AUSLEY & MCMULLEN

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October 15, 2003

HAND DELIVERED

Ms. Blanca S. Bayo, Director Division of Commission Clerk and Administrative Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

> Fuel and Purchased Power Cost Recovery Clause with Generating Performance Re: Incentive Factor: FPSC Docket No. 030001-EI

Dear Ms. Bayo:

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Enclosed for filing in the above docket are the original and ten (10) copies of Tampa Electric Company's Prehearing Statement.

Also enclosed is a diskette containing the above document generated in Word and saved in Rich Text format for use with WordPerfect.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning same to this writer.

Thank you for your assistance in connection with this matter.

Sincerely,

James D. Beasley

JDB/pp Enclosures

All Parties of Record (w/enc.) cc:

> LINE PROPERTY 10075 OCT 158 HAR-CUMMISSIUM CLERI

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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In re: Fuel and Purchased Power Cost Recovery Clause And Generating Performance Incentive Factor.

DOCKET NO. 030001-EI FILED: October 15, 2003

TAMPA ELECTRIC COMPANY'S <u>PREHEARING STATEMENT</u>

A. APPEARANCES:

.

LEE L. WILLIS JAMES D. BEASLEY Ausley & McMullen Post Office Box 391 Tallahassee, Florida 32302 <u>On behalf of Tampa Electric Company</u>

B. WITNESSES:

	Witness	Subject Matter	Issues
(<u>Di</u>	<u>rect</u>)		
1.	J. Denise Jordan (TECO)	Fuel Adjustment True-up and Projections	1, 2, 3, 4, 5, 6, 7. 8, 9
		Capacity Cost Recovery True-up and Projections	24, 25, 26, 27, 28, 29
		Proposed Wholesale Incentive Benchmark	10, 11
		Replacement Fuel Costs Due to Shutdown of Gannon Units 1 Through 4	171
		Regulatory Treatment of Gains or Losses for Surplus Coal Resale	17J

		Regulatory Treatment of Dead Freight Coal Transportation Costs	17K
		Incremental Costs of Security Measures Following September 11, 2001 Attacks	30, 34A
2.	William A. Smotherman (TECO)	GPIF Reward/Penalty and Targets/Ranges	18, 19, 23A
		Replacement Fuel Costs Due to Shutdown of Gannon Units 1 Through 4	171
3.	Benjamin F. Smith (TECO)	Tampa Electric's Wholesale Purchases and Sales Activities	17C
		Replacement Fuel Costs Due to Shutdown of Gannon Units 1 Through 4	17I
4.	William T. Whale (TECO)	Shutdown of Gannon Units 1 Through 4	17I
5.	Joann T. Wehle (TECO)	Hedging Program Activities and Incremental Operating and Maintenance Expenses	12, 17C, 17D
		Affiliated Coal Transportation Costs	17A. 17B
		Coal Transportation Market Price and Cost Recovery	17E, 17F
		Tampa Electric's Waterborne Coal Transportation Benchmark	17G, 17H
		Replacement Fuel Costs Due to Shutdown of Gannon Units 1 Through 4	17I
6.	Brent Dibner (On behalf of TECO)	Coal Transportation Market Price	17E

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Tampa Electric`s Waterborne17GCoal Transportation Benchmark

C. EXHIBITS:

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<u>Exhibit</u>	Witness	Description
(JDJ-1)	Jordan	Fuel Cost Recovery January 2002 - December 2002
(JDJ-1)	Jordan	Capacity Cost Recovery January 2002 – December 2002
(JDJ-2)	Jordan	Fuel Cost Recovery, Projected January 2003 – December 2003
(JDJ-2)	Jordan	Capacity Cost Recovery, Projected January 2003 – December 2003
(JDJ-3)	Jordan	Fuel Cost Recovery, Projected January 2004 – December 2004
(JDJ-3)	Jordan	Capacity Cost Recovery, Projected January 2004 – December 2004
(WAS-1)	Smotherman	Generating Performance Incentive Factor Results January 2002 – December 2002
(WAS-2)	Smotherman	Generating Performance Incentive Factor Estimated January 2004 – December 2004
(WTW-1)	Whale	Gannon Station Performance and Reliability
(JTW-1)	Wehle	2002 Incremental Hedging Operations and Maintenance Costs Calculation
(JTW-2)	Wehle	2002 Transportation Benchmark Calculation 2002 Coal Transportation Market Price Application
(JTW-2)	Wehle	2004 Projected Incremental Hedging Operations And Maintenance Costs
(BD-1)	Dibner	Assessment of Market Waterborne Transportation Rates 3

