

40

**TECO's responses to staff's second set of
interrogatories Nos. 7-27**

(Including Attachments)

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 7
BATES PAGES: 1 - 2
FILED: JULY 11, 2022**

7. Staff has reviewed TECO's revised 2022 cost recovery factors and supporting documents using the methodology agreed to by the parties to the 2021 Stipulation and Settlement Agreement filed in Docket No. 20210034-EI.
- a. Please reconcile the \$574,835 and \$990,560 true-up amounts shown in lines 2 and 3 of Document No. 7, page 1 of 31, Third Revised Exhibit MRR-2 (Document No. 11985-2021 in Docket No. 20210034-EI) with the filing amount of \$1,433,675 shown in Line 2 of Form E-2 of Document No. 8, page 2 of 38, Exhibit MRR-2 (Document No. 02728-2022 in Docket No. 20220010-EI).
 - b. Please indicate whether TECO believes the filings in Docket No. 20220010-EI and Document No. 11985-2021 described immediately above in Interrogatory 17(a) should be consistent.
 - c. If TECO does not believe the filings in Docket No. 20220010-EI and Document No. 11985-2021 described immediately above in Interrogatory 17(a) should be consistent, please explain the bases for that belief.
- A. a. The \$1,433,675 shown in Line 2 of Form E-2 of Document No. 8, page 2 of 38, Exhibit MRR-2 (Document No. 02728-2022 in Docket No. 20220010-EI) is made up of the \$990,560 Final True-up for the year 2020 shown on line 6 of Form A-1 of Docket No. 20210010-EI and the \$443,115 Actual-Estimate forecast for 2021 shown on line 2 of Form P-1 of Document No. 5, page 1 of 31, Exhibit MRR-2 (Document 03977-2021 in Docket No. 20210010-EI). The Final 2020 True-Up amount of \$990,560 that is embedded in the \$1,433,675 in Document No. 02728-2022 ties to the \$990,560 final true-up for 2020 reflected on line 3 of Document No. 7, page 1 of 31, Third Revised Exhibit MRR-2 (Document No. 11985-2021 in Docket No. 20210010-EI).

Document No. 03977-2021 in Docket 20210010-EI was subsequently superseded by Document No. 11985-2021, which incorrectly updated the original 2021 Actual-Estimate amount of \$443,115 to a new estimate of \$574,835 by applying the revised ROE 9.95 percent from 10.25 percent in the WACC calculation. The new ROE of 9.95 percent is used to establish the base amount of revenue requirements for 2021 as a step to determine the incremental portion of revenue requirements that will be allocated based upon the methodology that was approved in the company's 2021 Stipulation

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 7
BATES PAGES: 1 - 2
FILED: JULY 11, 2022**

and Settlement Agreement but should not have been used to determine the 2021 actual-estimate amounts.

- b. Yes, the company agrees that these values should have been consistent. Because of this difference, Tampa Electric will include the appropriate recalculated actual/estimate amounts to be used for rate setting in 2023 when the company files an updated Storm Protection Plan Cost Recovery Clause ("SPPCRC") projection filing that is being developed with updated 2023 Billing Determinants. The company projects this updated filing to occur in the beginning of August 2022.
- c. Not applicable

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 8
BATES PAGE: 3
FILED: JULY 11, 2022**

- 8.** Please refer to line 4 of Document No. 7, page 1 of 31, Third Revised Exhibit MRR-2 (Document No. 11985-2021) showing a \$46,506,899 amount as the net total projected 2022 revenue to be collected during 2022, excluding the revenue tax multiplier.
- a. Please reconcile this amount with the \$48,202,363 amount shown on line 1 of Form E-2 in Exhibit MRR-2, Document No. 8, page 2 of 38 (Document No. 02728-2022 in Docket No. 20220010-EI).
 - b. Please indicate whether TECO believes the filings in Docket No. 20220010-EI and Document No. 11985-2021 described immediately above in Interrogatory 18(a) should be consistent.
 - c. If TECO does not believe the filings in Docket No. 20220010-EI and Document No. 11985-2021 described immediately above in Interrogatory 18(a) should be consistent, please explain the bases for that belief.
- A.**
- a. The \$46,506,899 shown on line 4 of Document No. 7, page 1 of 31, Third Revised Exhibit MRR-2 (Document No. 11985-2021) reflects the sum of the final true-up amount for 2020 (line 3), the estimated true-up for 2021 based on the incorrect usage of an ROE of 9.95 percent for 2021 (line 2) (similar to what was explained in Response No. 1a above), and the projected revenue requirement for 2022.

