

**BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION**

**In re: Petition for recovery of costs associated)
with named tropical systems during the 2015,)
2016, and 2017 hurricane seasons and)
replenishment of storm reserve subject to)
final true-up, Tampa Electric Company.)**

**DOCKET NO. 20170271-EI
FILED: JUNE 19, 2018**

**TAMPA ELECTRIC COMPANY'S
ANSWERS TO FIRST SET OF INTERROGATORIES (NOS. 1-7)
OF
FLORIDA PUBLIC SERVICE COMMISSION STAFF**

Tampa Electric files this its Answers to Interrogatories (Nos. 1-7) propounded and served on June 4, 2018 by the Florida Public Service Commission Staff.

TAMPA ELECTRIC COMPANY
DOCKET NO. 20170271-EI
INDEX TO STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-7)

<u>Number</u>	<u>Witness</u>	<u>Subject</u>	<u>Bates Stamped Page</u>
1	Young	Please refer to Exhibit D of TECO's Petition. a. Please explain what the Material & Supplies Expense and the M&S Inventory Issue line items include. b. Please explain what kind of costs are included as Outside Service – Services Expenses.	1
2	Chasse	Please refer to TECO's response to OPC Interrogatory Nos. 4 and 11. a. Does the overhead conductor amount in response to Interrogatory No. 11 include the feeder overhead plus the lateral overhead amounts? b. The capital overhead conductor in response to Interrogatory No. 4, for Hurricane Hermine is 10,202 feet less than the amount in response to Interrogatory No. 11. Please explain why the two amounts are different. c. In response to Interrogatory No. 4, TECO listed six overhead conductors as needing replacement after Hurricane Matthew; however, there are no capital costs for Hurricane Matthew included in TECO's response to Interrogatory No. 11. Please explain why no costs were included in response to Interrogatory No. 11.	2
3	Chasse	Please refer TECO's responses to OPC Interrogatory, Nos. 10 and 15. Please explain why the number of poles listed in response to response to Interrogatory No. 10 is not the same as the number listed in response to Interrogatory No. 15.	3
4	Young	Please refer to Exhibit D of TECO's Petition and TECO's response to OPC Interrogatory No. 29. Please explain why Exhibit D shows \$6,481,000 charged to Line Clearance Contractors for Hurricane Irma differs from the invoices provided in response to Interrogatory No. 29 which total \$6,407,734 for Hurricane Irma.	4
5	Chronister	Please refer to Exhibit D of TECO's Petition and TECO's response to OPC Interrogatory No. 33. Please explain what line item on Exhibit D the invoices in response to Interrogatory No. 33 are charged to.	5

6	Chronister	Please refer to Exhibit D of TECO's Petition and TECO's response to OPC Interrogatory No. 34. Please explain why the amount listed for Hurricane Irma in response to Interrogatory No. 34 is not the same as the amount listed on Exhibit D.	6
7	Chronister	Please refer to Exhibit D of TECO's Petition and TECO's response to Interrogatory No. 35. Please explain why the amount listed for Hurricanes Hermine, Matthew, and Irma in response to Interrogatory No. 35 are not the same as the amount listed on Exhibit D.	7

Gerard Chasse
Vice President, Electric Delivery

Jeff Chronister
Controller, Accounting

Beth Young
Director, Asset Management & System Planning

Tampa Electric Company
702 N. Franklin Street
Tampa, Florida 33602

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20170271-EI
STAFF'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 1
PAGE 1 OF 1
FILED: JUNE 19, 2018**

- 1.** Please refer to Exhibit D of TECO's Petition.
 - a. Please explain what the Material & Supplies Expense and the M&S Inventory Issue line items include.
 - b. Please explain what kind of costs are included as Outside Service – Services Expenses.