D. STATEMENT OF BASIC POSITION

Tampa Electric Company's Statement of Basic Position:

The Commission should approve Tampa Electric's calculation of its fuel adjustment, capacity cost recovery and GPIF true-up and projection calculations, including the proposed fuel adjustment factor of 3.967 cents per KWH before application of factors which adjust for variations in line losses; the proposed capacity cost recovery factor of 0.216 cents per KWH before applying the 12CP and 1/13th allocation methodology: a GPIF penalty of \$2,496,021 and approval of the company's proposed GPIF targets and ranges for the forthcoming period. Tampa Electric also requests approval of its calculated wholesale incentive benchmark of \$1,261,681 for calendar year 2004.

E. STATEMENT OF ISSUES AND POSITIONS

Generic Fuel Adjustment Issues

<u>Issue 1</u> :	What are the appropriate final fuel adjustment true-up amounts for the period	
	January 2002 through December 2002?	
TECO:	\$28,662,327 under-recovery. (Witness: Jordan)	
Issue 2:	What are the appropriate estimated fuel adjustment true-up amounts for the period	
	January 2003 through December 2003?	
TECO:	\$88,345,118 under-recovery. (Witness: Jordan)	
Issue_3:	What are the appropriate total fuel adjustment true-up amounts to be	
	collected/refunded from January 2004 to December 2004?	
TECO:	Because the Commission authorized Tampa Electric to recovery \$26,000,000 of	
	its final 2002 true-up amount during the mid-course period April 2003 through 4	

December 2003, the appropriate total fuel adjustment true-up amount to be collected/refunded from January 2004 to December 2004 is \$91,007,445 under-recovery. (Witness: Jordan)

- Issue 4: What is the appropriate revenue tax factor to be applied in calculating each investor-owned electric utility's levelized fuel factor for the projection period January 2004 through December 2004?
- <u>TECO</u>: The appropriate revenue tax factor is 1.00072. (Witness: Jordan)
- Issue 5: What are the appropriate projected net fuel and purchased power cost recovery amounts to be included in the recovery factor for the period January 2004 through December 2004?
- TECO: The projected net fuel and purchased power cost recovery amount to be included in the recovery factor for the period January 2004 through December 2004, adjusted by the jurisdictional separation factor, is \$655,445.508. The total recoverable fuel and purchased power cost recovery amount to be collected, including the true-up and GPIF amounts and adjusted for the revenue tax factor, is \$744,494,377. (Witness: Jordan)
- Issue 6: What are the appropriate levelized fuel cost recovery factors for the period January 2004 through December 2004?
- <u>TECO</u>: The appropriate factor is 3.967 cents per KWH before the normal application of factors that adjust for variations in line losses. (Witness: Jordan)
- Issue 7: What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class / delivery voltage level class?

<u>TECO</u>: The appropriate fuel recovery line loss multipliers are as follows:

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Rate Schedule	Fuel Recovery Loss Multiplier
RS, GS and TS	1.0043
RST and GST	1.0043
SL-2, OL-1 and OL-3	N/A
GSD, GSLD, and SBF	1.0005
GSDT. GSLDT, EV-X and SBFT	1.0005
IS-1, IS-3, SBI-1, SBI-3	0.9745
IST-1, IST-3, SBIT-1. SBIT-3	0.9745
(Witness: Jordan)	

Issue 8: What are the appropriate fuel cost recovery factors for each rate class / delivery voltage level class adjusted for line losses?

<u>TECO</u>: The appropriate factors are as follows:

Rate Schedule	Fuel Charge Factor (cents per kWh)
Average Factor	3.967
RS, GS and TS	3.984
RST and GST	4.999 (on-peak)
	3.460 (off-peak)
SL-2, OL-1 and OL-3	3.691
GSD, GSLD, and SBF	3.969
GSDT, GSLDT, EV-X and SBFT	4.980 (on-peak)
	3.447 (off-peak)
IS-1, IS-3, SBI-1. SBI-3	3.866

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(Witness: Jordan)

<u>Issue 9</u>: What should be the effective date of the fuel adjustment charge and capacity cost recovery charge for billing purposes?

