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March 29, 2019

## VIA: ELECTRONIC FILING

Mr. Adam J. Teitzman **Commission Clerk** Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

> 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, by Tampa Electric Company FPSC Docket No. 20170271-EI

Dear Mr. Teitzman:

Attached for filing in the above docket is Tampa Electric Company's Unopposed Motion to Suspend Testimony Filing Schedule.

Thank you for your assistance in connection with this matter.

Sincerely,

James D. Beasley

JDB/pp Attachment

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Tampa Electric Company ) for Recovery of Costs Associated with ) Named Tropical Systems and ) Replenishment of Storm Reserve ) DOCKET NO. 20170271-EI

FILED: March 29, 2019

### TAMPA ELECTRIC COMPANY'S UNOPPOSED MOTION TO SUSPEND TESTIMONY FILING SCHEDULE

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Rule 28-106.204, Florida Administrative Code, hereby moves the Commission to suspend the schedule for the filing of further testimony (and other procedural deadlines as appropriate) in this proceeding and, as grounds therefor, says:

1. Tampa Electric, Office of Public Counsel ("OPC" or "Citizens"), the Florida Industrial Power Users Group ("FIPUG"), the Florida Retail Federation ("FRF"), collectively referred to herein as "the Parties", have been working together in an effort to finalize negotiations of a Storm Cost Settlement Agreement to resolve all issues in this proceeding and establish for Commission approval an amount of storm costs to be netted against Tampa Electric's 2018 annual federal income tax savings as contemplated in the Implementation Stipulation approved in this docket by Order No. PSC-2018-0125-PCO-EI, issued March 7, 2018.

2. The Parties' negotiations have produced an agreement in principle between the Office of Public Counsel and Tampa Electric that, if approved, will resolve all issues in this proceeding and eliminate the need for a lengthy evidentiary hearing with cross-examination. As the only Parties to the Docket expecting to file testimony, OPC and Tampa Electric need time to

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memorialize the agreement in principle into a Settlement Agreement that will be filed with the Commission as soon as possible, but no later than April 8, 2019.

3. Tampa Electric's testimony in this proceeding was filed February 8, 2019 with Intervenor (here just the OPC) and Staff testimony due April 8, 2019, and Tampa Electric's rebuttal testimony due April 22, 2019. Pre-hearing statements are due April 29, 2019.

4. The requested suspension of the above schedule will enable OPC and Tampa Electric to devote their full attention to finalizing their settlement efforts in a focused and more cooperative climate, without the diversion of attempting to simultaneously prepare opposing testimonies. Tampa Electric believes the requested suspension is in the best interests of all concerned and will be in keeping with the Commission's past observations that negotiated settlements of disputes are to be encouraged.

5. Tampa Electric suggests that the Prehearing Conference date on the current schedule (May 13, 2019) and the hearing dates (May 21-May 24) be retained to enable the Parties to present the proposed settlement agreement for Commission consideration once it is finalized.

6. Tampa Electric is authorized to represent that OPC supports this Motion and that FIPUG and FRF do not oppose it.

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WHEREFORE, Tampa Electric respectfully moves the Commission to suspend the schedule for the filing of further testimony (and other procedural deadlines as appropriate) in this proceeding for the reasons set forth above.

DATED this 29th day of March 2019.

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 Motion to Suspend Testimony Filing Schedule, filed on behalf of Tampa Electric Company, has been served by electronic mail on this 29th day of March, 2019 to the following:

Ms. Suzanne Brownless Ms. Johana Nieves Mr. Kurt Schrader Office of the General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 <u>sbrownle@psc.state.fl.us</u> <u>jnieves@psc.state.fl.us</u> <u>kschrade@psc.state.fl.us</u>

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Florida Retail Federation Mr. Robert Scheffel Wright Mr. John T. LaVia, III Gardner, Bist, Bowden, Bush, Dee, LaVia & Wright, P.A. 1300 Thomaswood Drive Tallahassee, FL 32308 <u>Schef@gbwlegal.com</u> <u>Jlavia@gbwlegal.com</u>

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