



**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

**DOCKET NO. 20210034-EI
IN RE: PETITION FOR RATE INCREASE
BY TAMPA ELECTRIC COMPANY**

**DIRECT TESTIMONY AND EXHIBIT
OF
ARCHIBALD D. COLLINS**

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

PREPARED DIRECT TESTIMONY

OF

ARCHIBALD D. COLLINS

Q. Please state your name, address, occupation and employer.

A. My name is Archibald D. Collins. My business address is 702 N. Franklin Street, Tampa, Florida 33602. I am employed by Emera Inc. and am seconded to Tampa Electric Company ("Tampa Electric" or "company") as President and Chief Operating Officer and will become Chief Executive Officer on May 3, 2021.

Q. Please describe your duties and responsibilities in that position.

A. Today as President and Chief Operating Officer, I report to the Chief Executive Officer of Tampa Electric. I have overall responsibility for all aspects of the company including strategy development, operations of the company, safety, environment, customer experience, generation, transmission, distribution, construction, facility services and other shared services including Information Technology, Legal, Human Resources, Finance and

1 Procurement. All Tampa Electric Officers report to me, and
2 together we lead a total of approximately 2,400 team
3 members.
4

5 **Q.** Please provide a brief outline of your educational
6 background and business experience.
7

8 **A.** I graduated from St. Francis Xavier University with a
9 diploma in Engineering and from Dalhousie University with
10 a bachelor's degree in Chemical Engineering.
11

12 I have more than 30 years of experience in the energy
13 industry. Prior to becoming Chief Operating Officer of
14 Tampa Electric in 2018, and then President and Chief
15 Operating Officer of the company in 2021, I held the
16 position of President and Chief Executive Officer of Grand
17 Bahama Power Co. and President and Chief Operating Officer
18 of Emera Caribbean. In addition, I have served as Executive
19 Vice President of Commercial Operations with Emera Energy,
20 as Vice President of Operations at Emera Energy, and in
21 senior roles with Nova Scotia Power.
22

23 **Q.** What are the purposes of your direct testimony?
24

25 **A.** Tampa Electric is requesting that the Florida Public

1 Service Commission ("Commission") approve a \$294.9 million
2 increase in the company's retail base rates and to reduce
3 its miscellaneous service revenues by \$6.6 million. Our
4 filing also proposes Generation Base Rate Adjustments
5 ("GBRA") in 2023 and 2024, for approximately \$102.2 and
6 \$25.6 million, respectively. The purposes of my direct
7 testimony are to (1) describe Tampa Electric's key actions
8 since our last request for rate relief in 2013 and how they
9 have benefitted customers; (2) explain how our strategic
10 focus on our customers, cost control, and decarbonization,
11 all enabled by our employees, has positioned our company
12 to keep customer bills at about the same level they were
13 in 2013; (3) describe significant investments planned or
14 underway to meet customers' needs; and (4) summarize the
15 company's request for rate relief. I will also introduce
16 the other witnesses who have filed direct testimony in
17 support of the company's petition and briefly describe the
18 subject matter each witness will cover.

19
20 **Q.** Have you prepared an exhibit to support your direct
21 testimony?

22
23 **A.** Yes. Exhibit No. ADC-1, entitled "Exhibit of Archibald D.
24 Collins" was prepared under my direction and supervision.
25 The contents of my exhibit were derived from the business

1 records of the company and are true and correct to the best
2 of my information and belief. It consists of the four
3 documents:

4
5 Document No. 1 List of Tampa Electric Witnesses and
6 Purpose of their Direct Testimony

7 Document No. 2 List of Minimum Filing Requirement
8 Schedules Sponsored by Archibald D.
9 Collins

10 Document No. 3 CO₂ Emissions (Short Tons / Year)

11 Document No. 4 Generation Mix
12

13 **OVERVIEW OF TAMPA ELECTRIC**

14 **Q.** Please describe Tampa Electric.
15

16 **A.** Tampa Electric was incorporated in Florida in 1899 and was
17 reincorporated in 1949. Tampa Electric is a wholly owned
18 subsidiary of TECO Energy, Inc. ("TECO Energy") and became
19 a wholly owned subsidiary of Emera Inc. ("Emera") in 2016
20 when Emera purchased all common stock of TECO Energy, Inc.
21 Tampa Electric is an investor-owned utility regulated by
22 the Commission and the Federal Energy Regulatory
23 Commission.
24

25 Tampa Electric currently provides retail electric service

1 to approximately 800,000 customers over an approximate
2 2,000 square mile service territory within Hillsborough
3 and portions of Polk, Pasco, and Pinellas counties. We
4 serve these customers with approximately 2,400 employees
5 and the utility facilities described below. Most of our
6 team members work in the areas of Energy Supply, Electric
7 Delivery, and Customer Experience, along with others who
8 work in support areas like Information Technology,
9 Accounting and Finance, Human Resources, and Regulatory
10 Affairs.