- TECO: The new factors should be effective beginning with the specified billing cycle and thereafter for the period January 2004 and thereafter through the last billing cycle for December 2004. The first billing cycle may start before January 1, 2004, and the last billing cycle may end after December 31, 2004, so long as each customer is billed for 12 months regardless of when the factors became effective. (Witness: Jordan)
- <u>Issue 10</u>: What are the appropriate actual benchmark levels for calendar year 2003 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

<u>TECO</u>: \$1.546,058. (Witness: Jordan)

- Issue 11: What are the appropriate estimated benchmark levels for calendar year 2004 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?
- <u>TECO</u>: \$1.261.681. (Witness: Jordan)
- Issue 12: What is the appropriate base level for operation and maintenance expenses for non-speculative financial and/or physical hedging programs to mitigate fuel and purchased power price volatility?
- <u>TECO</u>: \$169,153. (Witness: Wehle)

Company-Specific Fuel Adjustment Issues

Progress Energy Florida

Issue 13A: Has Progress Energy Florida confirmed the validity of the methodology used to determine the equity component of Progress Fuels Corporation's capital structure for calendar year 2002?

<u>TECO</u>: No position.

Issue 13B: Has Progress Energy Florida properly calculated the market price true-up for coal purchases from Powell Mountain?

TECO: No position.

- <u>Issue 13C</u>: Has Progress Energy Florida properly calculated the 2002 price for waterborne transportation services provided by Progress Fuels Corporation?
- <u>TECO</u>: No position.
- Is the waterborne coal transportation market price proxy that was established by Order No. PSC-93-1331-FOF-EI, issued September 13, 1993, in Docket No. 930001-EI, still a relevant and sufficient means for assessing the prudence of transportation costs paid by Progress Energy Florida to its affiliate, Progress Fuels?

TECO: No position.

Issue 13E: Should the Commission modify or eliminate the method for calculating Progress Energy Florida's market price proxy for waterborne coal transportation that was established by Order No. PSC-93-1331-FOF-EI, issued September 13, 1993, in Docket No. 930001-EI?

<u>TECO</u>: No position.

- <u>Issue 13F</u>: Were Progress Energy Florida's actions through December 31, 2002, to mitigate fuel and purchased power price volatility through implementation of its non-speculative financial and/or physical hedging programs prudent?
- TECO: No position.
- Issue 13G: Are Progress Energy Florida's actual and projected operation and maintenance expenses for 2002 through 2004 for its non-speculative financial and/or physical hedging programs to mitigate fuel and purchased power price volatility reasonable for cost recovery purposes?
- TECO: No position.
- Issue 13H: In consideration of Order No. PSC-93-1331-FOF-EI, in Docket No. 930001-EI, issued September 13, 1993, should the Commission make an adjustment to Progress Energy Florida's 2002 waterborne coal transportation costs to account for upriver costs from mine to barge for coal commodity contracts which are quoted FOB Barge?
- TECO: No position.

Florida Power & Light Company

- Issue 14A: Were Florida Power & Light's actions through December 31. 2002, to mitigate fuel and purchased power price volatility through implementation of its non-speculative financial and/or physical hedging programs prudent?
- TECO: No position.
- Issue 14B: Are Florida Power & Light's actual and projected operation and maintenance expenses for 2002 through 2004 for its non-speculative financial and/or physical

hedging programs to mitigate fuel and purchased power price volatility reasonable for cost recovery purposes?

TECO: No position.

Florida Public Utilities Company

No issues have been identified at this time.

Gulf Power Company

Issue 16A: Were Gulf Power's actions through December 31, 2002, to mitigate fuel and purchased power price volatility through implementation of its non-speculative financial and/or physical hedging programs prudent?

<u>TECO</u>: No position.

- Issue 16B: Are Gulf Power's actual and projected operation and maintenance expenses for 2002 through 2004 for its non-speculative financial and/or physical hedging programs to mitigate fuel and purchased power price volatility reasonable for cost recovery purposes?
- <u>TECO</u>: No position.

Tampa Electric Company

- Issue 17A: What is the appropriate 2002 waterborne coal transportation benchmark price for transportation services provided by affiliates of Tampa Electric Company?
- TECO: \$23.87 / Ton. (Witness: Wehle)
- <u>Issue 17B</u>: Has Tampa Electric Company adequately justified any costs associated with transportation services provided by affiliates of Tampa Electric Company that exceed the 2002 waterborne transportation benchmark price?

