin" relates to the administration of benefit programs provided to employees at various affiliated companies. "HR Employee Relations" relates to the remainder of human resources functions conducted for various affiliated companies. These two separate Human Resources-related allocations vary as the services provided vary. The TECO Energy CAM, provided in the company's response to OPC's Second Request for Production of Documents, No. 34 describes the different services provided by Tampa Electric.

(2) The factor for NMGC has been impacted by the existence of separate Labor/Employee Relations, Training & Development, Recruitment & Staffing, and other HR functional groups at NMGC.

e. As described in the TECO CAM, provided in the company's response to OPC's Second Request for Production of Documents, No. 34, the costs following the Procurement assessment allocate costs proportionately based on the percentage of total procurement purchase order spend for each company as a percent of total procurement purchase order spend for all companies that receive this service. The support for each affiliate could change year over year as PO spend and team member support changes. The requested detailed calculation for 2022 has been provided the company's response to OPC's Fifth Request for Production of Documents,

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF
INTERROGATORIES
INTERROGATORY NO. 177
BATES PAGE(S): 30608 - 30612
MAY 23, 2024**

No. 71. Additionally, please see the company's response to OPC's Eleventh Request for Production of Documents, No. 136 for 2023-2024 calculations.

The increase from 2022 to 2023 and 2024/2025 was related to lower support provided to PGS. In addition to this, as mentioned in Christian Richard's testimony in the PGS rate case, PGS established its own supply chain management group in 2023 which resulted in a higher allocation to Tampa Electric. In 2023, the Director of Procurement no longer provided services to PGS and in 2024/2025, PGS transitioned to their own procurement team.

f. The excel spreadsheet referenced only encompasses the Tampa Electric Shared Service departments and their allocation factor percentages to affiliates that they service. As described in the TECO CAM, provided in the company's response to OPC's Second Request for Production of Documents, No '34, the costs following these assessments are charged to affiliates that benefit from described services using statistical shared services assessment methodologies. NSP, TECO Energy, TECO Services, Emera Technologies, and SeaCoast do not receive these services.

g. The functions that flow through the Corporate Overhead, IT, HR, and Admin Services assessments do not service the companies stated. NSP, TECO Energy, TECO Services, Emera Technologies, and SeaCoast do not receive these services.

h. The budgeted expenses for FERC account 923 in this rate case were determined using the same methodology used for budgeting all O&M expense as described in witness Chronister's pre-filed testimony volume II (page 16 – 18). The allocation factors reflected on the Excel spreadsheet impact the 2024/2025 budget amounts through the budgeting of credits to FERC account 922 for the portion that is allocated to affiliates.

POD NO. 136

136. **"OPC IRR 95b - Allocation Factor Percentages" Factors for Allocating Costs from TECO to Affiliates.** Please provide copies of all detailed information and related supporting documentation addressing allocation factor percentages in your response to Interrogatory No. 177.

Response:

Tampa Electric's non-confidential electronic documents responsive to this request will be served by posting on the SharePoint in the folder entitled "POD_11_136."

137. **Headcount Allocation Factors for Allocating/Assigning Costs from TECO to Affiliates.** Please provide copies of all detailed information and related supporting documentation addressing headcount factors in your response to Interrogatory No. 178.

Response:

The company does not have responsive documents for this request.

138. **2021-2023 Emera Allocations to TECO (and Other Affiliates) Do Not Reconcile to FERC Form 1.** Please provide copies of all detailed information and related supporting documentation in your response to Interrogatory No. 179, including any revised POD No. 37 Excel documents and revised FERC Form 1 documents.

Response:

Tampa Electric's non-confidential electronic documents responsive to this request will be served by posting on the SharePoint in the folder entitled "POD_11_138."

139. **2021-2023 Other Affiliate Allocations to TECO in POD No. 37 Format.** TECO's Please provide copies of all detailed information and related supporting documentation in your response to Interrogatory No. 180, including any documents similar to POD No. 37 that shows expenses allocated from all other affiliates to TECO for years 2021 to 2023.

Response:

The company does not have responsive documents for this request.

140. **Explain Changes in Emera Allocations**. Please provide copies of all detailed information and related supporting documentation, including supporting information addressing the changes in the amount and percent of expenses allocated from Emera to TECO and all affiliates from 2021 to 2023 in your response to Interrogatory No. 181.

PUBLIC INTERROGATORY NO. 179

INTERROGATORY NO. 61

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S SECOND SET OF INTERROGATORIES
INTERROGATORY NO. 61
BATES PAGE(S): 18144 - 18146
APRIL 22, 2024

61. **Top Down Allocation of Affiliate Costs to TECO**. Please address the following regarding the allocation of Emera and affiliate expenses and capitalized costs to TECO for the calendar years 2019 to 2023 (and estimated amounts for 2024 and this rate case proceeding) using a top down approach (starting with Emera/parent company costs and showing the allocated costs through all intermediate companies (service companies) to the final allocation to TECO):

a. First, using a working Excel spreadsheet if possible, please provide a side-by-side comparison for each of the calendar years 2019 to 2023 (and estimated/budgeted amounts for 2024) of the amount of Emera expenses and capital costs (provide these amounts separately) that are subject to allocation/assignment to each service company and all affiliates. Please show these separate allocated/assigned expense and capital costs by:

i. functional area/group (Corporate, Human Resources, Tax, Legal, etc.), and also by:
ii. type of expense (payroll, insurance, rent, outside services, etc.) and capital cost (each type of capital asset) included in each of the functional areas/groups in (i) above.

b. Regarding (a) above, if possible, reconcile the amount of Emera costs subject to allocation to the actual types of Emera expenses shown at Emera consolidated Annual Reports (for periods 2019 to 2023) and explain the reasons for all differences between Emera allocated expenses and Emera expenses at the Annual Reports.

c. Second, using a working Excel spreadsheet if possible, please provide a side-by-side comparison for each of the calendar years 2019 to 2023 (and estimated/budgeted amounts for 2024) of the amount of Emera expenses and capital costs (provide these amounts separately) allocated/assigned to each Service Company prior to allocation to each specific affiliate (and if applicable, explain why more than one Service Company is used). Please show each of the Service Company allocated/assigned expense and capital costs by:

i. functional area/group (Corporate, Human Resources, Tax, Legal, etc.), and also by:

ii. type of expense (payroll, insurance, rent, outside services, etc.) and capital cost (each type of capital asset) included in each of the functional areas/groups in (i) above.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 61
BATES PAGE(S): 18144 - 18146
APRIL 22, 2024**

d. Regarding (c) above, explain each type of allocation method, and provide the specific allocation factor percent (numerator divided by denominator), used to allocate each type of pooled cost (or cost by functional area/group) from Emera to each of the Service Companies. Provide all underlying calculations and supporting documentation for the numerator and denominator of each allocation factor for each of the periods 2019 to 2023 (and estimated/budgeted for 2024).

