



May 2, 2024

ELECTRONIC FILING

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

In re: Petition for Rate Increase by Tampa Electric Company	DOCKET NO. 20240026-EI
In re: Petition for approval of 2023 Depreciation and Dismantlement Study, by Tampa Electric Company	DOCKET NO. 20230139-EI
In re: Petition to implement 2024 Generation Base Rate Adjustment provisions in Paragraph 4 of the 2021 Stipulation and Settlement Agreement, by Tampa Electric Company	DOCKET NO. 20230090-EI

Dear Mr. Teitzman:

Attached for filing in the above-referenced docket is Tampa Electric Company's Notice of Substitution of Witness and Adoption of Testimony. Please contact me if you have any questions about this notice.

Sincerely,

A handwritten signature in blue ink that reads 'Jeffrey Wahlen'.

J. Jeffrey Wahlen

cc: Adria Harper, OGC
Carlos Marquez, OGC
Timothy Sparks, OGC
Daniel Dose, OGC
Walt Trierweiler, Public Counsel
Patricia Christensen, OPC
Octavio Ponce, OPC
Charles Rehwinkel, OPC
Jon Moyle, FIPUG
Karen Putnal, FIPUG
Schef Wright, FRF
John LaVia, III, FRF
Thomas Jernigan, FEA
Leslie Newton, FEA
Ashley George, FEA
Ebony Payton, FEA
Bradley Marshall, Earthjustice
Jordan Luebkekmann, Earthjustice
Hema Lochan, Earthjustice
Nihal Shrinath, Sierra Club
Sari Amiel, Sierra Club

JJW/ne
Attachments

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase by Tampa Electric Company	DOCKET NO. 20240026-EI
In re: Petition for approval of 2023 Depreciation and Dismantlement Study, by Tampa Electric Company	DOCKET NO. 20230139-EI
In re: Petition to implement 2024 Generation Base Rate Adjustment provisions in Paragraph 4 of the 2021 Stipulation and Settlement Agreement, by Tampa Electric Company	DOCKET NO. 20230090-EI FILED: May 2, 2024

**TAMPA ELECTRIC COMPANY’S NOTICE OF
SUBSTITUTION OF WITNESS AND ADOPTION OF TESTIMONY**

Tampa Electric Company (“Tampa Electric” or the “company”) hereby notifies the Florida Public Service Commission and Parties of Record that Tampa Electric witness Jeff Chronister will be adopting the prepared direct testimony filed by Mr. Richard Latta on April 2, 2024 and that Mr. Latta will not be a witness in this docket. Tampa Electric offers the following to promote administrative efficiency for this change:

1. Contemporaneous with the filing of this notice, Tampa Electric will be filing a new version of Latta’s prepared direct testimony entitled “Prepared Direct Testimony of Jeff Chronister Volume II.” This Volume II will contain no substantive changes to the testimony originally filed by Mr. Latta. It will only reflect: (a) necessary changes to the name, title, qualification, and experience portions of Mr. Latta’s testimony to reflect that information for Mr. Chronister, (b) the renumbering of Mr. Latta’s exhibit from RL-1 to JC-2, and (c) changes to references to Mr. Chronister’s original April 2, 2024 testimony.

2. Going forward, Tampa Electric proposes that the prepared direct testimony filed by Mr. Chronister on April 2, 2024 be referred to as “Chronister’s Original Prepared Direct Testimony”

(or words to that effect) and the version of Mr. Latta’s testimony adopted by Mr. Chronister be referred to as “Chronister Volume II.”

3. The prepared direct testimony of some of Tampa Electric’s other witnesses filed on April 2, 2024 contain references to the prepared direct testimony of Richard Latta (or words to that effect). Rather than updating and refileing each of those other testimonies, Tampa Electric proposes that it be understood by virtue of this notice that all references to the testimony of Richard Latta in testimony of other Tampa Electric witnesses filed on April 2, 2024 will be references to Chronister Volume II. The document attached hereto as Exhibit A identifies by page and line number the places where the prepared direct testimony of other Tampa Electric witnesses refer to Mr. Latta’s testimony filed on April 2, 2024.

