

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition for recovery of costs)	DOCKET NO. 20170271-EI
associated with named tropical)	FILED: MARCH 13, 2019
storms during the 2015, 2016, and)	
2017 hurricane seasons and)	
replenishment of storm reserve)	
subject to final true-up)	
<u>Tampa Electric Company</u>)	

**TAMPA ELECTRIC COMPANY'S
ANSWERS TO SEVENTH REQUEST FOR
PRODUCTION OF DOCUMENTS (NOS. 19 - 32)
OF
OFFICE OF PUBLIC COUNSEL**

Tampa Electric files this its Answers to Production of Documents (Nos. 19 - 32) propounded and served on February 26, 2019 by the Office of Public Counsel.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20170271-EI
INDEX TO OPC'S SEVENTH REQUEST FOR
PRODUCTION OF DOCUMENTS (NOS. 19-32)**

<u>Number</u>	<u>Subject</u>	<u>Bates Stamped Pages</u>
19	Please provide copies of all contracts, agreement, purchase orders, work orders, and all other agreements or documents that show the rates for any embedded vendor's crew that worked for you at any time or in any capacity during 2014, 2015, 2016, 2017, and 2018. The term "embedded vendor" means a vendor providing storm restoration and repair crews, transmission repair, restoration and construction crews, and vegetation management crews, and which vendor also performs similar or additional types of services for you in non-storm restoration (non-emergency) condition on a year-round basis.	1
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22	Please provide a copy of all documents that you rely on to support your answers to interrogatory 117.	25
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24	Please provide a copy of all documents that you rely on to support your answers to interrogatory 119.	27
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26	Please provide a copy of all documents that you rely on to support your answers to interrogatory 121.	29
27	Please provide a copy of all documents that you rely on to support your answers to interrogatory 122.	30
28	Please provide a copy of all documents that you rely on to support your answers to interrogatory 123.	31
29	Please provide a copy of all documents that you rely on to support your answers to interrogatory 124.	32
30	Please provide a copy of all documents that you rely on to support your answers to interrogatory 125.	34
31	Please provide a copy of all documents that you rely on to support your answers to interrogatory 126.	35
32	Please provide a copy of all documents that you rely on to support your answers to interrogatory 127.	36

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OPC'S SEVENTH REQUEST FOR
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DOCUMENT NO. 19
BATES STAMPED PAGES: 1 - 22
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- 19.** Please provide copies of all contracts, agreement, purchase orders, work orders, and all other agreements or documents that show the rates for any embedded vendor's crew that worked for you at any time or in any capacity during 2014, 2015, 2016, 2017, and 2018. The term "embedded vendor" means a vendor providing storm restoration and repair crews, transmission repair, restoration and construction crews, and vegetation management crews, and which vendor also performs similar or additional types of services for you in non-storm restoration (non-emergency) condition on a year-round basis.
- A.** Tampa Electric is providing the following confidential copies of contracts, agreements, purchase orders, work orders, and any other agreements or documents that show the rates for any embedded vendor's crew that worked for Tampa Electric at any time or in any capacity during 2014, 2015, 2016, 2017 and 2018:
- (BS_2) 2013-2017_VMEmbeddedVendorContract_1.pdf
 - (BS_3) 2013-2017_VMEmbeddedVendorContract_2.pdf
 - (BS_4) 2018_VMEmbeddedVendorContract_1.pdf
 - (BS_5) 2018_VMEmbeddedVendorContract_2.pdf
 - (BS_6) Fishel Agreement TDO – 31-11 w Amendments 1-3.pdf
 - (BS_7) Fishel.Amendment to rates April 2018 start.pdf
 - (BS_8) Fishel.Rates April 2018 start.xlsx
 - (BS_9) Fishel.Rates for New Construction & Maint for Feb 2017 - Apr 2018.pdf
 - (BS_10) Fishel.Rates for Reconductoring & Upgrades for Feb 2017 - Apr 2018.pdf
 - (BS_11) Fully Executed Master Agreement 16-00187 - American Lighting & Signalization.pdf
 - (BS_12) Fully signed Agreement TDO-22-10 w Amendments.pdf
 - (BS_13) Fully signed Agreement TDO-59-15.pdf
 - (BS_14) Pike Agreement GS-634-14 w Amendments 1-8.pdf
 - (BS_15) Pike Contract.Rates for Oct 2018 start.pdf
 - (BS_16) Powertown Contract.Rates for May 2018 start.pdf
 - (BS_17) Powertown Contract.Rates for Oct 2015 - Apr 2018.pdf
 - (BS_18) Service Electric Contract.Rates for 2015.pdf
 - (BS_19) Service Electric Contract.Rates for Oct 2015 - Nov 2016.pdf
 - (BS_20) Service Electric.Rates for network grounding kits.mid 2018 start.xlsx
 - (BS_21) SPE Agreement No. TDO-21-10 w Amendments.pdf
 - (BS_22) SPE Pole Replacement Rate Schedule.pdf

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DOCUMENT NO. 20
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- 20.** Please provide a copy of all documents that you rely on to support your answers to interrogatory 115.
- A.** See documents provided in Production of Documents No. 19 of this set.

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- 21.** Please provide a copy of all documents that you rely on to support your answers to interrogatory 116.
- A.** See documents provided in Production of Documents No. 19 of this set.

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DOCUMENT NO. 22
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- 22.** Please provide a copy of all documents that you rely on to support your answers to interrogatory 117.
- A.** See documents provided in Production of Documents No. 19 of this set.

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- 23.** Please provide a copy of all documents that you rely on to support your answers to interrogatory 118.
- A.** See documents provided in Production of Documents No. 19 of this set.

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- 24.** Please provide a copy of all documents that you rely on to support your answers to interrogatory 119.
- A.** See documents provided in Production of Documents No. 19 of this set.

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- 25.** Please provide a copy of all documents that you rely on to support your answers to interrogatory 120.
- A.** See documents provided in Production of Documents No. 19 of this set.

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- 26.** Please provide a copy of all documents that you rely on to support your answers to interrogatory 121.
- A.** See documents provided in Production of Documents No. 19 of this set.

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- 27.** Please provide a copy of all documents that you rely on to support your answers to interrogatory 122.
- A.** See documents provided in Production of Documents No. 19 of this set.

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- 28.** Please provide a copy of all documents that you rely on to support your answers to interrogatory 123.
- A.** See documents provided in Production of Documents No. 19 of this set.

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DOCUMENT NO. 29
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- 29.** Please provide a copy of all documents that you rely on to support your answers to interrogatory 124.
- A.** Tampa Electric is providing the Excel workbook titled, "(BS_33) Support for IRR 124 125 126 127 – OPC Storm Labor Request" that contains the information that supports Interrogatory No. 124, in addition to Interrogatories Nos. 125,126 and 127.

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- 30.** Please provide a copy of all documents that you rely on to support your answers to interrogatory 125.
- A.** See document provided in Production of Documents No. 29 of this set.

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- 31.** Please provide a copy of all documents that you rely on to support your answers to interrogatory 126.
- A.** See document provided in Production of Documents No. 29 of this set.

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- 32.** Please provide a copy of all documents that you rely on to support your answers to interrogatory 127.
- A.** See document provided in Production of Documents No. 29 of this set.