e. Third, using a working Excel spreadsheet if possible, please provide a side-by-side comparison for each of the calendar years 2019 to 2023 (and estimated/budgeted amounts for 2024) of the amount of Service Company expenses and capital costs (provide these amounts separately) allocated/assigned to TECO and each affiliate (or provide this information for allocations directly from Emera if intermediary Service Companies are not used).

f. Regarding (e) above, for TECO only (for actual 2019 to 2023, and estimated/budgeted 2024), show the amount of Service Company expense and capital costs allocated/assigned to TECO by detailed accounts below:

    i. functional area/group (Corporate, Human Resources, Tax, Legal, etc.), and also by:

    ii. type of expense (payroll, insurance, rent, outside services, etc.) and capital cost (each type of capital asset) included in each of the functional areas/groups in (i) above.

g. Regarding (e) above, explain each type of allocation method, and provide the specific allocation factor percent (numerator divided by denominator), used to allocate each type of pooled cost (or cost by functional area/group) from the Service Companies to TECO and each affiliate. Provide all underlying calculations and supporting documentation for the numerator and denominator of each allocation factor for each of the periods 2019 to 2023 (and estimated/budgeted for 2024).

h. Regarding (d) and (g) above, if applicable, explain why different allocation methods are used to allocate affiliate costs from Emera to the Service Companies, compared to the allocation methods used to allocate affiliate costs from the Service Companies to TECO and each affiliate.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 61
BATES PAGE(S): 18144 - 18146
APRIL 22, 2024**

i. Regarding (d) and (g) above, if applicable, explain if and why the Company uses different allocation methods for allocating costs from Emera (or allocating costs from Service Companies) to regulated utilities versus unregulated operations.

j. Explain why each of the allocation methods identified in (d) and (g) above are reasonable to use for each of the types of pooled costs (or the functional area/group costs that are subject to allocation). Explain the correlation between the numerator/denominator inputs of the allocation factors and how these act to drive each of these specific costs.

k. For each of the periods 2019 to 2024, explain when new or revised allocation methods or allocation factors were introduced and explain why it was reasonable to make these changes to allocation methods/factors.

l. Explain and cite to other companies that use similar or the same cost allocation methods used by Emera in allocating costs to Service Companies and affiliates.

Answer:

In addition to its general objections, which are incorporated herein by reference, Tampa Electric objects to this interrogatory on grounds that it is overbroad; burdensome; presumes facts about the way affiliate costs are charged and allocated to and from Tampa Electric that are inconsistent with the approach used by Emera, its subsidiaries, and Tampa Electric; and seeks information that is beyond the scope of discovery in this case. Notwithstanding these objections, Tampa Electric has consulted with OPC and its consultant, has provided preliminary information responsive to this interrogatory before the prescribed answer date, and is continuing to work cooperatively and in good faith with OPC and its consultant to provide a reasonable and responsive answer. Please see Tampa Electric's confidential response to OPC's Second Request for Production of Documents, No. 37.

CONFIDENTIAL POD NO. 37

a. Provide a copy of the related "Engagement Letter" for each of these Reports for each of the periods 2019 to 2024 that address, or impact costs allocated/assigned to TECO.

b. For each auditor/CPA Report that address costs allocated/assigned to TECO for the periods 2019 to 2024, provide that portion of the Report (or related workpapers) that show the amount of affiliate expenses and capital costs allocated/assigned to TECO for each period by functional area/group (Corporate, Human Resources, Tax, Legal, etc.) or type of expense (payroll, insurance, rent, outside services, etc.) included in each of the functional areas/groups.

Response:

The company has no responsive documents to this request. As explained in the company's answer to OPC's Second Set of Interrogatories, No. 59, no independent audit was performed.

36. Please provide a copy of their curriculum vitae for the names of all witnesses in the current TECO rate case that address specific issues related to CAM and costs allocated/assigned to TECO from Emera and all affiliates, and provide an actual PDF copy of their testimony that cannot be provided with a citation and link to their testimony addressing these issues in other rate case/regulatory proceedings in the most recent 5-year period.

Response:

Please see Tampa Electric's answer to OPC's Second Set of Interrogatories, No. 60 which provides information related to the testimony of the witnesses that are the subject of this request. There are no responsive curriculum vitae to provide.

37. Please provide copies of any documentation that supports the rationale, calculations and conclusions for your responses to Interrogatory No. 61.

Response:

In addition to its general objections, which are incorporated herein by reference, Tampa Electric objects to this request on grounds that it relates to an interrogatory that is overbroad; burdensome; presumes facts about the way affiliate costs are charged and allocated to and from Tampa Electric that are inconsistent with the approach used by Emera, its subsidiaries, and Tampa Electric; and seeks information that is beyond the scope of discovery in this case. Notwithstanding these objections, Tampa Electric has consulted with OPC and its consultant, has provided preliminary information responsive to Interrogatory No. 61 before the prescribed answer date, has posted confidential documents