- A.**
 - a. Material & Supplies (“M&S”) Expense and the M&S Inventory Issue line items include the purchase of fuel, items needed for the incident bases and items required to complete restoration.
 - b. Outside services expenses include costs associated with foreign and native crews assisting with restoration efforts, including line work, damage assessment, security and outside services related to maintaining incident bases such as ice and sanitation.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20170271-EI
STAFF'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 2
PAGE 1 OF 1
FILED: JUNE 19, 2018**

2. Please refer to TECO's response to OPC Interrogatory Nos. 4 and 11.
- a. Does the overhead conductor amount in response to Interrogatory No. 11 include the feeder overhead plus the lateral overhead amounts?
 - b. The capital overhead conductor in response to Interrogatory No. 4, for Hurricane Hermine is 10,202 feet less than the amount in response to Interrogatory No. 11. Please explain why the two amounts are different.
 - c. In response to Interrogatory No. 4, TECO listed six overhead conductors as needing replacement after Hurricane Matthew; however, there are no capital costs for Hurricane Matthew included in TECO's response to Interrogatory No. 11. Please explain why no costs were included in response to Interrogatory No. 11.
- A.
- a. Yes, the overhead conductor amount in response to OPC Interrogatory No. 11 that was filed on April 9, 2018 includes the feeder and lateral overhead amounts.
 - b. The overhead conductor response to OPC Interrogatory No. 4 that was filed on April 9, 2018 for Hurricane Hermine captures the number of conductor locations the company determined were "impacted" by the storm and not the actual amount in distance. However, in OPC Interrogatory No. 11, Tampa Electric used the data from the company's material and financial systems to determine the amount of conductor that was issued during Hurricane Hermine. Consequently, the company shows 82 locations that were impacted by Hurricane Hermine and 10,284 feet of conductor issued from stock for replacement.
 - c. Tampa Electric significantly benefitted from Hurricane Matthew's track which kept the storm just offshore of the east coast of Florida. Hurricane Matthew's impact on the company's electrical system was minimal and Tampa Electric was able to quickly restore any outages that occurred. Much like a typical summer afternoon thunderstorm. The capital expenses incurred during Hurricane Matthew were charged to regular storm blanket accounts. In the response to OPC Interrogatory No. 4 that was filed on April 9, 2018 for Hurricane Matthew, the number of locations that were impacted, six overhead laterals, were listed and not the amount.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20170271-EI
STAFF'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 3
PAGE 1 OF 1
FILED: JUNE 19, 2018**

3. Please refer TECO's responses to OPC Interrogatory, Nos. 10 and 15. Please explain why the number of poles listed in response to response to Interrogatory No. 10 is not the same as the number listed in response to Interrogatory No. 15.
- A. During Hurricanes Hermine and Matthew, Tampa Electric was able to use outage data to determine the number of poles that were replaced during the actual storm time period. These numbers are accurately captured in the company's response to OPC Interrogatory No. 10 that was filed on April 9, 2018. The data in response to OPC Interrogatory No. 15 for Hurricanes Matthew and Hermine is retrieved from material and financial systems which captures data over a 24-hour period.

During Hurricane Irma and the magnitude of the storm, Tampa Electric placed priority on restoring customers safely and quickly and not on tracking and capturing actual equipment damage. To do so would have hampered and slowed the restoration efforts. The magnitude of damage created by Hurricane Irma also made it difficult to precisely determine the amount of system equipment and materials replaced. In the company's response to OPC Interrogatory No. 10, Tampa Electric confidently stated that there were 165 poles replaced based upon the number of damage prevention locate tickets generated. However, in the company's material and financial system showed that there were 414 poles issued during the period associated with damage related to Hurricane Irma. 219 of these 414 poles are poles that are used for distribution construction and the other 195 poles are used for lighting poles. Tampa Electric believes that some of the 54 poles (difference between 219 poles and 165 poles) were used for jobs associated with normal distribution work and is confident that the actual poles that were replaced as a result of damage due to Hurricane Irma is closer to 165 poles. This difference in pole count has been identified as a lesson learned and the company is seeking process changes and improvements which will assist in accurately capturing system damage related to significant storm events like Hurricane Irma.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20170271-EI
STAFF'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 4
PAGE 1 OF 1
FILED: JUNE 19, 2018**

- 4.** Please refer to Exhibit D of TECO's Petition and TECO's response to OPC Interrogatory No. 29. Please explain why Exhibit D shows \$6,481,000 charged to Line Clearance Contractors for Hurricane Irma differs from the invoices provided in response to Interrogatory No. 29 which total \$6,407,734 for Hurricane Irma.