The company's 2022 SPPCRC budget, prepared prior to the ROE adjustment, totaled \$48,060,180 of revenue net of Regulatory Assessment fees and was calculated based on factors designed to recover the \$47,920,654 shown on line 4 of Form P-1 in Exhibit MRR-2, Document No. 03977-2021, which was comprised of the 2020 final true-up amount (line 3), plus the estimated 2021 true-up and projected 2022 revenue requirement, where both of the latter were based on the original ROE of 10.25 percent.
 - b. Yes, the company believes these values should be consistent and will incorporate the appropriate adjustments in the company's revised SPPCRC projection filing as explained in Response No. 1b above.
 - c. Not applicable

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 9
BATES PAGE: 4
FILED: JULY 11, 2022**

- 9.** Please refer to line 8.b "Subtotal of Lateral Underground Programs" of Document No. 8, page 4 of 38, Exhibit No. MRR-2 in TECO's May 2, 2022 filing. Please identify the primary factors that resulted in a variance.
- A.** The primary factor causing the O&M variance in the Distribution Lateral Undergrounding program is the establishment of a stand-alone and physically separate warehouse that is used to support only SPP work. The company's current service area warehouses did not have the physical space needed to have all of the material, including minor materials, to support this program.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 10
BATES PAGE: 5
FILED: JULY 11, 2022**

- 10.** Please refer to line 1.a "Subtotal of Distribution Lateral Undergrounding Program: of Document No 8, page 10 of 38, Exhibit No. MRR-2 TECO's May 2, 2022 filing. Please identify the primary factors that resulted in a variance.

- A.** The primary factor causing the capital variance in the 2022 Distribution Lateral Undergrounding program was due to the amount and timing of the actual spend being less than projected. This causes a variance, not only in the reduction in actual spend but also causes a lower amount of return in future years which both contributed to the variance in the overall revenue requirement.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 11
BATES PAGE: 6
FILED: JULY 11, 2022**

- 11.** Please refer to line 2.a "Subtotal of Asset Upgrade O&M Programs" of Exhibit No. MRR-1, Schedule Form A-4, page 1 of 1 TECO's April 1, 2022 filing. Please identify the primary factors that resulted in a variance.
 - A.** The primary factor which caused the variance in the 2021 O&M portion of the Transmission Asset Upgrades program is the program required less wire transfer costs from the wood poles removed to the non-wood poles installed than projected.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 12
BATES PAGE: 7
FILED: JULY 11, 2022**

- 12.** Please refer to line 2.a "Subtotal of Transmission Asset Program" of Exhibit No. MRR-1, Schedule Form A-6, page 1 of 1 TECO's April 1, 2022 filing. Please identify the primary factors that resulted in a variance.
 - A.** The primary factor which caused the variance in the 2021 capital portion of the Transmission Asset Upgrades programs is the timing of projects and the associated clearings to plant were less than projected.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 13
BATES PAGE: 8
FILED: JULY 11, 2022**

- 13.** Please refer to Page 10 lines 12-19 of Witness Plusquellic's testimony filed on April 1, 2022. Witness Plusquellic asserts the cost variance in the Distribution Overhead Feeder Hardening program in 2020 was "driven by completing less construction that was originally forecast". Please describe the primary factors that resulted in completing less construction than was originally forecasted.
- A.** There were three primary factors that lead to the variance in 2021 for this program. The first, and main, contributing factor was the initial availability of engineers that were able to appropriately design overhead to underground conversion projects. Tampa Electric uses contractor partners to do this design work. The contractor partners took longer than projected to staff their design teams due to the much tighter job market being experienced. Then, once the design team was staffed, they needed to be trained on Tampa Electric's design criteria to ensure the standards required by the company would be met. The second contributing factor was the process of gaining customer easements, in addition to obtaining permits to support the overhead to underground conversion is taking much longer than originally projected. During 2021 and ending in early 2022, the company obtained the assistance of a consultant to help determine the most cost-effective way to mitigate this issue. The third contributing factor is the company experienced a slight delay in material due to the tightened supply chain market and processing of material to support this program.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 14
BATES PAGE: 9
FILED: JULY 11, 2022**

- 14.** Please refer to line 5.a "Subtotal of Transmission Access Enhancement Program" of Exhibit No. MRR-1, Schedule Form A-6, page 1 of 1 TECO's April 1, 2022 filing. Please identify the primary factors that resulted in a variance.
- A.** There were two primary factors, contractor procurement delays and supply chain limitations, that contributed to the variance in the Transmission Access Enhancement Program for 2021.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 15
BATES PAGE: 10
FILED: JULY 11, 2022**