11
12 The company maintains a diverse portfolio of generating
13 facilities with a net winter capacity of approximately
14 5,790 megawatts ("MW"). Tampa Electric operates three
15 electric generating stations that include fossil steam
16 units, combined cycle units, combustion turbine peaking
17 units, and an integrated gasification combined cycle unit.
18 These units are located at Big Bend Power Station, H.L.
19 Culbreath Bayside Power Station, and Polk Power Station.
20 As of January 1, 2021, the company operated 655 MW of solar
21 generation at 13 facilities located throughout its retail
22 service territory and 12.6 MW_{ac} capacity of battery storage.
23 For the full year 2020, these solar facilities provided
24 approximately 6.0 percent of the company's total energy
25 sales and represented 11.8 percent of the company's

1 installed generating capacity.

2
3 Tampa Electric's transmission system consists of nearly
4 1,350 circuit miles of overhead facilities, including
5 approximately 25,400 transmission poles and structures,
6 and approximately nine circuit miles of underground
7 facilities. The company's distribution system consists of
8 approximately 6,300 circuit miles of overhead facilities,
9 approximately 414,000 poles, and 5,500 circuit miles of
10 underground facilities. Our transmission and distribution
11 systems are connected through 216 substations throughout
12 its service territory.

13
14 **Q.** Please describe Emera.

15
16 **A.** Emera is a geographically diverse energy and services
17 company headquartered in Halifax, Nova Scotia, with
18 approximately \$31 billion CAD (Canadian dollars) in assets
19 and 2020 revenues of more than \$5.5 billion CAD. The
20 company primarily invests in regulated electric and gas
21 utilities, with a strategic focus on transformation from
22 high carbon to low carbon energy sources. Emera has
23 investments throughout North America and in four Caribbean
24 countries.

1 **Q.** Please describe the purchase of TECO Energy by Emera and
2 how it has benefited Tampa Electric's customers.

3
4 **A.** Emera officially acquired Tampa Electric in July 2016, as
5 the successful bidder in a competitive process led by TECO
6 Energy and its advisors. Emera is pleased to be part of
7 the Florida business community and to have the opportunity
8 to operate a safe and customer-focused business in the
9 Tampa Bay region and in the state through Tampa Electric
10 and its sister company, Peoples Gas System. Our customers
11 have benefited in many ways since Emera's arrival,
12 including Emera's continued commitment to the community.
13 Recent examples of our community focus are our drive to
14 reduce coal consumption and reduce emissions of CO₂, SO₂,
15 and NO_x and our focus on supporting our customers during
16 the COVID-19 pandemic. Emera has brought a disciplined
17 focus on impact and results, the success of which is shown
18 in our reliability improvements, safety results, and JD
19 Power customer service satisfaction scores. During 2020,
20 we achieved our lowest safety incident rate ever. Tampa
21 Electric has invested in technology to modernize customer
22 billing systems and Advanced Metering Infrastructure
23 ("AMI"), the modernization of Big Bend Unit 1, and
24 significant amounts of utility-scale renewable solar
25 generation for the benefit of customers. Tampa Electric's

1 improvements to its grid infrastructure are reducing the
2 number and length of disruptions. The company is
3 accomplishing these enhancements through a focus on prudent
4 investments, providing services customers desire, and cost
5 containment, and Emera has improved business stability by
6 ensuring access to equity.

7
8 **Q.** Please describe Tampa Electric's leadership and management
9 philosophy as part of Emera.

10
11 **A.** Since Emera acquired Tampa Electric in 2016, the company
12 has focused on three strategic priorities - improving
13 safety, improving the customer experience, and reducing
14 our environmental impact. This was accomplished while
15 focusing on cost control, efficiency, and prudent
16 management.

17
18 **Tampa Electric's Transformation**

19 **Q.** Please describe Tampa Electric's key actions since 2013.

20
21 **A.** Tampa Electric last requested a general base rate increase
22 eight years ago in 2013. Since then, the company has been
23 operating under two Commission-approved general base rate
24 settlement agreements, which were entered into in 2013 and
25 in 2017. These agreements limited our ability to request

1 base rate relief while allowing us to continue making sound
2 investments to serve our customers and communities. These
3 investments, combined with disciplined cost management,
4 have enabled us to begin transforming and modernizing the
5 company while maintaining customer rates that are among the
6 lowest in Florida and well below the national average.

7
8 These agreements created a constructive regulatory
9 framework for Tampa Electric, promoted rate stability and
10 predictability, and delivered important benefits to our
11 customers.

12
13 The agreements allowed the company to begin transforming
14 its generation fleet; become a solar energy leader in
15 Florida; improve safety, reliability, and the customer
16 experience; maintain a strong financial profile; take
17 advantage of low natural gas prices and reduce fuel
18 expenses; make the company's generation mix cleaner,
19 greener, and less carbon intensive; and keep operations and
20 maintenance expenses relatively flat.

21
22 **Q.** How has Tampa Electric begun transforming its generation
23 fleet?

24
25 **A.** The 2013 agreement allowed the company to harness the energy

1 associated with waste heat at its Polk Power Station by
2 converting Polk Units 2 through 5 into a highly efficient
3 combined cycle generating unit. Under the 2017 agreement,
4 the company built and recovered the cost of its investments
5 in 600 MW of cost-effective photovoltaic solar generating
6 capacity and, during its term, began important
7 transformational projects such as construction of the Big
8 Bend Modernization Project. By December 31, 2020, the Polk
9 and solar projects reduced the company's carbon emissions
10 and saved our customers over \$184 million in fuel costs.
11 Tampa Electric witness David A. Pickles provides additional
12 details regarding the company's generation plant changes
13 since 2013, including the Big Bend Modernization
14 construction status, timeline, and expected cost. Tampa
15 Electric witness J. Brent Caldwell presents the analysis
16 demonstrating the Big Bend Modernization project's prudence
17 and the savings it will provide customers.

