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July 15, 2013

HAND DELIVERED

Ms. Ann Cole, Director  
Office of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

RECEIVED - FPSC  
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COMMISSION  
CLERK

Re: Petition for Rate Increase by Tampa Electric Company  
FPSC Docket No. 130040-EI

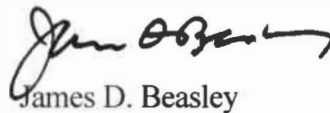
Dear Ms. Cole:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Preliminary List of Issues and Positions.

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

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

COM	_____
AFD	_____
APA	_____
ECO	_____ 12
ENG	_____
GCL	_____
IDM	_____
TEL	_____
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase )  
by Tampa Electric Company. )  
\_\_\_\_\_ )

DOCKET NO. 130040-EI

FILED: July 15, 2013

**TAMPA ELECTRIC COMPANY'S  
PRELIMINARY LIST OF ISSUES AND POSITIONS**

As prescribed in the case assignment and scheduling record in this proceeding, Tampa Electric Company ("Tampa Electric", "the company" or "TECO") submits the following as its preliminary list of issues and positions:

**TEST PERIOD**

**Issue 1:** Is TECO's projected test period of the 12 months ending December 31, 2014 appropriate?

**TECO:** Yes. The period January 1, 2014 through December 31, 2014 is appropriate for setting rates because it best represents expected future operations.

**Issue 2:** Are TECO's forecasts of Customers, KWH, and KW by Rate Class for the 2014 projected test year appropriate?

**TECO:** Yes. TECO's forecast of customer growth, energy sales and peak demand are appropriate. TECO uses proven econometric models and relies on reasonable assumptions in developing its forecasts.

**CALPINE**

**Issue 3:** How should the Calpine transmission contract renewal be treated for ratemaking purposes?

**TECO:** At the time of the filing it was appropriate to exclude the transmission revenues from Calpine as it was unknown if the contract would be extended. Since Calpine has elected to renew 249 MW of the transmission service the company now expects to collect \$4.93 million in incremental revenues. In its filing the company agreed to refund any difference between the revenues associated with 526 MW of firm service occurring during the first five months of 2014 and the amount collected under any renewed contract through the fuel clause. Additionally, the

load effects of renewing 249 MW of transmission service results in a \$763 thousand reduction on retail revenue requirements from jurisdictional separation. Therefore, the net reduction to retail revenue requirements associated with the Calpine contract renewal is \$5.69 million. All subsequent issues do not reflect the impact of the incremental revenues or separation impacts.

### **QUALITY OF SERVICE**

**Issue 4:** Is the quality of electric service provided by TECO adequate?

**TECO:** Yes. TECO has delivered quality transmission and distribution reliability service and customer service. The company's five year System Average Interruption Duration Index ("SAIDI") is the second lowest among the investor-owned utilities in Florida and its annual SAIDI is in the top quartile reliability results when compared to other southeastern utilities.

### **RATE BASE**

**Issue 5:** Has TECO removed all non-utility activities from rate base?

**TECO:** Yes, the company has removed all non-utility activities from rate base.

**Issue 6:** Is TECO's requested level of Plant in Service in the amount of \$6,506,194,000 for the 2014 projected test year appropriate?

**TECO:** Yes. TECO has properly forecasted this amount for Plant in Service and it is appropriate.

**Issue 7:** Is TECO's requested level of accumulated depreciation in the amount of \$2,436,895,000 for the 2014 projected test year appropriate?

**TECO:** Yes. TECO has properly forecasted this amount for accumulated depreciation and it is appropriate.

**Issue 8:** Have all costs recovered through the Environmental Cost Recovery Clause been removed from rate base for the 2014 projected test year?

**TECO:** Yes. All costs recovered through the Environmental Cost Recovery Clause have been appropriately removed from rate base for the 2014 projected test year.

**Issue 9:** Is TECO's requested level of Construction Work in Progress in the amount of \$174,146,000 for the 2014 projected test year appropriate?

**TECO:** Yes. TECO has properly forecasted this amount for Construction Work in Progress and it is appropriate.

**Issue 10:** Is TECO's requested level of Property Held for Future Use in the amount of \$35,409,000 for the 2014 projected test year appropriate?