Shared Service Costs - Summary by Cost Center

Billing November 2022 Charges

Emera

	Emera Inc. Total Costs to be Allocated	Nova Scotia Power NSP 001	NSPML NSP Maritime Link 080	Emera Corporate: Emera Holdco 009, Terminal Road 654, Emera US Holding Inc. 390, Grand HVAC 415; Pipelines: Scotia Power 025, NSP Pipeline 023	Brunswick Pipeline 350	Emera Energy: Emera Energy (Trading Company) 012, Emera Energy Generation II 396, Sub 1 / Bear Swamp 017, Brooklyn Power 062	Caribbean: Barbados Light & Power 853	Grand Bahamas (GBPC) 851	Emera Utility Services (Bahamas) Limited (EUSB) 125, DOMLEC 862, ECI 033, Emera Caribbean Holdings Limited 858; Emera Reinsurance (ERL) 389; Emera Technologies Ltd. (ETL) 410; TECO Partners (TPI) 233	TSI 202	Tampa Electric 221	People's Gas 231	New Mexico Gas 212	Total
Allegro	[redacted]	26,084	-	[redacted]	-	[redacted]	-	-	[redacted]	-	-	-	-	[redacted]
Allegro - Overhead		-	-		-		-	-		-	-	-	-	
Audit Services		58,761	95		-		-	-		-	-	-	-	
Audit Services - Overhead		27,783	-		-		-	-		-	-	-	-	
Audit Services, Sox/NI5		29,927	-		-		-	-		-	-	-	-	
Audit Services, Sox/NI5 - Overhead		13,403	-		-		-	-		-	-	-	-	
Communications		2,413	-		-		-	-		2,413	-	-	-	
Communications - Overhead		-	-		-		-	-		-	-	-	-	
Corporate Insurance		3,313	85		315		2,546	2,180		-	-	-	-	
Corporate Insurance - Overhead		1,134	49		107		865	740		-	-	-	-	
Corporate Secretary		1,289	1,719		430		430	430		-	-	-	859	
Corporate Secretary - Overhead		1	700		282		93	199		-	-	-	525	
Corporate Secretary - Annual General Meeting		(9,369)	-		-		-	-		-	(9,369)	-	-	
Corporate Secretary - Annual General Meeting - Overhead		-	-		-		-	-		-	-	-	-	
Corporate Tax Services		45,197	7,750		307		-	(1)		(6,317)	-	-	-	
Corporate Tax Services - Overhead		27,972	1,940		223		-	(0)		(3,536)	-	-	-	
Director of Safety		34,246	410		212		6,100	2,989		-	39,101	10,636	10,439	
Director of Safety - Overhead		6,255	75		39		1,114	546		-	7,142	1,943	1,907	
Total Rewards		11,526	163		76		2,199	1,099		-	13,754	3,462	3,794	
Total Rewards - Overhead		6,119	86		40		1,160	580		-	7,253	1,825	2,001	
Total Rewards - Canadian		125,886	1,786		846		-	-		-	-	-	-	
Total Rewards - Canadian - Overhead		12,966	175		92		-	-		-	-	-	-	
Enterprise Risk Management - Credit		2,371	-		-		-	-		-	-	-	-	
Enterprise Risk Management - Credit - Overhead		1,445	-		-		-	-		-	-	-	-	
Enterprise Risk Management - Risk		8,049	-		-		-	-		-	-	-	-	
Enterprise Risk Management - Risk - Overhead		5,331	-		-		-	-		-	-	-	-	
Environmental Policy		26,048	279		120		3,435	1,683		-	22,017	5,989	5,878	
Environmental Policy - Overhead		9,874	102		32		906	444		-	5,809	1,580	1,551	
Total Rewards - Health		8,425	784		407		1,501	735		2,133	7,486	2,617	2,568	
Total Rewards - Health - Overhead		3,127	37		19		557	273		792	2,779	971	953	
Human Resources		10,381	124		64		1,849	906		1,682	10,171	3,224	3,164	
Human Resources - Overhead		6,255	75		39		1,114	546		1,014	6,128	1,943	1,907	
Investor Relations		21,729	-		101		810	-		-	21,830	2,403	1,036	
Investor Relations - Overhead		4,969	-		23		185	-		-	4,992	550	237	
Office of the CDO		33,289	452		277		4,302	2,516		53,651	-	13,472	12,378	
Office of the CDO - Overhead		8,010	103		63		984	576		12,274	-	3,082	2,832	
Talent Management		18,545	222		115		3,303	1,619		-	-	-	-	
Talent Management - Overhead		10,494	126		65		1,869	916		-	-	-	-	
Payroll		18,159	321		163		-	-		-	-	-	-	
Payroll - Overhead		16,737	296		143		-	-		-	-	-	-	
Human Resource Operations		-	4,732		2,454		-	-		-	-	-	-	
Human Resource Operations - Overhead		-	2,872		1,489		-	-		-	-	-	-	
Talent Management AA		17,804	160		83		2,376	1,164		-	15,232	4,143	4,067	
Talent Management AA - Overhead		3,114	37		19		555	272		-	3,555	967	949	
Treasury		42,550	-		12		-	409		35,268	-	-	247	
Treasury - Overhead		17,647	-		4		-	161		14,222	-	-	78	
VP Compliance and Risk		28,538	341		177		5,083	2,491		5,477	27,107	8,863	8,699	
VP Compliance and Risk - Overhead		5,410	11		34		928	685		1,041	5,153	1,751	1,685	
Audit Services US and CAR		-	-		-		6,753	7,353		-	6,181	(235)	2,875	
Audit Services US and CAR - Overhead		-	-		-		1,333	1,464		-	2,098	891	1,055	
Ethics		5,251	63		33		935	458		-	-	-	-	
Ethics - Overhead		2,626	31		16		468	229		-	-	-	-	
Chief Operations Office		-	-		-		7,843	-		-	1,307	1,307	-	
Chief Operations Office - Overhead		-	-		-		4,235	-		-	706	706	-	
Board Allocations		28,333	2,737		5,000		3,358	2,763		-	18,882	3,868	11,917	
Chief Legal Office		-	-		1,115		1,115	1,115		-	-	-	-	
Chief Legal Office - Overhead		-	-		613		613	613		-	-	-	-	
Total Cost Center Cost		598,745	22,223		12,307		53,937	29,910		94,307	173,698	59,751	67,921	
Total Corporate Overhead		190,671	6,715		3,343		16,979	8,244		25,807	45,615	16,209	15,679	
Total														