18
19 **Q.** Does Tampa Electric plan to expand its solar generation
20 portfolio?

21
22 **A.** Yes. Tampa Electric is one of Florida's solar energy
23 leaders. Our existing solar generating assets power more
24 than 100,000 homes, businesses, and schools. We are
25 planning to build another 600 MW of "Future Solar" in three

1 tranches of approximately 225 MW, 225 MW, and 150 MW, which
2 will allow all customers to enjoy the benefits of solar
3 generation. Adding 600 MW of solar generation enhances our
4 system fuel diversity and provides fuel savings and
5 environmental benefits to customers. When we complete these
6 Future Solar projects, nearly 14 percent of our energy will
7 come from the sun. This cost-effective long term energy
8 solution will power more than 200,000 homes, promote price
9 stability for customers, increase our fuel diversity, and
10 reduce carbon emissions. Tampa Electric witness Jose A.
11 Aponte explains why 600 MW is the optimal amount of Future
12 Solar to add to our system over the next three years and
13 demonstrates the cost-effectiveness of the solar projects.
14 Tampa Electric witness C. David Sweat describes the Future
15 Solar projects, their costs, and benefits of building them
16 over the next three years.

17
18 **Q.** How has Tampa Electric improved the efficiency of its
19 generating fleet?

20
21 **A.** Tampa Electric's average net system heat rate (Btu/kWh),
22 which reflects the efficiency of our generating fleet, has
23 improved from about 9,200 in 2013 to 7,600 in 2020, an
24 improvement of about 17 percent. A more efficient
25 generation fleet means less fuel is required to generate

1 the same amount of energy. This is important because it
2 saves customers money through reduced costs of fuel, and it
3 reduces emissions.

4
5 **Q.** How has Tampa Electric improved the company's safety?

6
7 **A.** We have committed ourselves to achieving World Class
8 safety, and to the beliefs that (1) all injuries are
9 preventable and (2) no business consideration can take
10 priority over safety. In 2018, we began implementation of
11 a 10-element comprehensive safety management system
12 founded on employee ownership and engagement in safety
13 initiatives. Having a safe work environment and
14 understanding that safety is the top value at Tampa
15 Electric creates a sense of ownership among employees for
16 all outcomes of the business. Tampa Electric reported its
17 lowest OSHA recordable incident rate ever during 2020. Even
18 though our incident rate (the number of work-related
19 recordable injuries and illnesses per 100 full-time
20 employees in a one-year period) has improved significantly
21 in recent years, we believe our safety work is not done,
22 and we continue to aspire to live and work injury-free.

23
24 **Q.** How has Tampa Electric improved the customer experience?

1 **A.** Tampa Electric has improved the customer experience through
2 investments in new technology, process improvements, and
3 training for employees. Our investments in technology, like
4 our Customer Relationship and Billing system ("CRB"), AMI,
5 and other digital enhancements, provide customers more
6 convenience, choice, and self-service offerings. We now
7 offer alerts and notifications through a customer's channel
8 of choice, e.g., phone, text, or website, and a customer
9 self-service portal that allows customers to conduct
10 business with us at their convenience. We also enhanced our
11 outage map and outage communications so customers know more
12 about outages and resolution time and can report them more
13 easily. Tampa Electric also made internal process
14 improvements and transactional enhancements that make it
15 easier for customers to do business with us. We also
16 implemented new training programs that will allow customers
17 to be served more efficiently and consistently, getting
18 them the information they need without unnecessary hand-
19 offs. These investments in technology, process, and
20 training allowed us to improve our service levels,
21 including average speed of answer and call handle time when
22 customers reach us through the contact center. Tampa
23 Electric witness Melissa L. Cosby describes our customer
24 experience improvements in greater detail.

1 **Q.** Has Tampa Electric improved distribution reliability?

2
3 **A.** Yes. We have steadily improved distribution reliability
4 since 2013 through investments in our distribution
5 infrastructure, as evidenced by improvements in two main
6 reliability indices: System Average Interruption Duration
7 Index ("SAIDI") and Momentary Average Interruption
8 Frequency Index ("MAIFI"). Implementation of our annual
9 distribution reliability plan and operational changes such
10 as additional troublemen, dispatchers, and flex crews have
11 contributed to reduce outage times when they occur. These
12 actions have resulted in significant improvements in system
13 reliability, and compared to 2013, outages during 2020 were
14 20% percent shorter in duration (SAIDI), and flickers were
15 36% percent less frequent (MAIFI). Tampa Electric witness
16 Regan B. Haines describes these investments and reliability
17 improvements in his direct testimony.

18
19 **Q.** Have the company's efforts improved customer satisfaction?