**TECO:** Yes. TECO has properly forecasted this amount for Property Held for Future Use and it is appropriate.

**Issue 11:** Should Tampa Electric's proposal to increase its storm damage reserve target level to \$100 million be approved?

**TECO:** Yes. The proposed increase in the storm damage reserve target level is reasonable and should be approved.

**Issue 12:** Has TECO properly reflected the net overrecoveries or net underrecoveries of fuel and conservation expenses in its calculation of working capital?

**TECO:** Yes. TECO has properly reflected net over- and under-recoveries of fuel and conservation expenses in its calculation of working capital.

**Issue 13:** Is TECO's requested level of Working Capital in the amount of \$61,120,000 for the 2014 projected test year appropriate?

**TECO:** Yes. TECO has properly forecasted this amount for Working Capital and it is appropriate for the 2014 projected test year.

**Issue 14:** Is TECO's requested rate base in the amount of \$4,339,974,000 for the 2014 projected test year appropriate?

**TECO:** Yes. TECO has properly forecasted this amount for rate base and it is appropriate for the 2014 projected test year.

### **COST OF CAPITAL**

**Issue 15:** What is the appropriate amount of accumulated deferred taxes to include in the capital structure for the 2014 projected test year?

**TECO:** The appropriate amount of accumulated deferred taxes to be included in the capital structure for 2014 is \$835,173,000 as shown on MFR Schedule D-1a.

**Issue 16:** What is the appropriate amount and cost rate of the unamortized investment tax credits to include in the capital structure for the 2014 projected test year?

**TECO:** The appropriate amount and cost rate of the unamortized investment tax credits to include in the capital structure for 2014 is \$7,999,000 and 8.54%, respectively, as shown on MFR Schedule D-1a.

**Issue 17:** What is the appropriate amount and cost rate for short-term debt for the 2014 projected test year?

**TECO:** The appropriate amount and cost rate for short-term debt for 2014 are \$24,646,000 and 1.47%, respectively, as shown on MFR Schedule D-1a.

**Issue 18:** What is the appropriate amount and cost rate for long-term debt for the 2014 projected test year?

**TECO:** The appropriate amount and cost rate for long-term debt for the 2014 projected test year are \$1,525,392,000 and 5.40%, respectively, as shown on MFR Schedule D-1a.

**Issue 19:** What is the appropriate capital structure for the 2014 projected test year?

**TECO:** The appropriate capital structure for 2014 is the company's proposed capital structure as shown on MFR Schedule D-1a.

**Issue 20:** What is the appropriate return on common equity for the 2014 projected test year?

**TECO:** The appropriate return on common equity for 2014 projected test year is 11.25% with a range of 10.25% to 12.25%.

**Issue 21:** What is the appropriate weighted average cost of capital for the 2014 projected test year?

**TECO:** The appropriate weighted average cost of capital for the 2014 projected test year is 6.74%.

### **NET OPERATING INCOME**

**Issue 22:** Is TECO's projected level of Total Operating Revenues in the amount of \$950,663,000 for the 2014 projected test year appropriate?

**TECO:** Yes. TECO has properly forecasted this amount for Total Operating Revenues and it is appropriate for the 2014 projected test year.

**Issue 23:** What are the appropriate inflation factors for use in forecasting the test year budget?

**TECO:** The appropriate inflation factors for use in forecasting the 2014 test year budget are CPI of 240.7 and a CPI percentage increase of 2.7%.

**Issue 24:** Is TECO's requested level of O&M Expense including non-recoverable fuel in the amount of \$363,832,000 for the 2014 projected test year appropriate?

**TECO:** Yes. TECO has properly forecasted this amount for O&M Expense and it is appropriate for the 2014 projected test year.

**Issue 25:** Has TECO made the appropriate test year adjustments to remove fuel and purchased power revenues and expenses recoverable through the Fuel and Purchased Power Cost Recovery Clause?

**TECO:** Yes. TECO has made the appropriate test year adjustments to remove fuel and purchased power revenues and expenses recoverable through the Fuel and Purchased Power Cost Recovery Clause.

**Issue 26:** Has TECO made the appropriate test year adjustments to remove conservation revenues and expenses recoverable through the Conservation Cost Recovery Clause?

**TECO:** Yes. TECO has made the appropriate test year adjustments to remove conservation revenues and expenses recoverable through the Conservation Cost Recovery Clause.