- <u>TECO:</u> Because the actual affiliated coal transportation cost for 2002 fell below the waterborne transportation benchmark price, no such justification is necessary. (Witness: Wehle)
- <u>Issue 17C:</u> Were Tampa Electric's actions through December 31, 2002, to mitigate fuel and purchased power price volatility through implementation of its non-speculative financial and/or physical hedging programs prudent?
- <u>TECO:</u> Yes. Tampa Electric diligently manages its fuel supply portfolio and engages in physical and financial hedging designed to minimize overall fuel costs while maintaining a reliable supply of fuels. During 2003, Tampa Electric followed the non-speculative financial hedging plan approved by its Risk Authorizing Committee, and as the company's use of natural gas increases in 2004, Tampa Electric will continue to refine its risk management and hedging plan with these changes in mind. (Witness: Wehle, Smith)
- <u>Issue 17D:</u> Are Tampa Electric's actual and projected operation and maintenance expenses for 2002 through 2004 for its non-speculative financial and/or physical hedging programs to mitigate fuel and purchased power price volatility reasonable for cost recovery purposes?
- TECO: Yes. Tampa Electric included \$83,786 and \$190,847 in actual and estimated incremental hedging operations and maintenance costs in its 2002 actual true-up calculation and 2003 actual/estimated filing, respectively. The company expects its 2004 total incremental hedging operations and maintenance costs to be \$280,847. These amounts were or are expected to be spent to implement the company's non-speculative hedging programs to mitigate fuel and purchased

power price volatility as authorized by the Commission in Order No. PSC-02-1484-FOF-EI, and they are therefore reasonable for cost recovery purposes. (Witness: Wehle)

- Issue 17E: Is Tampa Electric's June 27, 2003, request for proposals sufficient to determine the current market price for coal transportation?
- <u>TECO:</u> Yes. Using the bids received in response to the RFP and market analyses provided by Tampa Electric's consultant, Tampa Electric has demonstrated that the prices established by bid(s) or by market modeling represent the market for the transportation services that will be provided under the new contract that begins January 1. 2004. (Witness: Wehle, Dibner)
- Issue 17F: Are Tampa Electric's projected coal transportation costs for 2004 through 2008 under the winning bid to its June 27, 2003, request for proposals for coal transportation reasonable for cost recovery purposes?
- <u>TECO:</u> At the time that Tampa Electric filed its 2004 projection filing, the rates for the transportation contract that takes effect January 1. 2004 had not yet been established. Therefore, Tampa Electric used its best estimate of the cost, which has since been shown to be close to the market rates established for the new contract. As is always the case, the projected values will be trued-up to reflect actual costs, ensuring that ratepayers pay only the actual costs of transportation services. Therefore, Tampa Electric's projected coal transportation costs for 2004 are reasonable for cost recovery purposes. (Witness: Wehle)
- Is the waterborne coal transportation benchmark that was established by Order No. PSC-93-0443-FOF-EI, issued March 23, 1993, in Docket No. 930001-EI, still

a relevant and sufficient means for assessing the prudence of transportation costs paid by Tampa Electric Company to its affiliate, TECO Transport?

- <u>TECO:</u> Yes. The Commission-established average rail rate comparison serves as a reasonable market proxy for waterborne transportation costs. This benchmark is the best alternative for comparison currently available. (Witness: Wehle, Dibner)
- Issue 17H: Should the Commission modify or eliminate the waterborne coal transportation benchmark that was established for Tampa Electric in Order No. PSC-93-0443-FOF-EI, issued March 23, 1993, in Docket No. 930001-EI?
- <u>TECO:</u> No. The Commission-established rail rate comparison is the best alternative for comparison currently available. In addition, to date Tampa Electric has always been able to collect the verifiable information necessary to calculate the benchmark for timely filing with the Commission. (Witness: Wehle)
- Issue 17I: Are the replacement fuel costs associated with Tampa Electric's decision to cease operations at its Gannon Units 1 through 4 prior to December 31, 2004, reasonable?
- <u>TECO:</u> Yes. Tampa Electric's units are operated to provide safe, reliable electric service to ratepayers, and the company procures the fuel to operate all units based on their economic dispatch. In addition, Tampa Electric follows its Commission-reviewed fuel procurement policies and procedures. Finally, Tampa Electric's decision to shut down Gannon Units 1 through 4 in 2003 was arrived at only after careful and deliberate evaluation of many dynamic and complex factors. Costs for replacement fuel due to the shutdown of Gannon Units 1 through 4 in 2003 were

prudently incurred and are reasonable for cost recovery purposes. (Witness: Jordan. Smotherman, Smith, Whale, Wehle)