20
21 **A.** Yes. Our investments and programs have improved the
22 company's safety, reliability, efficiency, and overall
23 customer experience. Our efforts have resulted in higher
24 customer satisfaction as measured by JD Power. Our JD Power
25 ranking for residential customer overall satisfaction has

1 improved from the fourth quartile in 2017 to the top of the
2 second quartile in 2020, as described in the direct
3 testimony of Ms. Cosby.
4

5 **Q.** How has the company's financial profile changed since 2013?
6

7 **A.** With more than 20 million residents, Florida is one of the
8 nation's fastest growing states, and the Tampa Bay/I-4
9 Corridor is its fastest growing area. We now serve
10 approximately 800,000 customers, up about 15 percent from
11 approximately 695,000 customers in 2013. Our rate base
12 investments have grown from about \$4 billion in 2013 to
13 \$6.7 billion today and are expected to be approximately
14 \$7.9 billion in 2022. Our annual base revenues have
15 increased from about \$900 million in 2013 to approximately
16 \$1.2 billion in 2020, or by about 33 percent. Major portions
17 of our rate base growth have helped us take advantage of
18 low-cost natural gas as our primary fuel source as well as
19 the addition of zero-cost-fuel solar generation, reducing
20 the fuel expenses borne by our customers. We reduced our
21 overall fuel expenses and delivered the value of lower
22 natural gas prices to our customers through prudent
23 construction of solar generation, expansion of dual-fuel
24 capability at our coal-fired power plants, continued
25 investments in efficient natural gas fired combined cycle

1 technology as discussed in the direct testimony of Mr.
2 Aponte, Mr. Caldwell, and Mr. Pickles.

3
4 **Q.** How have the company's fuel mix and carbon emissions changed
5 since 2013?

6
7 **A.** Since 2013, we have made significant changes in our fuel
8 mix by pivoting away from coal to natural gas and solar
9 generation. First, we reduced our coal consumption by
10 approximately 90 percent since 2015. In 2013, about 59
11 percent of Tampa Electric's electricity was generated using
12 coal, about 41 percent was natural gas-fired, and we had no
13 solar generation. By 2020, about five percent of our
14 electricity was generated using coal, about 89 percent was
15 natural gas-fired, and about 6 percent was from solar
16 generation. As I previously stated, the direct testimony of
17 Mr. Pickles provides additional information regarding the
18 changes in the company's generation fleet since 2013.

19
20 Second, these changes in our fuel generation mix resulted
21 in a significant reduction in our carbon emissions, which
22 fell from 15.7 million tons in 2013 to about 8.8 million
23 tons in 2020, a 44 percent reduction. By 2023, we will have
24 reduced our carbon dioxide emissions by the equivalent of
25 removing one million cars from local roadways. Document No.

1 3 of my exhibit shows CO₂ emissions over the last eight
2 years and demonstrates our significant reduction in CO₂
3 emissions over that period.
4

5 **Q.** How have the company's O&M expenses changed since 2013?
6

7 **A.** Despite upward pressure on the costs of providing service
8 from inflation and significant customer growth and the
9 infrastructure improvements I discussed above, we have kept
10 our operations and maintenance ("O&M") expenses essentially
11 flat from 2013 to 2020. More details about management of
12 operating costs are provided in the testimony of other Tampa
13 Electric witnesses. The direct testimony of Mr. Pickles,
14 Mr. Haines, and Ms. Cosby address management of O&M expenses
15 for Energy Supply, Electric Delivery, and Customer
16 Experience, respectively. The direct testimony of Tampa
17 Electric witness Jeffrey S. Chronister also addresses
18 management of O&M expenses.
19

20 **Q.** How do customer bills today compare with customer bills in
21 2013?
22

23 **A.** As a result of our actions to invest in assets and reduce
24 fuel and O&M expenses and a focus on cost control, we kept
25 customer bills stable, at about the same level since 2013.

1 Adding solar generation and transitioning away from coal
2 allowed us to capture the value of declining natural gas
3 prices and "no-fuel" solar to drive our typical monthly
4 residential bill lower in 2020 than it was in 2013. Our
5 typical monthly residential bill in 2013 was \$102.58 and in
6 2020 was \$97.69, a decrease of almost \$5 a month. Our 2021
7 typical monthly residential bills are among the lowest in
8 Florida and are 17 percent below the national average. We
9 expect them to remain among the lowest in Florida and below
10 the national average when including the current request for
11 rate relief.

12
13 **More Transformation and Customer Benefits to Come**

14 **Q.** Does Tampa Electric have any significant projects currently
15 underway or scheduled to begin in the next two years?
16

17 **A.** Yes. Tampa Electric is safer, cleaner and greener, and
18 provides a better customer experience than in 2013;
19 however, our work is not complete. To continue delivering
20 the value our customers expect, we must plan for the long
21 term and invest now to create an even cleaner, greener, and
22 more efficient energy future. We constantly strive to
23 identify and implement projects and strategies that will
24 further improve our safety, reliability, customer
25 experience, and environmental profile. The following

1 projects - planned or currently underway - are vital to our
2 vision for our customers and company:

3
4 1. Big Bend Modernization (Units 1 and 2)

5 The company will retire Unit 2 and repower Unit 1 as
6 a clean natural gas-fired two-on-one combined cycle
7 generating facility. The repowered Unit 1 will be the
8 most efficient generating unit in the company's fleet.
9 Among other benefits, these changes will generate
10 approximately \$750 million in cumulative present value
11 revenue requirement ("CPVRR") savings for our
12 customers. This project is discussed in greater detail
13 in the direct testimony of Mr. Caldwell.