**Issue 27:** Has TECO made the appropriate test year adjustments to remove capacity revenues and expenses recoverable through the Capacity Cost Recovery Clause?

**TECO:** Yes. TECO made the appropriate test year adjustments to remove capacity revenues and expenses recoverable through the Capacity Cost Recovery Clause.

**Issue 28:** Has TECO made the appropriate test year adjustments to remove environmental revenues and expenses recoverable through the Environmental Cost Recovery Clause?

**TECO:** Yes. TECO has made the appropriate test year adjustments to remove environmental revenues and expenses recoverable through the Environmental Cost Recovery Clause.

**Issue 29:** Has TECO made the appropriate adjustments to remove lobbying expenses from the 2014 projected test year?

**TECO:** Yes. TECO has made the appropriate adjustments to remove lobbying expenses from the 2014 projected test year.

**Issue 30:** What is the appropriate amount and amortization period for TECO's rate case expense for the 2014 projected test year?

**TECO:** The appropriate amount for rate case expense is \$2,200,000 and it should be amortized over a three-year period beginning in 2014.

**Issue 31:** What is the appropriate amount of Depreciation Expense for the 2014 projected test year?

**TECO:** The appropriate amount of Depreciation Expense for the 2014 projected test year is \$233,881,000 as shown on MFR Schedule C-1.

**Issue 32:** Is TECO's projected Net Operating Income in the amount of \$209,901,000 for the 2014 projected test year appropriate?

**TECO:** Yes. TECO's projected Net Operating Income of \$209,901,000 for the 2014 projected test year is appropriate.

### **REVENUE REQUIREMENTS**

**Issue 33:** What is the appropriate 2014 projected test year net operating income multiplier for TECO?

**TECO:** The appropriate net operating income multiplier for the 2014 test year is 1.63220 as shown on MFR Schedule C-44.

**Issue 34:** Is TECO's requested annual operating revenue increase for \$134,841,000 for the 2014 projected test year appropriate?

**TECO:** Yes. TECO's requested annual operating revenue increase of \$134,841,000 for the 2014 projected test year is appropriate.

### **RATE ISSUES**

**Issue 35:** Did TECO correctly calculate the projected revenues at existing rates?

**TECO:** Yes.

**Issue 36:** Is TECO's proposed Jurisdictional Separation Study appropriate?

**TECO:** Yes. TECO utilized, with minor changes, the same jurisdictional separation methodology approved by the Commission in its last base rate proceeding producing separation factors utilized in the MFRs. A proforma adjustment was made to the load related to two transmission contracts with a revision to that adjustment being made during the case reflecting updated information regarding the Calpine contract. The results of TECO's jurisdictional separation study show that retail represents the vast majority of the electric service provided by TECO

and that retail is responsible for 100.0% of production plant, 98.49% of transmission plant and 100% of distribution plant.

**Issue 37:** Is TECO's calculation of unbilled revenues correct?

**TECO:** Yes. TECO has accurately calculated unbilled revenues.

**Issue 38:** What is the appropriate retail Cost of Service methodology to be used to allocate base rate and cost recovery costs to rate classes?

**TECO:** The appropriate retail Cost of Service methodology is the 12 Coincident Peak and 50 Percent Average Demand ("12 CP and 50% AD"). It provides an appropriate classification and allocation of production plant to rate classes reflecting how power plants are planned and operated. The use of 50% AD rather than the 1/13<sup>th</sup> (or about 8%) or 25% AD better reflects cost causation. Investment in more expensive generating units to provide more efficient fuel conversion for the generation of electricity drives the need to use a greater energy allocation percentage. The 50% provides a balance between the inadequate 1/13<sup>th</sup> (8%) method and the too high Equivalent Peaker method (over 70%).

**Issue 39:** What is the appropriate allocation of any change in revenue requirements?

**TECO:** The appropriate allocation of any change, after recognizing any additional revenues realized in other operating revenues, should track, to the extent practical, each class' revenue deficiency as determined from TECO's proposed 12 CP and 50% AD cost of service study. The appropriate allocation compares present revenue for each class to the class cost of service requirement and then distributes the change in revenue requirements to classes. The appropriate allocation must recognize approved changes in treatment of current IS customers and implementation of Minimum Distribution System ("MDS"). Moving the classes close to 100% of parity and recognizing unit price change constraints provides a measure of fair recovery of cost.