- 15.** Please refer to line 5.a "Subtotal of Transmission Access Enhancement Program" of Document No 8, page 10 of 38, Exhibit No. MRR-2 TECO's May 2, 2022 filing. Please identify the primary factors that resulted in a variance.
 - A.** There was one primary factor, lower than expected environmental permitting expenses, that contributed to the variance in the Transmission Access Enhancement Program for 2022.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 16
BATES PAGE: 11
FILED: JULY 11, 2022**

- 16.** Please refer to line 1.a “Subtotal of Vegetation Management Program” of Document No. 8, page 4 of 38, Exhibit No. MRR-2 TECO’s May 2, 2022 filing showing zero variance. Please explain how TECO was able to achieve zero variance.
- A.** Tampa Electric’s current year-to-date expenses (as of February) and the estimated remaining amount (March through December) as provided in the filing on May 2, 2022, is still projecting to spend in 2022, the same amount as what was originally projected in 2021 for 2022 in the company’s Vegetation Management Program which is resulting in a zero variance.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 17
BATES PAGE: 12
FILED: JULY 11, 2022**

- 17.** Please refer to line 6.a "Subtotal of Infrastructure Inspection Programs" of Exhibit No. MRR-1, Schedule Form A-4, page 1 of 1 TECO's April 1, 2022 filing. Please identify the primary factors that resulted in a variance.
- A.** The primary reasons for the variance in 2021 for the Infrastructure Inspection Program are:
- The variance in 2021 for distribution occurred due to the way the company projects the annual budget and the process for conducting distribution pole inspections. Budgets are based on the average inspected cost for a pole in the previous year. The quantities and magnitude of costs of inspection activities will vary by location, such as groundline excavations for poles greater than 16 years old, additional required pole treatments, repair of pole ground wires and replacement of guy wire markers.
 - The variance in 2021 for transmission occurred due incurring lower inspections costs to complete the projected transmission inspections in 2021.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 18
BATES PAGE: 13
FILED: JULY 11, 2022**

- 18.** Please refer to line 6 “Infrastructure Inspection O&M Programs”, subline 1 “Distribution Infrastructure Inspections” of Document No. 8, page 4 of 38, Exhibit No. MRR-2 May 2, 2022 filing. Please explain how TECO was able to achieve zero variance.

- A.** Tampa Electric is projecting to incur the same amount of spend for distribution infrastructure inspections as was originally projected last year. The main reasons for the projected zero variance are the projection for the SPPCRC uses two months of actuals and ten months of projected numbers and the company began inspections in 2022, in late January.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 19
BATES PAGE: 14
FILED: JULY 11, 2022**

- 19.** Please refer to line 6.a “Subtotal of Infrastructure Inspection Programs” of Document No. 8, page 4 of 38, Exhibit No. MRR-2 TECO’s May 2, 2022 filing. Please clarify the primary factors that resulted in a variance.
- A.** The primary factor contributing to the variance in the “Subtotal of Infrastructure Inspection Programs” is Tampa Electric projecting to incur more inspection costs in 2022 due to staffing changes which is requiring training new substation apprentices.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 20
BATES PAGE: 15
FILED: JULY 11, 2022**

- 20.** Please refer to line 7.a "Subtotal of Common SPP O&M Programs" of Exhibit No. MRR-1, Schedule Form A-4, page 1 of 1 TECO's April 1, 2022 filing. Please clarify the primary factors that resulted in a variance.
- A.** The main driver for the variance in 2021 in the O&M category of "Common SPP" was due to higher than expected internal procurement services costs than originally projected. In the researching of this main driver, the company found that an internal team member had been using an incorrect charging number to charge their time. This incorrect charging will be corrected with a journal entry in early July so that the amount will be reflected in the company's updated 2022 projection for 2023 recovery that will be filed with the Commission by early September.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 21
BATES PAGE: 16
FILED: JULY 11, 2022**

- 21.** Please refer to Page 34 lines 9-25 and Page 35 lines one through two of Witness Plusquellic's testimony filed on May 2, 2022.
- a. Will the work product of the external consultants be used in non-SPP activities?
 - b. If so, is TECO proposing to allocate some of the cost of the to non-SPP activities?
 - c. If TECO is proposing to use an allocation, please explain how TECO developed its allocation.
 - d. If TECO is not proposing to use an allocation, please explain why.
- A.**
- a. No, all of the work product provided by external consultants are only for SPP activities.
 - b. Not applicable
 - c. No, because of the external consultant's product benefiting many of the company's SPP programs and to provide transparency in cost reporting, the company chose to charge their costs to the SPP O&M Common category.
 - d. Please See Response No. 21c above.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 22
BATES PAGES: 17 - 18
FILED: JULY 11, 2022**