- Issue 17J: What is the appropriate regulatory treatment for any gain or loss on the re-sale of surplus coal due to Tampa Electric's decision to cease operations at its Gannon Units 1 through 4 prior to December 31, 2004?
- TECO: Tampa Electric currently expects the impact on ratepayers to be neutral, and there remains the potential for ratepayers to experience net gains. The company's projected 2004 fuel and purchased power costs do not include any gains or losses on the resale of surplus coal; however, if there are any gains or losses the appropriate regulatory treatment would be to pass the gains or losses through the Fuel and Purchased Power Cost Recovery Clause. (Witness: Jordan)
- Issue 17K: What is the appropriate regulatory treatment for any "dead-freight" coal transportation costs due to Tampa Electric's decision to cease operations at its Gannon Units 1 through 4 prior to December 31, 2004?
- TECO: Tampa Electric will not incur dead freight costs for coal transportation related to the shutdown of Gannon Units 1 through 4, and the company's projected 2004 fuel and purchased power costs did not include any dead freight costs. Therefore, this issue is moot. (Witness: Jordan)
- Issue 17L: Should the Commission offset Tampa Electric's requested fuel cost increase by the O&M savings that resulted from its decision to cease operations at its Gannon Units 1 through 4 prior to December 31, 2004?
- <u>TECO:</u> This FIPUG issue is inappropriate for inclusion in this proceeding and should be rejected. This issue was not identified by Staff. Instead, it is an erroneous effort

by FIPUG to inject a base rate setting concept into the fuel and purchased power cost recovery proceeding.

- Issue 17M: Should the Commission review the amounts paid to Hardee Power Partners (HPP) under the power purchase agreement to assure that the costs were cost-based due to the recognition of a gain on the sale of the Hardee Power Station which was supported by the power purchase agreement?
- TECO: This FIPUG issue is inappropriate for inclusion in this proceeding and should be rejected. This issue was not identified by Staff. but simply represents an erroneous effort by FIPUG to examine a non-jurisdictional transaction for the sole purpose of delay.
- Issue 17N: Should the Commission review the HPP power purchase agreement to assure that the change of ownership will not affect ratepayer costs due to the revised costs of the new owner?
- TECO: This FIPUG issue is inappropriate for inclusion in this proceeding and should be rejected. This issue was not identified by Staff but simply represents an erroneous effort by FIPUG to examine the effect of a non-jurisdictional transaction for the sole purpose of delay. Tampa Electric's power purchase from Hardee Power Partners has been reviewed and approved by the Commission on a number of occasions and the Commission's refusal to accept FIPUG's challenge of that purchase has been affirmed by the Supreme Court of Florida.
- <u>Issue 170:</u> Should the Commission review Tampa Electric's acquisition and subsequent cancellation of turbine purchase rights from TECO-Panda generating company?

TECO: This FIPUG issue is inappropriate for inclusion in this proceeding and should be rejected. It is an erroneous effort by FIPUG to address a base rate rsetting concept in the determination of cost recovery issues where there has been no allegation of any impact on fuel and purchased power cost recovery. This issue, like Issues 17L, 17M and 17N, does not constitute a legitimate cost recovery issue but, instead, is submitted by FIPUG solely for the purpose of delay.

Generic Generating Performance Incentive Factor Issues

- Issue 18: What is the appropriate generation performance incentive factor (GPIF) reward or penalty for performance achieved during the period January 2002 through December 2002 for each investor-owned electric utility subject to the GPIF?
- <u>TECO:</u> A penalty in the amount of \$2,496,021. (Witness: Smotherman)
- Issue 19: What should the GPIF targets/ranges be for the period January 2004 through December 2004 for each investor-owned electric utility subject to the GPIF?
- TECO: The appropriate targets and ranges are shown in the Exhibit to the prefiled testimony of Mr. William A. Smotherman. (Witness: Smotherman)

Company-Specific Generating Performance Incentive Factor Issues

Florida Power & Light

No issues have been identified at this time.

Progress Energy Florida

No issues have been identified at this time.

Gulf Power Company

No issues have been identified at this time.