**Issue 40:** Should Tampa Electric's proposed Minimum Distribution System ("MDS") costing method be approved?

**TECO:** Yes. The MDS method is described in the NARUC cost allocation manual and was accepted by the Commission in the settlement of rate and cost of service matters in Gulf Power Company's 2011 base rate proceeding. This method appropriately and equitably classifies certain distribution costs to the customer classification within the retail cost of service study and supports their recovery through the customer component of the bill.

**Issue 41:** Should the closed interruptible rate schedules (IS) be eliminated?



**TECO:** Yes. The interruptible rate schedules should be eliminated and existing customers on those rate schedules should be transferred to the appropriate GSD rate schedule and continue to participate in the company's GSLM-2 or GSLM-3 riders.

The interruptible rate schedules were closed to new business for many years having been found by the Commission to be not cost effective. The Commission has previously approved TECO's GSLM-2 AND GSLM-3 riders that provide a cost effective interruptible service option. This rate case is the appropriate time for the Commission to complete this long, gradual conversion of the remaining interruptible rate schedule customers to cost effective rates which provide the appropriate discount for their service and remove any remaining subsidy being provided to them by firm service customers.

**ISSUE 42:** Should an inverted base energy rate structure be retained for the RS rate schedule?

**TECO:** Yes. An inverted base energy rate for the RS rate schedule is reasonable and should be retained. The Commission approved inverted energy rates for the RS rate schedule in the Company's last rate proceeding and the continuation of inverted base energy rates will continue to provide a conservation-oriented incentive price signal.

**Issue 43:** Should the changes Tampa Electric is proposing in its service charges be approved?

**TECO:** Yes. The proposed service charge increases shown on MFR Schedule E-13b should be approved as they better reflect the cost of providing these services. The change of name of the Field Credit Visit charge to the Field Visit charge should be approved along with the increased application of the charge to customers who do not meet the scheduled appointment or who has not prepared made the premise ready for work to be performed as an incentive for customers to be ready for the scheduled visit by the Company.

**Issue 44:** What are the appropriate service charges (initial connection, normal reconnect subsequent subscriber, field visit, return check)?

**TECO:** The appropriate service charges are listed below.

Initial Service Connection	\$ 75.00
Normal Reconnect Subsequent Subscriber	\$ 28.00
Same Day Reconnect	\$ 75.00
Saturday Reconnect	\$ 300.00
Reconnect after Disconnect at Meter for Cause	\$ 55.00
Reconnect after Disconnect at Pole for Cause	\$ 165.00
Field Visit	\$ 25.00
Tampering Charge without Investigation	\$ 55.00
Return Check Fee	Per Fl. Statutes
Late Payment Charge	The Greater of 1.5% or \$5.00

**Issue 45:** What is the appropriate temporary service charge?

**TECO:** The appropriate temporary service charge is \$260.00.

**Issue 46:** Should the “Customer Charge” be renamed the “Basic Service Charge”?

**TECO:** The “Customer Charge” on all rate schedules should be renamed “Basic Service Charge” to reflect a more appropriate description of the costs being recovered in this fixed monthly charge.

**Issue 47:** What are the appropriate Basic Service charges?

**TECO:** The proposed charges are cost-based and they appropriately recognize the voltage related cost of service differences to customers. The appropriate Basic Service charges are listed below.

RS Standard	15.00 \$/bill
RSVP	15.00 \$/bill
GS Standard	18.00 \$/bill
GS Standard – Unmetered	15.00 \$/bill
GS Time-of-Day	20.00 \$/bill
TS Standard	18.00 \$/bill
Metered Lighting	15.00 \$/bill
GSD Standard Secondary	30.00 \$/bill
GSD Standard Primary	130.00 \$/bill
GSD Subtransmission	990.00 \$/bill
GSD Optional Secondary	30.00 \$/bill
GSD Optional Primary	130.00 \$/bill
GSD Optional Subtransmission	990.00 \$/bill
GSD Time-of-Day Secondary	30.00 \$/bill

GSD Time-of-Day Primary	130.00 \$/bill
GSD Time-of-Day Subtransmission	990.00 \$/bill
SBF Standard Secondary	55.00 \$/bill
SBF Standard Primary	155.00 \$/bill
SBF Standard Subtransmission	1,015.00 \$/bill
SBF Time-of-Day Secondary	55.00 \$/bill
SBF Time-of-Day Primary	155.00 \$/bill
SBF Time-of-Day Subtransmission	1,015.00 \$/bill

**Issue 48:** What are the appropriate demand charges?

**TECO:** Demand charges are set in combination with energy charges at levels required after all charges are considered that produce the target revenue requirements for each class. The appropriate demand charges are listed below.