14
15 2. Retirement of Big Bend Unit 3

16 Retiring Unit 3 in April 2023 - rather than operating
17 it on coal or natural gas until its planned retirement
18 in 2041 - will reduce carbon emissions, provide
19 operational benefits, and generate approximately \$299
20 million in CPVRR savings for our customers, as
21 described in the direct testimony of Mr. Caldwell.

22
23 3. 600 MW of Solar Generation

24 Through 2023, Tampa Electric plans to add an
25 additional 600 MW of utility-scale solar generating

1 capacity ("Future Solar") through 11 specific projects
2 across our service territory in three tranches of
3 approximately 225 MW, 225 MW, and 150 MW. These cost-
4 effective projects are expected to generate CPVRR
5 savings of over \$120 million. Mr. Sweat and Mr. Aponte
6 describe these projects and the related cost savings.
7

8 4. Smart Grid and AMI

9 Tampa Electric has plans to further empower customers
10 through technology via a multi-year project to build
11 a smarter grid that delivers more reliable, affordable
12 energy to our customers. The AMI implementation is a
13 cornerstone of our grid modernization strategy. It
14 includes installation of advanced meters,
15 communication infrastructure, and data management
16 systems, which taken together, provide the ability to
17 offer new customer engagement programs and services.
18 Mr. Haines provides more information about the
19 modernization of the grid in his direct testimony.
20 Additionally, we are investing in digital solutions to
21 offer customers more personal choice in their service
22 experiences, as explained in the direct testimony of
23 Ms. Cosby.
24

25 Q. Are there any other innovative programs and projects that

1 Tampa Electric is currently exploring?
2

3 **A.** Yes. Tampa Electric is exploring new technologies and new
4 ways to serve our customers. To support the growth of
5 electric vehicles in our service territory, Tampa Electric
6 requested and received approval to expand the availability
7 of EV charging infrastructure with a 200-port charging
8 pilot. The charging infrastructure pilot, along with
9 customer education and working with fleet operators to
10 support their conversion to EVs, will accelerate
11 transportation electrification and decarbonization.
12

13 As Mr. Pickles describes, we implemented a 12.6 MW lithium-
14 ion based battery energy storage system at Big Bend Station
15 to study the benefits of this new technology. The Big Bend
16 Battery project will examine how battery storage can
17 increase reliability of power supplied to the grid, reduce
18 peak demands, serve frequency regulation, and contribute
19 to contingency reserves.
20

21 The company is currently seeking approval for an innovative
22 new pilot program, a direct current micro-grid known as
23 the Block Energy System with Emera Technologies, Metro
24 Development Group, and Lennar Homes. This pilot will test
25 the capability of the system to provide power to 37

1 residential homes using a high proportion of renewable
2 energy as well as enhanced reliability and resiliency.

3
4 **Q.** Please describe Tampa Electric's long term goals to
5 continue to reduce greenhouse gas emissions.

6
7 **A.** In February, Emera announced its commitment to achieving
8 net zero carbon emissions by 2050. This commitment
9 complements our goal to generate as much clean power as we
10 can without compromising affordability or reliability.
11 Tampa Electric's reductions of greenhouse gas emissions
12 will contribute to achieving the Emera commitment. Tampa
13 Electric's goals are being developed and, our first
14 milestone goal is 60 percent GHG reduction by 2025 relative
15 to 2000, which will be achieved with the addition of our
16 cost-effective Big Bend Modernization project and Future
17 Solar projects. Tampa Electric is committed to producing
18 clean energy, which will contribute to a brighter future
19 for our community and the global reduction of greenhouse
20 gas emissions, as well as significant fuel savings benefits
21 for our customers.

22
23 **Q.** How has Tampa Electric helped customers during the pandemic
24 and economic downturn?

1 **A.** Tampa Electric is aware of the impact that the pandemic
2 has had on our customers and the communities we serve.
3 Since the onset of the pandemic in early 2020, Tampa
4 Electric, its sister company Peoples Gas System, and our
5 employees have donated over \$2 million to local
6 organizations providing pandemic relief. In addition to
7 financial assistance, Tampa Electric has taken several
8 other steps to assist our customers. As a result of these
9 efforts, our customers received bill payment assistance
10 totaling more than \$10 million in 2020. Ms. Cosby describes
11 our assistance to customers in more detail.

12
13 **Major Factors Necessitating a General Base Rate Increase**

14 **Q.** Why is a general base rate increase necessary?

15
16 **A.** To continue delivering the value our customers expect and
17 knowing that our customers' expectations continue to evolve
18 based on the service they receive from non-energy
19 companies, we must plan for the long term and invest now to
20 create an even cleaner, more efficient, and more reliable
21 energy future. The major factors driving the need for a
22 rate case include continued growth in rate base and
23 associated depreciation expense, modest increases to O&M
24 expenses to meet customer expectations, and revenue growth
25 that has not kept pace with the needs of our system.

1 **Q.** What are the major factors driving the need for rate relief?

2
3 **A.** The major factors causing the need for rate relief are as
4 follows.

5
6 1. The company's investment in rate base assets has grown
7 68 percent since 2013 to \$6.7 billion today and is expected
8 to be \$7.9 billion in 2022. Some of this rate base growth
9 has been addressed through incremental GBRA and Solar Base
10 Rate Adjustment ("SoBRA") revenues, but general revenue
11 growth will not be sufficient to allow the company to
12 recover the costs associated with important projects like
13 the Big Bend Modernization, Smart Grid/AMI, the Future
14 Solar generation capacity described earlier in my
15 testimony, and the general capital needs associated with
16 our growing system.