4. The exhibit that accompanied the prepared direct testimony of Tampa Electric witness Archie Collins (AC-1) includes as Document No. 1 a list of Tampa Electric witnesses and the purposes of their testimony. Tampa Electric will file an updated Document No. 1 of Exhibit AC-1 to reflect the witness change specified in this notice.

5. Mr. Latta is identified as co-sponsor with Mr. Chronister of a number of minimum filing requirement (“MFR”) schedules submitted by the company on April 2, 2024. He was not the sole sponsor of any MFR schedule. Since Mr. Chronister is already identified as a co-sponsor of all of Mr. Latta’s MFR schedules, and to avoid re-submitting MFR schedules, the company proposes that Mr. Latta be disregarded as a sponsor of any MFR schedule bearing his name. A list of those MFR schedules is attached hereto as Exhibit B.

6. The exhibit that accompanied the prepared direct testimony of Tampa Electric witness Archie Collins (AC-1) includes as Document No. 3 a list of witness assignments for MFR schedules. Tampa Electric will file an updated Document No. 3 of Exhibit AC-1 to reflect that Mr.

Latta will no longer be sponsoring any MFR schedules.

7. As part of the discovery process, the company has served answers to interrogatories propounded by the Office of Public Counsel that were supported by affidavits signed by Mr. Latta. Contemporaneous with the filing of this notice, the company has served affidavits signed by Mr. Chronister to be substituted for the affidavits of Mr. Latta.

8. Some of the answers to interrogatories served on the parties refer to the prepared direct testimony of Richard Latta and his exhibit (RL-1). Rather than updating those interrogatory answers, Tampa Electric proposes that it be understood by virtue of this notice that all references to the testimony of Richard Latta or his Exhibit (RL-1) in answers to interrogatories or other discovery responses will be references to Chronister Volume II and Exhibit No. JC-2.

9. Tampa Electric notes that Mr. Latta was noticed and cross-noticed for deposition in this docket to be held on May 8, 2024. Tampa Electric will make Mr. Chronister available for deposition in Mr. Latta's place on May 8, 2024 without the need for filing and service of amended deposition notices. Mr. Chronister will also be available on May 9, 2024 as originally noticed and cross-noticed.

10. In the interest of a complete record, Tampa Electric proposes to offer this Notice and its attachments into the record as an exhibit at the final hearing.

11. Tampa Electric appreciates the cooperation of the Staff and Parties on this change and will work in good faith on any other clarifications or changes needed to accomplish the substitution and adoption described above.

RESPECTFULLY SUBMITTED this 2nd day of May, 2024.



J. JEFFRY WAHLEN

jwahlen@ausley.com

MALCOLM N. MEANS

mmeans@ausley.com

VIRGINIA L. PONDER

vponder@ausley.com

Ausley McMullen

Post Office Box 391

Tallahassee, Florida 32302

(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC
COMPANY

EXHIBIT A

Other Witness References to Latta

Other Tampa Electric Witness	Location of Latta Reference
Direct Testimony of Archie Collins	Page 32, Line 5
	Page 35, Line 16
Direct Testimony of Karen Sparkman	Page 12, Line 17
Direct Testimony of Carlos Aldazabal	Page 4, Line 18
Direct Testimony of Jeff Chronister (original)	Page 6, Line 14
	Page 7, Line 7
	Page 14, Line 8
	Page 37, Line 11
	Page 43, Line 19
	Page 43, Line 22
	Page 45, Line 10
Direct Testimony of Kris Stryker	Page 5, Line 20
Direct Testimony of Marian Cacciatore	Page 6, Line 3

Other Tampa Electric Witness	Location of Latta Reference
Direct Testimony of Valerie Strickland	Page 7, Line 19
Direct Testimony of Valerie Strickland	Page 16, Line 8