GSD/GSD Optional/GSDT (all delivery voltages)	
GSD Standard	9.50 \$/kW
GSD Optional	N/A
GSDT Billing	3.23 \$/kW
GSDT Peak	6.27 \$/kW

SBF/SBFT Supplemental (all delivery voltages)	
SBF Standard	9.50 \$/kW
SBFT Billing	3.23 \$/kW
SBFT Peak	6.27 \$/kW

**Issue 49:** What are the appropriate energy charges?

**TECO:** The appropriate energy charges are listed below.

RS Standard First 1,000 kWh	5.078 ¢/kWh
RS Standard All Additional kWh	6.078 ¢/kWh
RSVP All Periods	5.390 ¢/kWh

GS Standard	5.390 ¢/kWh
GST On-Peak	14.384 ¢/kWh
GST Off-Peak	0.960 ¢/kWh

TS Standard	5.390 ¢/kWh
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Lighting	3.243 ¢/kWh
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GSD Standard	1.829 ¢/kWh
GSD Optional	6.468 ¢/kWh
GSDT On-Peak	3.999 ¢/kWh

GSDT Off-Peak	0.960 ¢/kWh
SBF Supplemental Energy Standard	1.829 ¢/kWh
SBFT Supplemental Energy, On-Peak	3.999 ¢/kWh
SBFT Supplemental Energy, Off-Peak	0.960 ¢/kWh

**Issue 50:** What are the appropriate Standby Service charges?

**TECO:** Standby Service charges are designed in accordance with the Commission's prescribed methodology. The appropriate Standby Service charges are listed below.

SBF/SBFT Standby Demand Charge (all delivery voltages)	
SBF Local Facilities Reservation plus greater of	2.08 \$/kW
SBF Power Supply Reservation	1.64 \$/kW-Mo.
SBF Power Supply Demand	0.65 \$/kW-Day
SBF Standby Energy	0.960 ¢/kWh
SBFT Local Facilities Reservation plus greater of	2.08 \$/kW
SBFT Power Supply Reservation	1.64 \$/kW-Mo
SBFT Power Supply Demand	0.65 \$/kW-Day
SBFT Standby Energy	0.960 ¢/kWh

**Issue 51:** Should the "Transformer Ownership Discount" be renamed the "Delivery Voltage Credit" and should the credits provided reflect full avoided distribution costs?

**TECO:** The "Transformer Ownership Discount" should be renamed "Delivery Voltage Credit" to better recognize taking service at the higher voltage, and the credits provided should reflect the full avoided distribution costs.

**Issue 52:** What are the appropriate delivery voltage credits to be applied for billing?

**TECO:** The appropriate delivery voltage credits are listed below.

GSD Standard Primary	0.80 \$/kW
GSD Standard Subtransmission	2.50 \$/kW
GSD Optional Primary	2.13 \$/MWh
GSD Optional Subtransmission	6.53 \$/MWh
GSDT Primary	0.80 \$/kW
GSDT Subtransmission	2.50 \$/kW
SBF Supplemental Primary	0.80 \$/kW
SBF Supplemental Subtransmission	2.50 \$/kW
SBF Standby Primary	0.67 \$/kW
SBF Standby Subtransmission	2.08 \$/kW
SBFT Supplemental Primary	0.80 \$/kW
SBFT Supplemental Subtransmission	2.50 \$/kW

SBFT Standby Primary	0.67 \$/kW
SBFT Standby Subtransmission	2.08 \$/kW

**Issue 53:** Should TECO’s proposed lighting schedule, and associated charges, terms, and conditions be approved?

**TECO:** Yes. TECO’s proposed lighting schedule should be approved. TECO proposes to increase the lighting energy rate and to maintain the existing lighting facilities rates.