17
18 2. Our investment in Energy Supply assets (production
19 plant) will have increased by approximately \$2 billion from
20 2013 to 2022. All have improved efficiency and
21 environmental performance, are cost-effective, and are in
22 the long-run best interests of our customers. They include
23 the Polk Units 2 through 5 conversion, 655 MW of solar
24 generating capacity in service by January 2021, and the
25 capital costs associated with major planned outages at Big

1 Bend, Bayside, and Polk Power Stations, as well as the first
2 phase of the Big Bend Modernization and 225 MW of Future
3 Solar projects.

4
5 3. Since 2013, we have expanded our Electric Delivery
6 system to serve new load and have become stronger and more
7 resilient in the process. Our major capital spending in
8 Electric Delivery from 2013 to 2022 includes transmission
9 and distribution system enhancements to serve new
10 customers, preventive maintenance, and the AMI
11 implementation.

12
13 4. Our rate base growth has been accompanied by a
14 commensurate increase in depreciation expense, which has
15 grown from about \$215 million in 2013 to \$310 million in
16 2020.

17
18 5. We filed a depreciation and dismantlement study on
19 December 30, 2020 in accordance with the 2017 Agreement.
20 Depreciation expense during 2022 will be approximately \$430
21 million, of which \$46 million will be attributable to the
22 higher depreciation rates in the study. Although the
23 depreciation study filing moratorium in the 2013 and 2017
24 agreements reduced cost pressures during the term of the
25 agreements by deferring rate-driven depreciation expense

1 increases, delaying depreciation and dismantlement studies
2 had the predictable effect of pushing a material
3 depreciation expense increase into the 2022 test year.
4 Tampa Electric witnesses Davicel Avellan, Jeffrey S. Kopp,
5 and Charles R. Beitel provide detail regarding depreciation
6 and dismantlement.

7
8 6. Our December 30, 2020 depreciation and
9 dismantlement filing also outlines a need to establish
10 capital recovery schedules for the undepreciated net book
11 value on December 31, 2021 of our investment in: (a) the
12 portions of Big Bend Units 1 through 3 to be retired and
13 (b) the AMR meters to be retired in conjunction with our
14 Smart Grid initiative. The company has proposed that the
15 net book value of these assets be amortized over ten years
16 at an annual total cost of \$63 million, \$47 million of which
17 are costs for base rate assets, and \$16 million of which
18 represents assets recovered through the environmental cost
19 recovery clause. The direct testimony of Mr. Avellan
20 discusses the need for capital recovery for these assets.

21
22 7. Tampa Electric has invested in Information Technology
23 ("IT") to improve its customer experience and comply with
24 new regulations and customer privacy requirements. These
25 improvements include our CRB system and the infrastructure

1 that will support AMI. The costs we have incurred for IT
2 have been influenced by requirements of the Federal Energy
3 Regulatory Commission, the North American Electric
4 Reliability Corporation, and the Sarbanes-Oxley Act of
5 2002, as well as increased customer cybersecurity and
6 privacy demands. Our IT investments and projects are
7 described in greater detail in the direct testimony of Tampa
8 Electric witness Karen M. Mincey.

9
10 8. Although the company has been able to keep its overall
11 O&M expense levels essentially flat since 2013 through the
12 smart use of technology and prudent cost management
13 practices, the costs of labor, contractors, materials,
14 insurance, and health care benefits are accelerating at a
15 pace that is causing the company's O&M expenses to increase.
16 These increases are offset by lower tax and debt expense
17 (as explained in the direct testimony of Mr. Chronister)
18 and reasonable levels for employee compensation (as
19 explained in the direct testimony of Tampa Electric witness
20 Marian C. Cacciatore).

21
22 9. As explained in the direct testimony of Tampa Electric
23 witness Edsel L. Carlson Jr., we are not seeking an annual
24 accrual for the company's storm reserve and propose to
25 continue the storm cost recovery method specified in the

1 company's previous two base rate settlement agreements.
2 Tampa Electric witness Steven P. Harris describes our
3 storm-related risk in his storm study and direct testimony.
4

5 10. Although the Tax Cuts and Jobs Act of 2017 benefitted
6 our customers by reducing our federal income tax rate, it
7 also eliminated "bonus" depreciation for federal income tax
8 purposes. The combination of the loss of bonus depreciation
9 and the required re-valuation of our accumulated deferred
10 income tax balances has reduced the amount of zero-cost
11 capital in our capital structure, thus requiring additional
12 equity. More detail regarding this topic is provided in the
13 direct testimony of Mr. Chronister.
14

15 11. An appropriate return on common equity ("ROE") is
16 essential for a regulated utility to competitively attract
17 the capital necessary to make long-term investments,
18 maintain and improve the company's quality of service, and
19 achieve lower costs for customers over the long term. Tampa
20 Electric currently projects that its earned ROE in 2022
21 without rate relief will be below five percent which will
22 not provide the level of financial integrity needed to
23 maintain unrestricted access to cost-effective capital in
24 the market and is not in the best interest of customers or
25 shareholders. Tampa Electric requests that the Commission