Shared Service Costs - Summary by Cost Center

	Emera Inc.	Nova Scotia Power	NSPML	Emera Corporate			Pipelines			Emera Energy				Caribbean														
	Total Costs to be Allocated	NSP	NSP Maritime Link	Emera Holdco	Terminal Road	Emera US Holding Inc.	Scotia Power	NSP Pipeline	Brunswick Pipeline	(Trading Company)	Emera Energy Generation II	Sub 1 / Bear Swamp	Brooklyn Power	Barbados Light & Power	Grand Bahamas (GBPC)	Services (Bahamas) Limited	DOMLEC	ECI	Caribbean Holdings	Reinsurance (ERL)	Technologies Ltd. (ETL)	TECO Partners (TPI)	TSI	Tampa Electric	People's Gas	New Mexico Gas	Total	
		001	080	009	654	390	025	023	350	012	396	017	062	853	851	125	862	033	858	389	410	233	202	221	231	212		
Allegro	[redacted]	294,621	403	[redacted]					-	[redacted]				-	-	[redacted]							-	-	-	-	[redacted]	-
Allegro - Overhead	[redacted]	2,266	997	[redacted]					-	[redacted]				-	-	[redacted]							-	-	-	-	[redacted]	-
Audit Services	[redacted]	458,471	(18,685)	[redacted]					(50,464)	[redacted]				43,005	161,344	[redacted]							105,069	12,659	10,223	116,983	[redacted]	-
Audit Services - Overhead	[redacted]	223,555	4,188	[redacted]					2,661	[redacted]				22,002	89,486	[redacted]							71,517	4,802	5,644	65,178	[redacted]	-
Audit Services, Sox/NI5	[redacted]	297,907	-	[redacted]					-	[redacted]				-	-	[redacted]							-	-	-	-	[redacted]	-
Audit Services, Sox/NI5 - Overhead	[redacted]	187,383	-	[redacted]					-	[redacted]				-	-	[redacted]							-	-	-	-	[redacted]	-
Chief Information Officer	[redacted]	50,706	1,030	[redacted]					429	[redacted]				1,580	-	[redacted]							64,548	55,219	4,325	5,163	[redacted]	-
Chief Information Officer - Overhead	[redacted]	15,675	318	[redacted]					132	[redacted]				485	-	[redacted]							27,278	10,208	984	1,175	[redacted]	-
Communications	[redacted]	61,044	-	[redacted]					-	[redacted]				-	-	[redacted]							61,044	-	-	-	[redacted]	-
Communications - Overhead	[redacted]	-	-	[redacted]					-	[redacted]				-	-	[redacted]							-	-	-	-	[redacted]	-
Corporate Insurance	[redacted]	45,404	15,292	[redacted]					2,720	[redacted]				33,737	26,651	[redacted]							-	-	-	-	[redacted]	-
Corporate Insurance - Overhead	[redacted]	26,290	8,706	[redacted]					1,377	[redacted]				17,019	13,438	[redacted]							-	-	-	-	[redacted]	-
Corporate Secretary	[redacted]	13,753	15,297	[redacted]					14,437	[redacted]				1,767	1,986	[redacted]							9,003	787	698	3,675	[redacted]	-
Corporate Secretary - Overhead	[redacted]	8,211	7,916	[redacted]					8,290	[redacted]				1,028	1,156	[redacted]							5,204	442	433	2,123	[redacted]	-
Corporate Secretary - Annual General Meeting	[redacted]	228,315	-	[redacted]					-	[redacted]				-	-	[redacted]							-	228,315	-	-	[redacted]	-
Corporate Secretary - Annual General Meeting - Overhead	[redacted]	-	-	[redacted]					-	[redacted]				-	-	[redacted]							-	-	-	-	[redacted]	-
Corporate Tax Services	[redacted]	484,893	90,360	[redacted]					14,577	[redacted]				-	89	[redacted]							7,171	-	-	-	[redacted]	-
Corporate Tax Services - Overhead	[redacted]	300,816	63,912	[redacted]					8,691	[redacted]				-	54	[redacted]							4,345	-	-	-	[redacted]	-
Director of Safety	[redacted]	439,356	9,638	[redacted]					2,958	[redacted]				84,021	41,067	[redacted]							-	527,335	133,012	145,822	[redacted]	-
Director of Safety - Overhead	[redacted]	122,047	3,889	[redacted]					816	[redacted]				23,169	11,286	[redacted]							-	145,274	36,669	40,216	[redacted]	-
Total Rewards	[redacted]	241,583	3,367	[redacted]					1,593	[redacted]				19,073	9,544	[redacted]							-	119,680	30,084	32,933	[redacted]	-
Total Rewards - Overhead	[redacted]	135,356	1,870	[redacted]					875	[redacted]				17,342	8,631	[redacted]							-	108,561	27,314	29,908	[redacted]	-
Total Rewards - Canadian	[redacted]	585,764	8,307	[redacted]					3,900	[redacted]				813	394	[redacted]							-	5,082	1,279	1,397	[redacted]	-
Total Rewards - Canadian - Overhead	[redacted]	86,713	1,192	[redacted]					562	[redacted]				486	236	[redacted]							-	3,037	764	835	[redacted]	-
Enterprise Risk Management - Credit	[redacted]	84,306	1,317	[redacted]					-	[redacted]				-	-	[redacted]							-	72,432	-	-	[redacted]	-
Enterprise Risk Management - Credit - Overhead	[redacted]	40,260	1,430	[redacted]					-	[redacted]				-	-	[redacted]							-	2,636	-	-	[redacted]	-
Enterprise Risk Management - Risk	[redacted]	112,988	71	[redacted]					-	[redacted]				-	-	[redacted]							-	-	-	-	[redacted]	-
Enterprise Risk Management - Risk - Overhead	[redacted]	60,457	47	[redacted]					-	[redacted]				-	-	[redacted]							-	-	-	-	[redacted]	-
Environmental Policy	[redacted]	113,190	3,266	[redacted]					969	[redacted]				24,472	11,874	[redacted]							-	143,891	36,387	39,980	[redacted]	-
Environmental Policy - Overhead	[redacted]	69,623	2,458	[redacted]					589	[redacted]				14,569	7,052	[redacted]							-	84,770	21,440	23,558	[redacted]	-
Total Rewards - Health	[redacted]	52,120	2,813	[redacted]					1,240	[redacted]				9,467	4,696	[redacted]							13,027	45,720	14,852	16,340	[redacted]	-
