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November 8, 2006

HAND DELIVERED

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

060733-E1

Re:

Petition of Tampa Electric Company to authorize the use of deferral accounting and the creation of a regulatory asset or regulatory liability to record charges or credits that would have otherwise been recorded in equity pursuant to the balance sheet treatment required by Statement of Financial Accounting Standards (SFAS) No. 158

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Petition to authorize the use of deferral accounting and the creation of a regulatory asset or regulatory liability to record charges or credits that would have otherwise been recorded in equity pursuant to the balance sheet treatment required by Statement of Financial Accounting Standards (SFAS) No. 158.

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 Enclosure

RECEIVED & FILED

FPSC-BUREAU OF RECONDS

DOCUMENT NUMBER-DATÉ

10315 NOV-88

FPSC-COMMISSION CLERK



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Tampa Electric Company)
to authorize the use of deferral accounting)
and the creation of a regulatory asset or)
regulatory liability to record charges or)
credits that would have otherwise been)
recorded in equity pursuant to the balance)
sheet treatment required by Statement of)
Financial Accounting Standards (SFAS))
No.158.)
)

DOCKET NO. <u>060733-E1</u> FILED: November 8, 2006

PETITION

Tampa Electric Company ("Tampa Electric" or "the company") hereby petitions the Commission for authorization to use deferral accounting and to create a regulatory asset or regulatory liability to record charges or credits that would have otherwise been recorded in equity pursuant to the balance sheet treatment required by Statement of Financial Accounting Standards SFAS No. 158 and, in support thereof, says:

- 1. Tampa Electric is an investor-owned electric utility subject to the jurisdiction of the Commission under Chapter 366, Florida Statutes. Tampa Electric's offices are located at 702 North Franklin Street, Tampa, Florida 33602.
- 2. Tampa Electric requests that copies of all pleadings, orders, notices and other documents submitted in this proceeding be furnished to the following:

Paula Brown Administrator, Regulatory Affairs Tampa Electric Company Post Office Box 111 Tampa, FL 33601 (813) 228-1934 (813) 228-1770 (fax) Lee L. Willis James D. Beasley Ausley & McMullen Post Office Box 391 Tallahassee, FL 32302 (850) 224-9115 (850) 222-7952 (fax)

DOCUMENT NUMBER - DATE

10315 NOV-88

- 3. The Financial Accounting Standards Board issued SFAS No. 158, Employers' Accounting for Defined Benefit Pension and Other Post-retirement Plans (an amendment of SFAS Nos. 87, 88, 106 and 132R) in late September 2006. SFAS Nos. 158 changes the requirements for balance sheet treatment for pension costs and also requires similar balance sheet treatment for other post-retirement benefits; previously, there was no minimum pension-type adjustment for other post-retirement benefits. SFAS No. 158 does not change expense recognition for pension and other post-retirement benefits. The reporting requirement changes must be made as of December 31, 2006.
- 4. Exhibit A describes the journal entries that are required to comply with SFAS No.

 158 and the journal entries for which Tampa Electric seeks the Commission's approval to create the regulatory asset or regulatory liability.

WHEREFORE, Tampa Electric respectfully requests that the Commission grant this Petition, in an expeditious manner such that a consummating order can be issued prior to year end 2006, and authorize the use of deferral accounting and the creation of a regulatory asset or regulatory liability to record charges or credits that would have otherwise been recorded in equity pursuant to the balance sheet treatment required by SFAS No. 158. Additionally, to satisfy certain generally accepted accounting principle requirements related to regulatory assets and liabilities, Tampa Electric respectfully requests that the Commission acknowledge that if amounts represented by the establishment of regulatory assets or liabilities pursuant to this order were to be recognized in expense through a future SFAS No. 88 or SFAS No. 106 curtailment,

settlement or termination event, the recognized costs would be includable as a cost of service for ratemaking or surveillance purposes, subject to the Commission's normal ability to review the amounts for reasonableness.

DATED this 8th day of November 2006.

Respectfully submitted,

LÉE L. WILLIS

JAMES D. BEASLEY

Ausley & McMullen

Post Office Box 391

Tallahassee, Florida 32302

(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

Exhibit A

Proposed Accounting Entries to Comply with FAS 158

The following journal entry would be made to record the unfunded liability for Pension, SERP and FAS 106. These unfunded liabilities represent the excess of the Projected Benefit Obligation (PBO – for Pension and SERP) and Accumulated Post-Retirement Benefit Obligation (APBO – for FAS 106) over the fair value of plan assets (pension plan only) and the recorded benefit liabilities currently on the books of the company.

		Dr.	Cr.
219	Accumulated other comprehensive income (after tax)	X	
182	Regulatory tax asset-FAS 158 related (tax effect)	X	
228	Liabilities for pension/SERP benefits		X
228	Liability for other post-retirement benefits (FAS 106)		X

The following journal entry would be made to reclassify the after-tax amounts charged from Accumulated Other Comprehensive Income to a Regulatory Asset.

		Dr.	Cr.
182	Regulatory asset – benefit related	X	
219	Accumulated other comprehensive income		X