EXHIBIT B

MFR Schedules Originally Co-Sponsored by Latta

Document	Location
Minimum Filing Requirements - F Schedules - Volume I of III (Miscellaneous) (Exhibit No. TEC-10)	PDF Page 2
	Bates Page 1
Minimum Filing Requirements - F Schedules - Volume II of III (Miscellaneous) (Exhibit No. TEC-11)	PDF Page 2
	Bates Page 146
Minimum Filing Requirements - F Schedules - Volume III of III (Miscellaneous) (Exhibit No. TEC-12)	PDF Page 2
	Bates Page 231
	Bates Page 267
	Bates Page 291
Minimum Filing Requirements - E Schedules (Cost of Service and Rate Design) (Exhibit No. TEC-5)	PDF Page 3
Minimum Filing Requirements - C Schedules - Net Operating Income (Exhibit No. TEC-3)	PDF Page 2 through PDF Page 7
	Bates Pages 1-59
	Bates Page 65 through Bates Page 68
	Bates Page 103 through Bates Page 119
	Bates Page 121 through Bates Page 122
Minimum Filing Requirements - A Schedules - Executive Summary (Exhibit No. TEC-1)	PDF Page 2
	Bates Page 1 through Bates Page 21
Minimum Filing Requirements - B Schedules - Rate Base (Exhibit No. TEC-2)	PDF Page 2 through PDF Page 5
	Bates Page 1 through Bates Page 154
	Bates Page 157 through Bates Page 178
	Bates Page 181 through Bates Page 182
Revised MFR Schedule C-6	Bates Page 26 through Bates Page 31
Corrected MFR Schedule B-7	Bates Page 30 through Bates Page 59

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of May, 2024, electronic copies of the foregoing Notice has been served by electronic mail on the following:

Adria Harper
Carlos Marquez
Timothy Sparks
Daniel Dose
Florida Public Service Commission/OGC
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
aharper@psc.state.fl.us
cmarquez@psc.state.fl.us
tsparks@psc.state.fl.us
ddose@psc.state.fl.us
discovery-gcl@psc.state.fl.us

Walt Trierweiler
Patricia Christensen
Octavio Ponce
Charles Rehwinkel
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399-1400
trierweiler.walt@leg.state.fl.us
christensen.patty@leg.state.fl.us
ponce.octavio@leg.state.fl.us
Rehwinkel.Charles@leg.state.fl.us

Bradley Marshall
Jordan Luebke
Earthjustice
111 S. Martin Luther King Jr. Blvd.
Tallahassee, FL 32301
bmarshall@earthjustice.org
jluebke@earthjustice.org

Nihal Shrinath
2101 Webster Street, Suite 1300
Oakland, CA 94612
nihal.shrinath@sierraclub.org

Jon Moyle
Karen Putnal
c/o Moyle Law Firm
118 N. Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
kputnal@moylelaw.com
mqualls@moylelaw.com

Leslie R. Newton, Maj. USAF
Ashley N. George, Capt. USAF
AFLOA/JAOE-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
Leslie.Newton.1@us.af.mil
Ashley.George.4@us.af.mil

Thomas A. Jernigan
AFCEC/JA-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
thomas.jernigan.3@us.af.mil

Ebony M. Payton
AFCEC-CN-ULFSC
139 Barnes Drive, Suite 1
Tyndall Air Force Base, Florida 32403
Ebony.Payton.ctr@us.af.mil

Mr. Robert Scheffel Wright
John LaVia, III
Gardner, Bist, Wiener, Wadsworth, Bowden,
Bush, Dee, LaVia & Wright, P.A.
1300 Thomaswood Drive
Tallahassee, FL 32308
shef@gbwlegal.com
jlavia@gbwlegal.com

Sari Amiel
Sierra Club
50 F. Street NW, Eighth Floor
Washington, DC 20001
sari.amiel@sierraclub.org

Hema Lochan
Earthjustice
48 Wall St., 15th Fl
New York, NY 10005
(212) 284-8021
hlochan@earthjustice.org
flcaseupdates@earthjustice.org



ATTORNEY