1 approve an authorized ROE of 10.75 percent, with a range of
2 plus or minus 100 basis points. Tampa Electric witness Dylan
3 W. D'Ascendis supports the company's request for an
4 authorized ROE of 10.75 percent.
5

6 12. Tampa Electric requests a capital structure of 55
7 percent equity and 45 percent debt to maintain Tampa
8 Electric's financial integrity and credit ratings.
9 Maintaining an equity ratio that supports financial
10 integrity enables the company to access capital at
11 competitive rates for the investments needed to provide
12 customers with reliable service at reasonable rates.
13 Witness Kenneth D. McOnie will present the company's
14 proposed equity ratio for the 2022 test year and describe
15 how the company's proposed capital structure and revenue
16 increase will help preserve the company's overall financial
17 integrity.
18

19 **Our Request for New Rates and Charges**

20 **Q.** Please summarize the company's requested base rate
21 increase.
22

23 **A.** The company requests a \$294.9 million general base rate
24 increase and to reduce its miscellaneous service charge
25 revenues by \$6.6 million, both effective as of January 2022.

1 This increase will effectively recover the reasonable costs
2 of providing service and allow the company an opportunity
3 to earn an appropriate return on rate base. The revenue
4 requirement is addressed in greater detail in the direct
5 testimony of Tampa Electric witness A. Sloan Lewis.

6
7 The 2022 test year request addresses Phase One of the Big
8 Bend Modernization, our investment in AMI, and
9 approximately 225 MW of our planned Future Solar capacity.
10 Instead of requesting larger general base rate increases
11 for 2023 and 2024, the company requests authorization to
12 implement GBRAs in 2023 and 2024. The 2023 GBRA of \$102.2
13 million recovers costs for Phase Two of the Big Bend
14 Modernization and approximately 225 MW of additional solar
15 generation. The \$25.6 million GBRA for 2024 will recover
16 costs for about 150 MW of solar capacity. These base rate
17 increases will be partially offset by fuel savings.

18
19 Tampa Electric's proposed rate design accurately reflects
20 the cost to serve each of the various rate classes. Tampa
21 Electric witness Lorraine L. Cifuentes presents the
22 company's 2022 test year customer, energy sales, and peak
23 demand forecast. Tampa Electric witness William R. Ashburn
24 describes our proposed rate design, rates, and charges, and
25 revised tariff sheets, and Tampa Electric witness Lawrence

1 J. Vogt provides the cost of service and jurisdictional
2 separation studies.

3
4 We continue to design our rates so that it is less expensive
5 to consume under 1,000 kilowatt-hours ("kWh") in a month,
6 which benefits our low-income customers. Our 2022
7 residential bill will be only 5 percent higher than in 2009,
8 will be 17 percent lower than they were in 2009 on an
9 inflation-adjusted basis, will still be among the lowest in
10 Florida, and will remain below the national average.

11
12 **Actions Taken to Avoid a Retail Base Rate Increase**

13 **Q.** What actions have you taken to avoid a retail base rate
14 increase?

15
16 **A.** Since 2013, Tampa Electric has worked diligently to keep
17 its costs low. The company continues to pursue efficiency
18 improvements and cost reductions in all areas of its
19 operations. Here are some of the steps we have taken to
20 avoid seeking a general base rate increase:

- 21
22 • Since 2013, we have voluntarily limited our ability to
23 request general base rate increases by entering the 2013
24 and 2017 agreements. These agreements have provided
25 demonstrable benefits to our customers.

1 • We reduced base revenues by approximately \$107.0 million
2 without delay to give our customers 100 percent of the
3 expense savings from federal and state tax rate
4 reductions.

5
6 • The company has used cost discipline, process and system
7 improvements, smart asset management, and has controlled
8 O&M expenses since 2013. This results in proposed O&M
9 expense levels for our 2022 test year that will be
10 significantly below the Commission's benchmark, as
11 described in the direct testimony of Mr. Chronister.

12
13 • We have captured the benefit of lower borrowing costs
14 for our customers. The company has refinanced higher cost
15 debt at lower rates, issued new debt at historically low
16 rates, and adjusted our short-term borrowing portfolio
17 to optimize the use of instruments with the lowest
18 attainable rates.

19
20 **SUMMARY**

21 **Q.** Please summarize your direct testimony.

22
23 **A.** My direct testimony describes the prudent ways we have
24 invested to reduce our environmental impact and improve
25 our customers' experience, all while controlling our costs.

1 Tampa Electric has implemented a strategy of reducing fuel
2 expense through replacement of older and higher cost
3 generation with newer, cost effective renewables and other
4 lower-carbon generation. Up to now, the costs of these
5 capital investments have been offset by lower fuel expense
6 and reduced operating costs associated with the investments
7 as well as some GBRA and SoBRA revenues included in our
8 2013 and 2017 agreements. Tampa Electric has kept O&M
9 expenses relatively flat over a period of years. We sought
10 and implemented efficiencies, controlled costs, made
11 prudent investments, and improved customer satisfaction
12 over the last several years. These efforts have allowed
13 Tampa Electric to avoid a general base rate increase since
14 2013.