Tampa Electric Company

- <u>Issue 23A:</u> What impact did Tampa Electric's decision to cease operations at its Gannon Units 1 through 4 prior to December 31, 2004, have on Tampa Electric's GPIF targets and ranges?
- <u>TECO:</u> Tampa Electric's decision had no impact on its GPIF targets and ranges. (Witness: Smotherman)

Generic Capacity Cost Recovery Factor Issues

- Issue 24: What are the appropriate final capacity cost recovery true-up amounts for the period January 2002 through December 2002?
- TECO: Under-recovery of \$314,462. (Witness: Jordan)
- <u>Issue 25</u>: What are the appropriate estimated capacity cost recovery true-up amounts for the period January 2003 through December 2003?
- TECO: Under-recovery of \$1,847,047. (Witness: Jordan)
- <u>Issue 26</u>: What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2004 through December 2004?
- TECO: Under-recovery of \$2,161,509. (Witness: Jordan)
- Issue 27: What are the appropriate projected net purchased power capacity cost recovery amounts to be included in the recovery factor for the period January 2004 through December 2004?
- <u>TECO:</u> The purchased power capacity cost recovery amount to be included in the recovery factor for the period January 2004 through December 2004, adjusted by the jurisdictional separation factor, is \$38,399,483. The total recoverable capacity

cost recovery amount to be collected, including the true-up amount and adjusted for the revenue tax factor, is \$40,590,196. (Witness: Jordan)

- <u>Issue 28</u>: What are the appropriate jurisdictional separation factors for capacity revenues and costs to be included in the recovery factor for the period January 2004 through December 2004?
- <u>TECO:</u> The appropriate jurisdictional separation factor is 0.9543611. (Witness: Jordan)
- Issue 29: What are the appropriate capacity cost recovery factors for the period January 2004 through December 2004?
- <u>TECO:</u> The appropriate factors are as follows:

Rate Schedule	Capacity Cost Recovery Factor (cents per kWh)
Average Factor	0.216
RS	0.267
GS and TS	0.244
GSD, EV-X	0.210
GSLD and SBF	0.185
IS-1, IS-3, SBI-1, SBI-3	0.016
SL-2, OL-1 and OL-3	0.105
(Witness: Jordan)	

<u>Issue 30</u>: What is the appropriate methodology for determining the incremental costs of security measures implemented as a result of terrorist attacks committed on or since September 11. 2001?

<u>TECO:</u> Tampa Electric's incremental operations and maintenance costs incurred for security measures implemented to protect the company's generating facilities as a

result of terrorist attacks committed on or since September 11, 2001 should continue to be separately recorded in accounts created specifically for capturing such expenses. With this treatment, incremental security operations and maintenance expenses are never commingled with the company's on-going security expenses. (Witness: Jordan)

Company-Specific Capacity Cost Recovery Factor Issues

Progress Energy Florida

- Issue 31A: Are Progress Energy Florida's actual and projected expenses for 2002 through 2004 for its post-September 11, 2001, security measures reasonable for cost recovery purposes?
- <u>TECO</u>: No position.

Florida Power & Light

- Issue 32A: Are Florida Power & Light's actual and projected expenses for 2002 through 2004 for its post-September 11, 2001, security measures reasonable for cost recovery purposes?
- <u>TECO</u>: No position.

Gulf Power Company

No issues have been identified at this time.

Tampa Electric Company

Issue 34A: Are Tampa Electric Company's actual and projected expenses for 2002 through 2004 for its post-September 11, 2001, security measures reasonable for cost recovery purposes?

<u>TECO</u>: Yes. Tampa Electric included \$722,441 for actual and projected incremental security operations and maintenance expenses for 2002 through 2004 that arose as a result of terrorist attacks committed on or since September 11, 2001. These expenses were directly caused by the extraordinary events of September 11, 2001 and the need for additional security measures to protect the company's facilities following the attacks. (Witness: Jordan)

F. STIPULATED ISSUES

<u>TECO:</u> None at this time.

G. MOTIONS

TECO:

H. OTHER MATTERS

TECO: None at this time.

DATED this <u>15</u> day of October 2003.

Respectfully submitted,

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LEE L. WILLIS JAMES D. BEASLEY Ausley & McMullen Post Office Box 392 Tallahassee, Florida 32302 (850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of Tampa Electric Company's Prehearing Statement has been furnished by U. S. Mail or hand delivery (*) on this *Log* day of October, 2003 to the following:

Mr. Wm. Cochran Keating, IV* Senior Attorney Division of Legal Services Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

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