- 22.** Please refer to the May 2, 2022 testimony of Mark R. Roche, Exhibit MRR-2, Form E-7 Detail, Page 1 of 5. Please provide the source of the 7.5 percent depreciation rate associated with Account 392.02.
- A.** Please refer to the Excel file titled, "(BS_18) TEC Depreciation Rates Per 2021 Rate Case". Account 39202 can be found in cell C428 on tab "B-7-2022", and the applicable depreciation rate of 7.5 percent is listed in cell F428. The depreciation rates listed resulted from Tampa Electric's most recent Depreciation Study that were approved in the 2021 Rate Case Stipulation and Settlement Agreement by Final Order No. PSC-2021-0423-S-EI, issued on November 10, 2021.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 23
BATES PAGES: 19 - 20
FILED: JULY 11, 2022**

- 23.** Please refer to the May 2, 2022 testimony of Mark R. Roche, Exhibit MRR-2, Form E-7 Detail, Page 1 of 5. Using the Distribution Lateral Undergrounding Program as an example, please provide the calculation with formula intact that was used for the depreciation expense represented on line 8a.
- A.** Please refer to the Excel file titled, "(BS_20) DLU Capital Detail Schedule". The calculations for the 2022 DLU depreciation expense can be found in cells AI3816 through AT5111 on the "Distr. Lateral Undergrounding" tab.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 24
BATES PAGES: 21 - 22
FILED: JULY 11, 2022**

24. For the following questions, please refer to the Testimony and Exhibit of Mark R. Roche, filed May 2, 2022 (Document No. 02728-2022), and Schedules 2.1, 3.1, and 3.2 of TECO's 2022 Ten Year Site Plan (TYSP).

- a. Please explain why TECO's projected 2023 RS energy sales (Tier 1, Tier 2, RSVP) in the amount of 9,842,928 MWh, as appears in Exhibit No. MRR-2, Document No. 1, does not match TECO's forecasted 2023 "Rural and Residential GWh" energy sales in the amount of 9,853,000 MWh, as shown in Schedule 2.1 of TECO's 2022 TYSP.
- b. Please explain how the TECO's projected 2023 energy demand figures (GSD, SBD, GSLDPR, SBLDPR, GSLDSU, SBLDSU), as appears in Exhibit No. MRR-2, Document No. 1, relate to the peak demand forecasts reflected in Schedules 3.1 and 3.2 of TECO's 2022 TYSP.

A. a. Tampa Electric's projected 2023 Residential Service ("RS") energy sales in the amount of 9,842,928 Megawatt-hours ("MWh"), as it appears in Exhibit No. MRR-2, Document No. 1, does not match the company's forecasted 2023 "Rural and Residential Gigawatt-hours ("GWh")" energy sales of 9,853 GWh (or 9,853,000 MWh) on Schedule 2.1 of Tampa Electric's 2022 Ten Year Site Plan ("TYSP") because Schedule 2.1's grouping includes the entire residential customer class, not just the RS and Residential Service Variable Pricing ("RSVP") rates.

The "Rural and Residential" category, as referred to in the TYSP, includes customers on RS and RSVP rates, along with some residential lighting customer in the Lighting Service – 1 ("LS-1) rate and some General Service Demand ("GSD") customers. Some larger usage residential customers benefit from being on the GSD rate due to their consumption.

The Storm Protection Plan billing determinants do not include any GSD energy, only demand. The residential lighting energy (LS-1 energy) is included in Exhibit No. MRR-2, Document No. 1 under the line item labeled, "LS1, LS2".

- b. Tampa Electric's projected 2023 energy demand figures (GSD, Standby and Supplemental Demand Service ("SBD"), Standby Large Demand Primary ("SBLDPR"), General Service Large Demand Primary ("GSLDPR"), Standby Large Demand Subtransmission ("SBLDSU"), and General Service Large Demand Subtransmission ("GSLDSU")), as appears in

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 24
BATES PAGES: 21 - 22
FILED: JULY 11, 2022**

Exhibit No. MRR-2, Document No. 1, do not relate to the peak demand forecasts reflected in Schedules 3.1 and 3.2 of the company's 2022 TYSP. The demands listed in Exhibit No. MRR-2 represent the sum of the maximum "billing demands" of each demand rate customer. The TYSP reports the system retail peak demand for winter and summer. So, these numbers are not comparable.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 25
BATES PAGE: 23
FILED: JULY 11, 2022**

25. For each energy and demand forecast used to support the Company's billing determinants appearing in Exhibit No. MRR-2, Document No. 1, please provide the annual actuals for calendar years 2016-2021 and the annual projections for 2022 and 2023.