Total Rewards - Health - Overhead	[redacted]	23,965	415	[redacted]					142	[redacted]				4,047	1,979	[redacted]							5,618	19,717	6,397	7,021	[redacted]	-
Human Resources	[redacted]	146,233	2,079	[redacted]					873	[redacted]				24,775	11,998	[redacted]							22,103	133,628	39,266	42,992	[redacted]	-
Human Resources - Overhead	[redacted]	82,747	1,291	[redacted]					478	[redacted]				13,528	6,543	[redacted]							12,048	72,835	21,432	23,496	[redacted]	-
HR Strategies Group	[redacted]	118,929	1,735	[redacted]					784	[redacted]				22,387	11,193	[redacted]							-	12,504	3,118	3,386	[redacted]	-
HR Strategies Group- Overhead	[redacted]	4,805	70	[redacted]					32	[redacted]				905	452	[redacted]							-	5,796	1,445	1,569	[redacted]	-
Investor Relations	[redacted]	165,643	-	[redacted]					-	[redacted]				-	-	[redacted]							-	166,016	-	-	[redacted]	-
Investor Relations - Overhead	[redacted]	64,403	-	[redacted]					-	[redacted]				-	-	[redacted]							-	63,391	-	-	[redacted]	-
Organizational Development	[redacted]	256,609	3,582	[redacted]					1,753	[redacted]				50,995	24,600	[redacted]							-	129,739	32,528	35,450	[redacted]	-
Organizational Development - Overhead	[redacted]	43,178	591	[redacted]					286	[redacted]				8,299	4,027	[redacted]							-	-	-	-	[redacted]	-
Office of the CDO	[redacted]	428,266	8,652	[redacted]					3,609	[redacted]				38,776	21,566	[redacted]							1,172,499	-	-	-	[redacted]	-
Office of the CDO - Overhead	[redacted]	54,834	1,414	[redacted]					457	[redacted]				3,886	1,863	[redacted]							149,719	-	-	56	[redacted]	-
Talent Management	[redacted]	434,240	6,229	[redacted]					2,991	[redacted]				83,658	40,627	[redacted]							-	90,586	22,905	25,174	[redacted]	-
Talent Management - Overhead	[redacted]	208,811	3,002	[redacted]					1,430	[redacted]				40,210	19,573	[redacted]							-	-	-	-	[redacted]	-
Payroll	[redacted]	254,255	8,370	[redacted]					3,282	[redacted]				-	-	[redacted]							-	-	-	-	[redacted]	-
Payroll - Overhead	[redacted]	203,039	8,657	[redacted]					2,759	[redacted]				-	-	[redacted]							-	-	-	-	[redacted]	-
Human Resource Operations	[redacted]	-	31,857	[redacted]					15,155	[redacted]				-	-	[redacted]							-	-	-	-	[redacted]	-
Human Resource Operations - Overhead	[redacted]	-	22,632	[redacted]					10,771	[redacted]				-	-	[redacted]							-	-	-	-	[redacted]	-
Talent Acquisition	[redacted]	33,709	440	[redacted]					176	[redacted]				-	-	[redacted]							-	-	-	-	[redacted]	-
Talent Acquisition - Overhead	[redacted]	16,059	207	[redacted]					83	[redacted]				-	-	[redacted]							-	-	-	-	[redacted]	-
Treasury	[redacted]	344,340	11,424	[redacted]					5,181	[redacted]				1,864	857	[redacted]							92,201	4,279	-	3,632	[redacted]	-
Treasury - Overhead	[redacted]	170,550	5,550	[redacted]					2,327	[redacted]				852	379	[redacted]							42,511	1,960	-	1,665	[redacted]	-
VP Compliance and Risk	[redacted]	180,954	2,594	[redacted]					1,239	[redacted]				34,927	16,999	[redacted]							37,431	181,741	55,382	60,812	[redacted]	-
VP Compliance and Risk - Overhead	[redacted]	34,232	1,485	[redacted]					468	[redacted]				6,590	3,702	[redacted]							7,421	36,595	11,181	12,653	[redacted]	-
Chief Operations Office	[redacted]	-	11,832	[redacted]					-	[redacted]				77,462	-	[redacted]							12,910	-	12,910	-	[redacted]	-
Chief Operations Office - Overhead	[redacted]	-	5,798	[redacted]					-	[redacted]				41,878	-	[redacted]							6,980	-	6,980	-	[redacted]	-
Security	[redacted]	71,172	1,488	[redacted]					602	[redacted]				2,216	-	[redacted]							130,773	15,831	15,825	18,889	[redacted]	
Security - Overhead	[redacted]	8,098	169	[redacted]					68	[redacted]				252	-	[redacted]							14,167	3,226	1,477	1,762	[redacted]	
Board Allocations	[redacted]	428,542	38,673	[redacted]					60,000	[redacted]				116,698	67,663	[redacted]							-	242,625	42,330	149,500	[redacted]	-
Board Allocations - Overhead	[redacted]	-	-	[redacted]					-	[redacted]				-	-	[redacted]							-	-	-	-	[redacted]	-
Chief Legal Office	[redacted]	-	914	[redacted]					12,836	[redacted]				10,464	10,464	[redacted]							-	-	-	-	[redacted]	-
Chief Legal Office - Overhead	[redacted]	-	503	[redacted]					5,755	[redacted]				5,755	5,755	[redacted]							-	-	-	-	[redacted]	-
Total Cost Center Cost	[redacted]	6,427,313	262,347	[redacted]					100,838	[redacted]				682,156	463,614	[redacted]							1,727,780	2,188,068	455,125	702,128	[redacted]	-
Total Corporate Overhead	[redacted]	2,193,375	148,708	[redacted]					49,050	[redacted]				222,302	175,611	[redacted]							346,806	563,248	142,161	211,216	[redacted]	-
Total	[redacted]			[redacted]						[redacted]						[redacted]											[redacted]	-
	[redacted]	-	-	[redacted]					-	[redacted]				-	-	[redacted]							-	-	-	-	[redacted]	
Check to Bill tabs	[redacted]	8,620,687.60	411,055.07	[redacted]					149,888.68	[redacted]				904,458.06	639,224.31	[redacted]							2,074,586.36	2,751,315.79	597,285.33	913,343.78	[redacted]	
Variance	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

