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STATE OF FLORIDA



DIVISION OF ENGINEERING  
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# Public Service Commission

March 28, 2025

Mr. J. Jeffry Wahlen  
Ausley Law Firm  
Post Office Box 391  
Tallahassee, FL 32302  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)

## STAFF'S FIRST DATA REQUEST VIA EMAIL

**Re: Docket No. 20250036-EI - Petition for approval of purchased power agreement between Tampa Electric Company and Hillsborough County.**

Dear Mr. Wahlen:

By this letter, the Commission staff requests that Tampa Electric Company (TECO or Company) provide responses to the following data request:

1. Please explain why TECO elected to initially purchase 16 megawatts (MW) of firm capacity, given the facility is capable of producing 47 MW.
2. Please explain how the 90 percent monthly availability value was determined and how it compares to TECO's 2024 and 2025 Standard Offer Contract's (SOC) billing capacity factor calculation.
3. Please provide a comparison of what the terms of default are for the Purchased Power Agreement (PPA) versus the 2024 and 2025 SOC's, including the 70 percent monthly availability threshold.
4. Please explain how any costs and benefits associated with the environmental attributes and/or Renewable Energy Credits (RECs) from the PPA will be accounted for. As part of your response, explain what costs or benefits would be passed on to ratepayers and through what mechanism (such as base rates or the Fuel Clause).
5. Please refer to paragraph 21 of TECO's petition. Provide a copy of the analysis used to determine the \$3.1 to \$11.6 million customer savings value. As part of this response, please provide supporting documents and describe what sensitivities the Company conducted for the range of values and why it selected them.

6. Please refer to Exhibit 1, Section 5 on page 16.
  - a. Explain if a transmission study could be required as a result of the PPA. If so, provide the estimated cost of a transmission study, explain whether it was included in the Company's cost-effectiveness analysis, and how TECO would seek cost recovery for the transmission study.
  - b. If transmission upgrades are required and TECO pays for such, explain how TECO could seek cost recovery for those expenses, and the Commission could review the Company's decision.
7. To the extent payments made under the PPA exceed the energy-only amounts of TECO's 2024 and 2025 SOC's, detail the security under the PPA for these early capacity payments as required by Rule 25-17.0832(3)(c), Florida Administrative Code. As part of this response, provide the annual and cumulative value of early capacity payment security under the contract compared to the 2024 and 2025 SOC's for the life of the contract.
8. Please provide the Company's annual seasonal Reserve Margins over the period of the contract with and without the PPA, in MW and as a percent of net firm peak demand.
9. Please provide a comparison of the expected energy payments under the PPA with TECO's approved 2024 SOC. Complete the table below by providing the annual value of payments, in nominal and net present value, for PPA energy payments, SOC energy payments, SOC capacity payments, the net differential, and the cumulative differential of payments in table in Excel format.
  - a. Please provide a version of this based on a low fuel price, high fuel price, and assuming Hillsborough increases its firm capacity to 35 MW.
10. Please provide a comparison of the expected energy payments under the PPA with TECO's pending 2025 SOC. Complete the table on the next page by providing the annual value of payments, in nominal and net present value, for PPA energy payments, SOC energy payments, SOC capacity payments, the net differential, and the cumulative differential of payments in table in Excel format.
  - a. Please provide a version of this based on a low fuel price, high fuel price, and assuming Hillsborough increases its firm capacity to 35 MW.

J. Jeffry Wahlen

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PPA vs (2024 or 2025) Standard Offer Contract - (Base Case / Low Fuel / High Fuel / Up-rated Capacity) – (Nominal or Real)

Year	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	Sum
PPA Energy (MWh)												
PPA Capacity (MW)												
PPA Energy Payments (\$)												
PPA Total Payments (\$)												
SOC Capacity Payment (\$)												
SOC Energy Payments (\$)												
SOC Total Payments (\$)												
Annual Payment Differential (\$)												
Cumul Payment Differential (\$)												

Please file all responses electronically no later than **Monday, April 14, 2025**, via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form (reference Docket No. 20250036-EI). In addition, please email the filed response to [discovery-gcl@psc.state.fl.us](mailto:discovery-gcl@psc.state.fl.us). Please contact me by phone at (850) 413-6686 or by email at [owooten@psc.state.fl.us](mailto:owooten@psc.state.fl.us), if you have any questions.

Sincerely,

*s/ Orlando Wooten*

Orlando Wooten  
Engineering Specialist

OW:da

cc: Office of Commission Clerk (Docket No. 20250036-EI)  
Malcolm N. Means - [mmeans@ausley.com](mailto:mmeans@ausley.com)  
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