- A.** Tampa Electric filed an estimated amount on December 28, 2017 for line clearance costs on Exhibit D associated with Hurricane Irma in the amount of \$6,480,544 (unrounded). Tampa Electric updated the line clearance costs associated with Hurricane Irma in the amount of \$6,406,085, after receiving all final line clearance invoices, on Exhibit D of the modified petition that was filed on January 31, 2018. This is the same amount that was provided in the Direct Testimony of Jeffrey S. Chronister's Exhibit JSC-1, Document No. 8. The company researched the difference between the \$6,406,085 and what the company provided as Response No. 29 to OPC's First set of Interrogatories (\$6,407,734) that was filed on April 9, 2018. Tampa Electric found that two transposition errors had occurred in the development of that response. The two errors were double counting of one invoice and a number transposition on one other invoice which accounts for the difference of \$1,649.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20170271-EI
STAFF'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 5
PAGE 1 OF 1
FILED: JUNE 19, 2018**

- 5.** Please refer to Exhibit D of TECO's Petition and TECO's response to OPC Interrogatory No. 33. Please explain what line item on Exhibit D the invoices in response to Interrogatory No. 33 are charged to.

- A.** The invoices in response to OPC Interrogatory No.33 that was filed on April 9, 2018 are charged to line 4 of Exhibit D of the company's Petition.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20170271-EI
STAFF'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 6
PAGE 1 OF 1
FILED: JUNE 19, 2018**

- 6.** Please refer to Exhibit D of TECO's Petition and TECO's response to OPC Interrogatory No. 34. Please explain why the amount listed for Hurricane Irma in response to Interrogatory No. 34 is not the same as the amount listed on Exhibit D.
 - A.** The amount listed for Hurricane Irma in response to OPC Interrogatory No. 34 that was filed on April 9, 2018 is different than the amount listed on Exhibit D of the company's Petition is due to one fuel invoice. Tampa Electric has been collaborating with a fuel vendor in which the company disagreed with the total amount of the fuel invoice. The vendor agreed that the fuel invoice was inaccurate and reduced the amount of the invoice which is reflected in this variance.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20170271-EI
STAFF'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 7
PAGE 1 OF 1
FILED: JUNE 19, 2018**

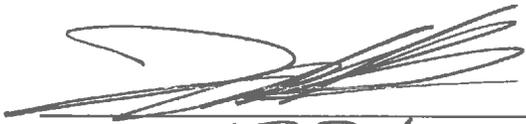
7. Please refer to Exhibit D of TECO's Petition and TECO's response to Interrogatory No. 35. Please explain why the amount listed for Hurricanes Hermine, Matthew, and Irma in response to Interrogatory No. 35 are not the same as the amount listed on Exhibit D.
 - A. The amounts listed for Hurricanes Hermine, Matthew and Irma in response to OPC Interrogatory No. 35 that was filed on April 9, 2018 are the same. The difference is just due to rounding on how the numbers were presented.

A F F I D A V I T

STATE OF FLORIDA)
)
COUNTY OF HILLSBOROUGH)

Before me the undersigned authority personally appeared who deposed and said that he is a Manager, Rates, Tampa Electric Company, and that the individuals listed in Tampa Electric Company's response to Staff's First Set of Interrogatories, (Nos. 1-7) prepared or assisted with the responses to these interrogatories to the best of his information and belief.

Dated at Tampa, Florida this 15 day of June, 2018.


_____ 6/15/18
MARK R. Roche

Sworn to and subscribed before me this 15th day of June, 2018.



My Commission expires _____