Shared Service Costs - Summary by Cost Center

		7	8	4	5	6		9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	
	Emera Inc.	Nova Scotia Power	NSPML	Emera Corporate				Pipelines			Emera Energy				Caribbean													
	Total Costs to be Allocated	NSP 001	NSP Maritime Link 080	Emera Holdco 009	Terminal Road 654	Emera US Holding Inc. 390	Grand HVAC 415	Scotia Power 025	NSP Pipeline 023	Brunswick Pipeline 350	Emera Energy (Trading Company) 012	Emera Energy Generation II 396	Sub 1 / Bear Swamp 017	Brooklyn Power 062	Barbados Light & Power 853	Grand Bahamas (GBPC) 851	Emera Utility Services (Bahamas) Limited (EUSB) 125	DOMLEC 862	ECI 033	Emera Caribbean Holdings Limited 858	Emera Reinsurance (ERL) 389	Emera Technologies Ltd. (ETL) 410	TECO Partners (TPI) 233	TSI 202	Tampa Electric 221	People's Gas 231	New Mexico Gas 212	Total
Allegro	[redacted]	275,109	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Allegro - Overhead	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Audit Services	[redacted]	774,023	518	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	251	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Audit Services - Overhead	[redacted]	362,590	221	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	111	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Audit Services, Sox/NI5	[redacted]	171,287	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Audit Services, Sox/NI5 - Overhead	[redacted]	124,790	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Communications	[redacted]	107,333	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	84,491	22,842	-	-	[redacted]
Communications - Overhead	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Corporate Insurance	[redacted]	38,207	14,336	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	2,860	[redacted]	[redacted]	[redacted]	[redacted]	28,421	25,326	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Corporate Insurance - Overhead	[redacted]	17,666	6,122	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	1,200	[redacted]	[redacted]	[redacted]	[redacted]	11,910	10,611	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Corporate Secretary	[redacted]	39,116	38,199	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	17,537	[redacted]	[redacted]	[redacted]	[redacted]	4,447	2,721	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	5,626	2,593	14,719	5,146	[redacted]
Corporate Secretary - Overhead	[redacted]	7,546	13,561	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	6,508	[redacted]	[redacted]	[redacted]	[redacted]	1,641	972	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	1,963	898	5,030	1,791	[redacted]
Corporate Secretary - Annual General Meeting	[redacted]	212,212	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	212,212	-	-	[redacted]
Corporate Secretary - Annual General Meeting - Overhead	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Corporate Tax Services	[redacted]	475,063	52,827	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	27,539	[redacted]	[redacted]	[redacted]	[redacted]	85	59	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	4,117	3,828	300	-	[redacted]
Corporate Tax Services - Overhead	[redacted]	282,447	32,348	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	14,463	[redacted]	[redacted]	[redacted]	[redacted]	(2,175)	(1,118)	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	2,132	(12,375)	(3,798)	(3,844)	[redacted]
Director of Safety	[redacted]	488,169	6,171	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	3,505	[redacted]	[redacted]	[redacted]	[redacted]	90,972	46,136	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	564,809	159,317	151,965	[redacted]
Director of Safety - Overhead	[redacted]	90,591	1,145	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	651	[redacted]	[redacted]	[redacted]	[redacted]	16,900	8,574	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	109,118	30,813	29,378	[redacted]
Total Rewards	[redacted]	172,708	2,149	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	1,222	[redacted]	[redacted]	[redacted]	[redacted]	31,640	16,082	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	203,896	57,567	55,024	[redacted]
Total Rewards - Overhead	[redacted]	57,872	698	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	392	[redacted]	[redacted]	[redacted]	[redacted]	10,224	5,182	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	66,020	18,465	17,793	[redacted]
Total Rewards - Canadian	[redacted]	623,645	7,983	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	4,448	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Total Rewards - Canadian - Overhead	[redacted]	158,204	1,988	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	1,117	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Enterprise Risk Management - Credit	[redacted]	55,541	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	61,653	2,106	602	[redacted]
Enterprise Risk Management - Credit - Overhead	[redacted]	25,385	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	35	[redacted]
Enterprise Risk Management - Risk	[redacted]	106,439	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Enterprise Risk Management - Risk - Overhead	[redacted]	61,251	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Environmental Policy	[redacted]	203,012	7,234	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	1,208	[redacted]	[redacted]	[redacted]	[redacted]	31,394	15,902	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	202,470	57,439	54,619	[redacted]
Environmental Policy - Overhead	[redacted]	96,065	4,734	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	479	[redacted]	[redacted]	[redacted]	[redacted]	12,458	6,416	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	80,498	22,717	21,679	[redacted]
Total Rewards - Health	[redacted]	60,559	3,007	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	1,723	[redacted]	[redacted]	[redacted]	[redacted]	11,281	5,716	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	16,171	56,755	20,522	19,567	[redacted]
Total Rewards - Health - Overhead	[redacted]	32,331	409	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	232	[redacted]	[redacted]	[redacted]	[redacted]	6,012	3,052	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	8,632	30,297	10,925	10,444	[redacted]
Human Resources	[redacted]	146,988	1,799	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	1,022	[redacted]	[redacted]	[redacted]	[redacted]	26,522	13,453	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	24,370	147,333	48,354	46,145	[redacted]
Human Resources - Overhead	[redacted]	79,437	970	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	551	[redacted]	[redacted]	[redacted]	[redacted]	14,303	7,257	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	13,140	79,439	26,066	24,874	[redacted]
Investor Relations	[redacted]	241,853	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	1,125	[redacted]	[redacted]	[redacted]	[redacted]	9,013	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	242,817	26,730	11,523	[redacted]
Investor Relations - Overhead	[redacted]	69,136	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	322	[redacted]	[redacted]	[redacted]	[redacted]	2,578	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	69,458	7,646	3,296	[redacted]
Office of the CDO	[redacted]	439,883	6,011	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	3,196	[redacted]	[redacted]	[redacted]	[redacted]	57,958	39,563	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	737,656	312,530	98,300	92,811	[redacted]
Office of the CDO - Overhead	[redacted]	76,422	997	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	518	[redacted]	[redacted]	[redacted]	[redacted]	9,625	6,508	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	133,793	38,313	16,573	15,593	[redacted]
Talent Management	[redacted]	160,070	2,023	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	1,148	[redacted]	[redacted]	[redacted]	[redacted]	29,877	15,128	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Talent Management - Overhead	[redacted]	118,117	1,492	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	846	[redacted]	[redacted]	[redacted]	[redacted]	22,051	11,159	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Payroll	[redacted]	249,215	12,134	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	2,939	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Payroll - Overhead	[redacted]	181,005	11,482	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	2,237	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Human Resource Operations	[redacted]	65	55,039	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	31,236	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Human Resource Operations - Overhead	[redacted]	63	38,981	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	22,105	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Talent Management AA	[redacted]	318,364	4,035	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	2,288	[redacted]	[redacted]	[redacted]	[redacted]	59,389	30,156	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	384,066	107,795	102,942	[redacted]
Talent Management AA - Overhead	[redacted]	38,274	484	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	275	[redacted]	[redacted]	[redacted]	[redacted]	7,136	3,621	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	46,192	13,004	12,410	[redacted]
Treasury	[redacted]	424,170	1,102	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	1,507	[redacted]	[redacted]	[redacted]	[redacted]	2,544	4,757	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	43,794	23,800	288,457	67,826	[redacted]
Treasury - Overhead	[redacted]	159,006	367	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	479	[redacted]	[redacted]	[redacted]	[redacted]	807	1,737	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	13,996	7,657	91,499	23,359	[redacted]
VP Compliance and Risk	[redacted]	281,406	3,556	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	2,022	[redacted]	[redacted]	[redacted]	[redacted]	52,513	26,616	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	57,093	282,556	95,815	91,299	[redacted]
VP Compliance and Risk - Overhead	[redacted]	58,218	1,792	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	1,032	[redacted]	[redacted]	[redacted]	[redacted]	11,978	8,334	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	11,654	57,675	20,807	20,997	[redacted]
Audit Services US and CAR	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	[redacted]	[redacted]	[redacted]	[redacted]	14,696	20,618	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	336,157	7,374	4,869	[redacted]
Audit Services US and CAR - Overhead	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	[redacted]	[redacted]	[redacted]	[redacted]	4,621	6,472	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	105,394	2,378	1,556	[redacted]
Ethics	[redacted]	73,853	932	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	529	[redacted]	[redacted]	[redacted]	[redacted]	13,796	6,978	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Ethics - Overhead	[redacted]	32,877	415	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	236	[redacted]	[redacted]	[redacted]	[redacted]	6,139	3,109	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Business Transformation - AA	[redacted]	69,737	876	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	468	[redacted]	[redacted]	[redacted]	[redacted]	12,817	6,282	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	85,167	23,372	22,939	[redacted]
Business Transformation - AA - Overhead	[redacted]	45,269	573	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	323	[redacted]	[redacted]	[redacted]	[redacted]	8,423	4,257	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	54,716	15,324	14,693	[redacted]
Business Transformation - CA	[redacted]	539,419	6,831	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	3,966	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Business Transformation - CA - Overhead	[redacted]	84,809	1,073	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	622	[redacted]	[redacted]	[redacted]	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Chief Operations Office	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	[redacted]	[redacted]	[redacted]	[redacted]	7,843	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	1,307	1,307	-	[redacted]
Chief Operations Office - Overhead	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	[redacted]	[redacted]	[redacted]	[redacted]	4,235	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	706	706	-	[redacted]
Board Allocations	[redacted]	262,083	32,840	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	60,000	[redacted]	[redacted]	[redacted]	[redacted]	59,900	33,714	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	252,081	46,416	146,297	[redacted]
Chief Legal Office	[redacted]	12,338	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	13,378	[redacted]	[redacted]	[redacted]	[redacted]	13,578	13,578	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Chief Legal Office - Overhead	[redacted]	-	-	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	613	[redacted]	[redacted]	[redacted]	[redacted]	613	613	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	-	-	-	-	[redacted]
Total Cost Center Cost	[redacted]	7,021,867	259,603	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	185,118	[redacted]	[redacted]	[redacted]	[redacted]	558,684	322,787	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	973,318	3,398,872	1,055,890	873,573	[redacted]
Total Corporate Overhead	[redacted]	2,259,372	119,855	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	55,312	[redacted]	[redacted]	[redacted]	[redacted]	149,480	86,755	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	185,310	734,006	278,155	194,056	[redacted]
Total	[redacted]			[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]		[redacted]	[redacted]	[redacted]	[redacted]			[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]					[redacted]
check	[redacted]	0.00	0.00	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	0.00	[redacted]	[redacted]	[redacted]	[redacted]	(0.00)	0.00	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	0.00	(0.00)	0.00	0.00	[redacted]