15
16 My direct testimony describes how Tampa Electric is
17 requesting a \$294.9 million increase in base rates and
18 reduction of miscellaneous service charge revenues of \$6.6
19 million effective January 2022, based on a 2022 projected
20 test year. This increase will cover the reasonable costs of
21 providing service and allow the company an opportunity to
22 earn an appropriate return on rate base. To promote
23 regulatory efficiency and avoid larger general base rate
24 increases for 2023 and 2024, the company also requests
25 approval for GBRA in 2023 and 2024. The 2023 GBRA is \$102.2

1 million, and the 2024 GBRA request is \$25.6 million.

2

3 I also introduce the other company witnesses and list the
4 topics discussed in their direct testimony.

5

6 **Q.** Does this conclude your direct testimony?

7

8 **A.** Yes, it does.

9

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TAMPA ELECTRIC COMPANY
DOCKET NO. 20210034-EI
WITNESS: COLLINS

EXHIBIT

OF

ARCHIBALD D. COLLINS

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**List of Tampa Electric Witnesses
And Purposes of Their Direct Testimony**

Witness	Purposes of Direct Testimony
Archibald D. Collins	Provides overview of the actions and initiatives taken since 2013, our performance highlights, significant work planned or underway, actions taken to avoid new rates, and the request for new rates.
Melissa L. Cosby	Presents the operational changes since 2013 that have improved the customer experience, describes the company's response to the COVID-19 pandemic, explains how the company measures its performance in customer service and satisfaction metrics, provides details about the company's plans for improving customer experience, and demonstrates that the company's proposed Customer Experience capital budget and O&M expenses for the 2022 test year are reasonable and prudent.
David A. Pickles	Describes other generation plant additions since 2013, other planned generation plant additions, overall generation reliability and efficiency metrics and details of the O&M Benchmark results in Energy Supply, demonstrates that the company's production plant construction program and capital budget for 2022 and 2023 are reasonable and prudent, and shows that the company's proposed level of O&M expense for Energy Supply in the 2022 test year is reasonable and prudent.
J. Brent Caldwell	Describes the Big Bend Modernization project and its benefits to customers; explains why the retirement of Big Bend Unit 3 is prudent.

Witness	Purposes of Direct Testimony
C. David Sweat	Describes the Future Solar projects and their construction timelines and costs.
Jose A. Aponte	Describes the reason 600 MW is the appropriate amount of solar generation to add to our system now; demonstrates the cost-effectiveness of the Future Solar projects.
Regan B. Haines	Describes transmission and distribution plant additions since 2013 (including AMI), transmission and distribution plant additions planned for the future, transmission and distribution reliability metrics and details of the O&M Benchmark results in Electric Delivery, demonstrates that the company's T&D construction program and capital budget for 2022 is reasonable and prudent, and shows that the company's proposed level of O&M expense for Electric Delivery during the 2022 test year is reasonable and prudent.
John C. Heisey	Describes the prudent level of fuel inventory for the test year; describes the company's Optimization Mechanism and explains why it should be continued.
Karen M. Mincey	Describes the company's investments in information technology since 2013, its future plans for information technology improvements, describes the impact of information technology changes on the company's 2022 test year rate base and expenses.
Marian C. Cacciatore	Describes and justifies the company's employee compensation and benefits system.
Lorraine L. Cifuentes	Presents and explains the company's 2022 test year customer, energy sales and peak demand forecast.

Witness	Purposes of Direct Testimony
Lawrence J. Vogt	Presents the company's cost of service and jurisdictional separation studies.
A. Sloan Lewis	Presents the proposed 2022 test year and describes the 2022 operating budget as reflected in MFRs; describes the budgeting process and sources of financial information; presents calculation of overall revenue requirement and required revenue increase for 2022 test year.
Kenneth D. McOnie	Presents the company's proposed equity ratio for the 2022 test year and describes how the company's proposed equity ratio is prudent and needed to preserve the company's overall financial integrity and credit metrics.
Dylan W. D'Ascendis	Presents company's proposed rate of return on equity and supporting calculations.
Davicel Avellan	Presents the company's depreciation study, proposed depreciation rates and proposed level of 2022 test year depreciation expense and describes and justifies the special cost recovery schedules proposed by Tampa Electric for the undepreciated net book value of assets retired in conjunction with the Big Bend Modernization Project, Big Bend Unit 3 retirement, and AMR meters.
Jeffrey S. Kopp	Presents the company's traditional dismantlement study and proposed dismantlement costs reflected in the company's proposed depreciation rates.

Witness	Purposes of Direct Testimony
Charles R. Beitel	Presents the selective dismantlement studies for Big Bend Units 1 through 3 and proposed dismantlement costs reflected in the company's proposed depreciation rates and capital recovery schedules.
Steven P. Harris	Describes and presents the company's storm damage loss and reserve study.
Edsel L. Carlson, Jr.	Describes the proposed storm cost recovery method and insurance costs.
Jeffrey S. Chronister	Describes regulatory agreements; the change in the company's financial profile since 2013; income tax and capital structure; presents the company's GBRA proposal as well as a proposed tax rate change methodology.
William R. Ashburn	Presents the company's proposed rate design and proposed rates and tariffs.

TAMPA ELECTRIC COMPANY
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WITNESS: COLLINS
DOCUMENT NO. 2
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LIST OF MINIMUM FILING REQUIREMENT SCHEDULES

SPONSORED BY ARCHIBALD D. COLLINS

MFR Schedule	Title
F-09	Public Notice