A. Refer to the table below for annual actuals for the calendar years 2016-2021 and the annual projections for 2022 and 2023.

Billing History and Forecast By Rate Category Groupings

	Year	RS [Tier 1, Tier 2, RSVP] MWh	GS & CS MWh	GSD, SBD kW	GSD Optional MWh	IS, IST kW	SBFT, SBIT kW	GSLDPR, SBLDPR kW	GSLDSU, SBLDSU kW	LS1, LS2 MWh
Actual	2016	9,169,616	989,064	17,288,353	378,111	1,634,065	2,510,413	NA	NA	215,641
Actual	2017	9,014,852	962,748	17,713,314	374,055	1,642,474	2,603,581	NA	NA	210,801
Actual	2018	9,400,185	992,723	17,070,757	508,743	1,708,217	2,520,965	NA	NA	202,085
Actual	2019	9,568,854	985,210	17,441,189	421,749	1,691,993	2,606,358	NA	NA	175,477
Actual	2020	10,107,463	933,571	17,255,523	385,109	1,224,042	2,627,163	NA	NA	154,234
Actual	2021	9,927,245	937,143	17,477,884	403,021	1,208,810	3,184,712	NA	NA	135,785
Forecast	2022	9,728,165	953,392	15,840,806	416,005	NA	NA	2,466,844	3,373,870	110,703
Forecast	2023	9,842,928	961,860	15,934,954	417,662	NA	NA	2,467,013	3,357,754	105,934

NOTES:

1) Groupings represent billing determinants used to prepare Storm Protection Plan clause rates.

2) GSD, SBD grouping history 2016 - 2021 and forecast 2022, 2023 are not apples to apples, some of these customers moved to new rate categories effective Jan 1, 2022.

3) "GSLDPR, SBLDPR" and "GSLDSU, SBLDSU" groupings are new rates, effective Jan 1, 2022. We have no history for these groupings.

4) "IS, IST" and "SBFT, SBIT" are closed rates, effective Jan 1, 2022.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 26
BATES PAGE: 24
FILED: JULY 11, 2022**

- 26.** Please list the date(s) of all underlying forecasts that were used to formulate the billing determinants appearing in Exhibit No. MRR-2, Document No. 1.
- A.** The underlying forecasts used to formulate the billing determinants appearing in Exhibit No. MRR-2, Document No. 1 were prepared August 21, 2021.


**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220010-EI
STAFF'S SECOND SET OF
INTERROGATORIES
INTERROGATORY NO. 27
BATES PAGE: 25
FILED: JULY 11, 2022**

- 27.** Please identify all closed and open Commission dockets and all non-docketed Commission matters in which the same load forecast used to support the Company's billing determinants appearing in Exhibit No. MRR-2, Document No. 1, has been submitted for approval to the Commission.
- A.** The load forecast used to support the company's billing determinants appearing in Exhibit No. MRR-2, Document No. 1, submitted for approval to the Commission to develop Tampa Electric's Storm Protection Plan Cost Recovery Clause projection filed on May 2, 2022, has not been part of any other filing. There are no closed or open Commission dockets, and no non-docketed Commission matters in which the same load forecast has been used. In addition, the company referenced in the projection petition that due to the hearing shifting to November of this year, the company will provide updated proposed recovery factors using the updated billing determinants that will be developed in the summer of 2022, that will also support the other clauses for Tampa Electric.


STATE OF FLORIDA)
)
COUNTY OF HILLSBOROUGH)

Before me the undersigned authority personally appeared David L. Plusquellic who deposed and said that he is Director, Storm Protection and Support Services, Tampa Electric Company, and that the individuals listed in Tampa Electric Company's response to Staff's Second Set of Interrogatories, (No. 9-21) prepared or assisted with the responses to these interrogatories to the best of his information and belief.

Dated at Tampa, Florida this 20th day of June, 2022.



Sworn to and subscribed before me this 20th day of June, 2022.



My Commission expires _____



A F F I D A V I T


STATE OF FLORIDA)
)
COUNTY OF HILLSBOROUGH)

Before me the undersigned authority personally appeared Mark R. Roche who deposed and said that he is Manager Regulatory Rates, Tampa Electric Company, and that the individuals listed in Tampa Electric Company's response to Staff's Second Set of Interrogatories, (Nos. 7-8, 22-27) prepared or assisted with the responses to these interrogatories to the best of his information and belief.

Dated at Tampa, Florida this 20 day of June, 2022.



Sworn to and subscribed before me this 20th day of June, 2022.



My Commission expires _____