**Issue 54:** Should the “Meter Level Discount” be renamed to “Metering Voltage Adjustment”?

**TECO:** Yes. The proposed name better reflects the billing adjustment made.

**Issue 55:** What are the appropriate Metering Voltage Adjustments to be applied for billing, and to what billing charges should the adjustments discount be applied?

**TECO:** The appropriate metering voltage adjustments are 1% for primary and 2% for subtransmission. These adjustments should apply to all base charges and credits with the exception of the Basic Service Charge.

**Issue 56:** What are the appropriate emergency relay service charges?

**TECO:** The appropriate emergency relay service charges are listed below.

GS Emergency Relay Charge	0.170 ¢/kWh
GSD Standard (all delivery voltages)	0.66 \$/kW
GSD Optional (all delivery voltages)	0.66 \$/kW
GSD Time-of-Day Billing (all delivery voltages)	0.66 \$/kW
SBF Supplemental (all delivery voltages)	0.66 \$/kW
SBF Standby (all delivery voltages)	0.66 \$/kW
SBFT Supplemental (all delivery voltages)	0.66 \$/kW
SBFT Standby (all delivery voltages)	0.66 \$/kW

**Issue 57:** What are the appropriate contributions-in-aid for time-of-use rate customers opting to make a lump sum payment for a time-of-use meter in lieu of a higher time-of-use customer charge?

**TECO:** The appropriate contributions-in-aid for time-of-use rate customers opting to make a lump sum payment for a time-of-use meter in lieu of a higher time-of-use customer charge are \$94.00 for the GST rate schedule and \$0 for the GSDT rate schedule.

**Issue 58:** What changes in allocation and rate design should be made to TECO's rates established in Docket Nos. 130001-EI, 130002-EG, and 130007-EI to recognize the decisions in various cost of service rate design issues in this docket?

**TECO:** The changes proposed by TECO regarding cost of service allocation and rate design should be made to TECO's rates established in the identified dockets to recognize decisions in this docket. Recovery factors for the cost recovery clauses must be revised when the base rate changes in this proceeding go into effect, as was proposed in the identified dockets.

**Issue 59:** What are the appropriate monthly rental factors and termination factors to be approved for the Facilities Rental Agreement, Appendix A?

**TECO:** The tariff includes a Facilities Rental Agreement with monthly rental factors and annual termination factors applicable to facilities TECO may agree to lease to customers. The appropriate monthly rental factors and termination factors to be approved are listed below.

Monthly Rental Factor	1.19 %
Termination Factors:	
Year 1	3.9%
Year 2	7.5%
Year 3	10.8%
Year 4	13.8%
Year 5	16.4%
Year 6	18.7%
Year 7	20.6%
Year 8	22.1%
Year 9	23.3%
Year 10	24.0%
Year 11	24.3%
Year 12	24.1%
Year 13	23.4%
Year 14	22.1%
Year 15	20.2%
Year 16	17.7%
Year 17	14.5%
Year 18	10.5%
Year 19	5.7%
Year 20	0.0%

**Issue 60:** What is the appropriate effective date for the rates and charges established in this proceeding?

**TECO:** The appropriate effective date for the rates and charges established in the proceeding is the date of the meter readings for the first billing cycle of January, 2014.

**Issue 61:** Should Tampa Electric's proposal to reinstate a Commercial/Industrial Service Rider ("CISR") tariff be approved?

**TECO:** Yes. The CISR tariffs serve as an economic development mechanism used to attract new load or retain existing commercial or industrial load. Reinstating the CISR will provide a tool to attract or retain commercial or industrial load for the benefit of all of the company's customers.

**OTHER ISSUES**

**Issue 62:** Should TECO be required to file, within 90 days after the date of the final order in this docket, a description of all entries or adjustments to its annual report, rate of return reports, and books and records which will be required as a result of the Commission's findings in this rate case?

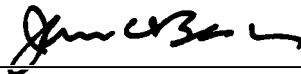
**TECO:** Yes.

**Issue 63:** Should this docket be closed?

**TECO:** Yes.

DATED this 15<sup>th</sup> day of July 2013.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Preliminary List of Issues and Positions, filed on behalf of Tampa Electric Company, has been served by email, overnight mail or hand delivery (\*) on this 15<sup>th</sup> day of July, 2013 to the following:

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ATTORNEY