CONFIDENTIAL INTERROGATORY NO. 179

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF INTERROGATORIES
INTERROGATORY NO. 179
BATES PAGE(S): 30614 - 30619
MAY 23, 2024

179. 2021 -2023 Emera Allocations to TECO (and Other Affiliates) Do Not Reconcile to FERC Form 1. TECO's Confidential response to OPC's Second Set of PODs No. 37 includes four Excel documents (BS 16844, 16845, 16846, and 16847) that show the amount of Shared Services expenses by Function (and Emera Total Corporate Overhead expense) allocated from Emera/Parent to all affiliates for calendar years 2021, 2022, 2023, and a summary 2021-2023 (TECO's response to related OPC's Second set of INTs No. 61 is not deemed Confidential). Allocations to TECO – POD No. 37 shows total Emera Shared Services/Corporate Overheads allocated to TECO of [redacted] (including Corporate Overhead of [redacted]) for 2023, [redacted] (including Corporate Overhead of [redacted]) for 2022, and [redacted] (including Corporate Overhead of [redacted]) for 2021, but this does not reconcile to allocations from Emera to TECO at the FERC Form 1 diversification reports (that are not confidential) which show related allocations (that exclude gas purchases) from Emera to TECO of [redacted] ([redacted] of non-labor Corporate Support Services) for 2023, [redacted] ([redacted] of non-labor Corporate Support Services) for 2022. Please address the following regarding the allocations from Emera to TECO and affiliates for 2023:

a. Per the above information, explain and reconcile the allocated costs from Emera to TECO shown at the POD No. 37 Excel document to the similar information shown at FERC Form 1 diversification reports for calendar years 2021, 2022, and 2023, and provide all supporting and calculations, and show labor and non-labor allocated amounts separately by Function (exclude or separately identify all gas purchase amounts in the transactions). Explain which document (POD No. 37 or FERC Form 1 diversification reports) is correct regarding allocated amounts from Emera to TECO for calendar years 2021, 2022, and 2023, and explain the purpose of the other document if it does not show correct allocated amounts from Emera to TECO.

b. If Emera allocations to TECO at POD No. 37 are not correct for years 2021, 2022, and 2023, then provide a corrected POD No. 37 Excel spreadsheet in the same format showing the correct allocated amounts by Function from Emera to TECO and all affiliates for years 2021, 2022, and 2023 (and also provide the correct total amount of Emera expenses allocated to affiliates by Function, per the first column of POD No. 37).

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF INTERROGATORIES
INTERROGATORY NO. 179
BATES PAGE(S): 30614 - 30619
MAY 23, 2024

c. Regarding (a) and (b) above, compare the POD No. 37 information showing Emera allocations to PGS and NMG for 2021, 2022, and 2023 to the similar information in the FERC Form 1 affiliate diversification reports for PGS and NMG, and explain and reconcile the differences. Explain which document shows the correct allocated amounts from Emera for years 2021, 2022, and 2023 and explain the purpose of the other document if it does not show correct allocated amounts from Emera.

d. Per (a) above, please reconcile and identify the correct amount of allocated expenses from Emera to TECO for years 2021, 2022, and 2023, and identify the related amounts recorded on TECO's books by expense account number (and account description).

ANSWER:

In addition to the answer below, please see Tampa Electric's response to "OPC Clarification Questions for TECO TEAMs Call – May 16, 2024".

a. The Emera Allocations listed in POD No. 37 Excel files for 2021, 2022, and 2023 are all contained in the charges reported in the Tampa Electric FERC Form 1 Diversification Pages for those years – on the Page 457C line item titled "Emera, Inc. - Corporate Support Services & Monthly Allocations". The dollars on POD No. 37 will not directly match the amounts on FERC Form 1 Diversification Pages for the following two reasons:

   1. The amounts provided in Tampa Electric's response to OPC's Second Request for Production of Documents are in Canadian (CAD) currency. Tampa Electric converts all CAD currency to USD, and then records the charges in USD. Our FERC Form 1 is filed in USD as well. Also when Tampa Electric performs the conversion, we use the average conversion rate from the current month instead of an average annual conversion rate.
   2. Tampa Electric's response to OPC's Second Request for Production of Documents No. 37 reflects costs that Emera describes as monthly allocations. Emera describes costs related to Emera Corporate

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF
INTERROGATORIES
INTERROGATORY NO. 179
BATES PAGE(S): 30614 - 30619
MAY 23, 2024**

Support Services, Pension Function, and External Financial Reporting & Compliance as direct costs. The executive compensation contained in the Emera Corporate Support Services costs are included in OPC's First Set of Interrogatories, No. 20. Since Emera does not describe Emera Corporate Support Services, Pension Function, and External Financial Reporting & Compliance costs as allocations.

To delineate the total Emera costs and to reconcile those Emera costs to the amounts presented in the FERC Form 1 Diversification Pages, the company is providing the chart below.

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF INTERROGATORIES
INTERROGATORY NO. 179
BATES PAGE(S): 30614 - 30619
MAY 23, 2024

1	**Reconciliation of CAD amounts between Emera schedules and Tampa Electric schedules**				
2					
3	**Emera Charges to Tampa Electric:**	**2023**	**2022**	**2021**	**2020**
4	Emera Allocations - SS (called "TSI Corp Support Allocation") - POD 37 (CAD)	1,158,627.66	1,757,750.68	2,074,586.29	1,062,361.38
5	Emera Allocations - TEC Non-SS (called "TEC Corp Support Allocation") - POD 37 (CAD)	4,132,878.19	2,995,235.26	2,751,315.77	2,664,620.12
6		**5,291,505.85**	**4,752,985.94**	**4,825,902.06**	**3,726,981.50**
7	Corporate Support Services - Direct Bill per Emera:				
8	Emera Corporate Services (called "TSI recoveries") - MMM	9,562,409.64	9,089,255.36	9,243,709.56	8,207,650.68
9	Pension Function (Labor, overhead and actuarial services)	233,656.84	207,890.08	151,678.00	129,208.11
10	External Financial Reporting & Compliance (Labor)	5,822.78	7,603.07	6,280.06	10,005.15
11		**9,801,889.26**	**9,304,748.51**	**9,401,667.62**	**8,346,863.94**
12					
13	Total Charges from Emera to Tampa Electric, Excluding Seconded Labor (CAD)	**15,093,395.11**	**14,057,734.45**	**14,227,569.68**	**12,073,845.44**
14					
15	**Tampa Electric Charges from Emera:**				
16	Tampa Electric Shared Service (CAD)	1,680,001.50	1,816,203.16	2,278,218.29	1,518,719.04
17	Tampa Electric (CAD)	3,517,384.53	2,936,782.40	2,641,083.93	1,956,334.04
18		**5,197,386.03**	**4,752,985.56**	**4,919,302.22**	**3,475,053.08**
19	Corporate Support Services - Direct Bill per Emera:				
20	Emera Corporate Services (called "TSI recoveries") - MMM	9,562,409.64	9,089,255.36	9,243,709.56	8,207,650.68
21	Pension Function (Labor, overhead and actuarial services)	233,656.84	207,890.08	151,678.00	129,208.11
22	External Financial Reporting & Compliance (Labor)	5,822.78	7,603.07	6,280.06	10,005.15
23		**9,801,889.26**	**9,304,748.51**	**9,401,667.62**	**8,346,863.94**
24					
25	Total Charges to Tampa Electric from Emera, Excluding Seconded Labor (CAD)	**14,999,275.29**	**14,057,734.07**	**14,320,969.84**	**11,821,917.02**
26					
27	Closeout Timing Difference (CAD)	94,119.82	0.38	(93,400.16)	251,928.42
28					
29					
30	**Reconciliation to amounts shown on FERC Form 1 Diversification Pages**				
31		**2023**	**2022**	**2021**	**2020**
32	Total Charges to Tampa Electric from Emera, Excluding Seconded Labor (CAD) - Line 25	14,999,275.29	14,057,734.07	14,320,969.84	11,821,917.02
33	Full-Year Average Currency Conversion Rate	1.3495	1.3017	1.2537	1.3412
34	Total Charges to Tampa Electric from Emera, Excluding Seconded Labor (Converted to USD)	11,114,690.84	10,799,519.14	11,422,963.90	8,814,432.61
35					
36	Impact of Accruals/Reversals (USD)	(16,404.67)	-	443,953.98	-
37					
38	Impact of using year-end average rate vs actual monthly conversion rate used (USD)	19,534.83	22,039.86	51,114.12	3,923.39
39					
40	FERC Form 1, Page 457 - Emera, Inc. : Corporate Support Services & Monthly Allocations (USD)	11,117,821	10,821,559	11,918,032	8,818,356

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF INTERROGATORIES
INTERROGATORY NO. 179
BATES PAGE(S): 30614 - 30619
MAY 23, 2024

The chart above is provided in Excel format with formulas intact in the company's response to OPC's Eleventh Request for Production of Documents No. 138 ("POD_11_138").

b. The data provided in Tampa Electric's response to OPC's Second Request for Production of Documents No. 37 is correct. As discussed in the answer to (a) above, there are charges that Emera does not describe as allocated costs but rather describes as direct costs. To delineate the total Emera costs and to reconcile those Emera costs to the amounts presented in the Tampa Electric FERC Form 1 Diversification Pages, the company is providing the chart in the answer to (a) above. In addition, the company is also providing – for the same purpose – the chart in Tampa Electric's Eleventh Request for Production of Documents, No. 140.

c. In addition to its general objections, which are incorporated herein by reference, Tampa Electric objects to this request on grounds that it is overbroad and unduly burdensome to the extent it requests the company to independently reconcile information in public filings made by PGS and NMG for which Tampa Electric has no involvement.

Notwithstanding the objection above, the company is providing the following clarification: As discussed in the answer to (a) above, the Emera Allocations listed in Tampa Electric's response to OPC's Second Request for Production of Documents No. 37 Excel files for 2021, 2022, and 2023 are all contained in charges that would be reported by US affiliates in regulatory filings. The dollars will not directly match the amounts on regulatory filings for the following two reasons:

1. The amounts provided in Tampa Electric's response to OPC's Second Request for Production of Documents are in Canadian (CAD) currency. US affiliates convert all CAD currency to USD, and then record the charges in USD. US regulatory filings are filed in USD as well. Also, when an affiliate performs a conversion, they would use the average conversion rate from the current month instead of an average annual conversion rate.

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF INTERROGATORIES
INTERROGATORY NO. 179
BATES PAGE(S): 30614 - 30619
MAY 23, 2024

2. Tampa Electric's response to OPC's Second Request for Production of Documents No. 37 reflects costs that Emera describes as monthly allocations. Emera describes costs related to Emera Corporate Support Services, Pension Function, and External Financial Reporting & Compliance as direct costs. Since Emera does not describe Emera Corporate Support Services, Pension Function, and External Financial Reporting & Compliance costs as allocations, these were not reflected.

   The data provided in Tampa Electric's response to OPC's Second Request for Production of Documents, No. 37 is correct. As discussed in the answer to (a) above, there are charges that Emera does not describe as allocated costs but rather describes as direct costs. To delineate the total Emera costs and to reconcile those Emera costs to the amounts that would be presented in regulatory filings, the company is providing the chart in response to OPC's Eleventh Request for Production of Documents, No 140.

d. Please see the answers to supbarts (a) and (b) above. Additionally, please see Tampa Electric's response to OPC's Eleventh Request for Production of Documents, Nos. 138 and 140 for files titled OPC Summary – POD 138.xlsx titled OPC POD_140_Emera Charges.xlsx, respectively. as Also, please see Tampa Electric's response to OPC's Ninth Request for Production of Documents, NO. 118 titled OPC_Affiliate_Purchases by FERC.xlsx.