



BEN ALBRITTON
President of the Senate

STATE OF FLORIDA
OFFICE OF PUBLIC COUNSEL

c/o THE FLORIDA LEGISLATURE
111 WEST MADISON ST.
SUITE 812
TALLAHASSEE, FLORIDA 32399-1400
850-488-9330

EMAIL: OPC_WEBSITE@LEG.STATE.FL.US
WWW.FLORIDAOPC.GOV



DANIEL PEREZ
Speaker of the House of Representatives

March 12, 2025

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

Re: Docket No. 20250016-EI
Tampa Electric Company 2026-2035 Storm Protection Plan

Dear Mr. Teitzman:

Please find enclosed for filing in the above referenced docket the Direct Testimony and Exhibits of Kevin J. Mara. This filing is being made via the Florida Public Service Commission's web-based electronic filing portal.

If you have any questions or concerns, please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,

Walt Trierweiler
Public Counsel

/s/Charles J. Rehwinkel
Charles J. Rehwinkel
Deputy Public Counsel
rehwinkel.charles@leg.state.fl.us

CERTIFICATE OF SERVICE
DOCKET NOS. 20250014-EI, 20250015-EI,
20250016-EI, and 20250017-EI

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by electronic mail on this 12th day of March, 2025, to the following:

Jacob Imig
Timothy Sparks
Jennifer Augspurger
Saad Farooqi
Carlos Marquez
Florida Public Service Commission
Office of General Counsel
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
jimig@psc.state.fl.us
tsparks@psc.state.fl.us
jaugspur@psc.state.fl.us
sfarooqi@psc.state.fl.us
cmarquez@psc.state.fl.us
discovery-gcl@psc.state.fl.us

Kenneth A. Hoffman
Florida Power & Light Company
134 West Jefferson Street
Tallahassee, FL 32301-1713
ken.hoffman@fpl.com

Christopher T. Wright
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408-0420
christopher.wright@fpl.com

Dianne M. Triplett
Duke Energy Florida, LLC
299 First Avenue North
St. Petersburg, FL 33701
dianne.triplett@duke-energy.com

Matthew R. Bernier
Stephanie Cuello
Duke Energy Florida, LLC
106 East College Avenue, Suite 800
Tallahassee, FL 32301
matt.bernier@duke-energy.com
stephanie.cuello@duke-energy.com
FLRegulatoryLegal@duke-energy.com

J. Jeffrey Wahlen
Malcolm N. Means
Virginia Ponder
Ausley McMullen
P. O. Box 391
Tallahassee, FL 32302
jwahlen@ausley.com
mmeans@ausley.com
vponder@ausley.com

James W. Brew
Laura Wyn Baker
Sarah B. Newman
Stone Mattheis Xenopoulos & Brew
1025 Thomas Jefferson Street, NW
Suite 800 West
Washington, DC 20007-5201
jbrew@smxblaw.com
lwb@smxblaw.com
sbn@smxblaw.com

Robert Pickels
Duke Energy Florida, LLC
106 East College Avenue, Suite 800
Tallahassee, FL 32301-7740
robert.pickels@duke-energy.com

Paula K. Brown
Tampa Electric Company
P. O. Box 111
Tampa, FL 33601-0111
regdept@tecoenergy.com

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601
Tallahassee, FL 32301-1839
bkeating@gunster.com

Mark Cutshaw
Florida Public Utilities Company
780 Amelia Island Parkway
Fernandina Beach, FL 32034
mcutshaw@fpuc.com

Michelle D. Napier
Florida Public Utilities Company
208 Wildlight Avenue
Yulee, FL 32097
mnapier@fpuc.com

Mike Cassel
Florida Public Utilities Company
208 Wildlight Avenue
Yulee, FL 32097
mcassel@fpuc.com

/s/ Charles J. Rehwinkel
Charles J. Rehwinkel
Deputy Public Counsel
Rehwinkel.charles@leg.state.fl.us

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company.

DOCKET NO.: 20250014-EI

In re: Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC.

DOCKET NO.: 20250015-EI

In re: Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company.

DOCKET NO.: 20250016-EI

In re: Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Florida Public Utilities Company.

DOCKET NO.: 20250017-EI

FILED: March 12, 2025

DIRECT TESTIMONY

OF

KEVIN J. MARA, P.E.

ON BEHALF OF THE CITIZENS OF THE STATE OF FLORIDA

Walt Trierweiler
Public Counsel

Charles J. Rehwinkel
Deputy Public Counsel

Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Suite 812
Tallahassee, FL 32399-1400
(850) 488-9330

*Attorneys for the Citizens
of the State of Florida*

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	DISCUSSION	6

EXHIBITS

Curriculum Vitae	KJM-1
TECO Response to Staff's First Set of Interrogatories, No. 1	KJM-2
TECO Response to Staff's First Set of Interrogatories, No. 2	KJM-3

1 **DIRECT TESTIMONY**

2 **OF**

3 **KEVIN J. MARA**

4 On Behalf of the Office of Public Counsel

5 Before the

6 Florida Public Service Commission

7 DOCKET NO. 20250016-EI

8

9 **I. INTRODUCTION**

10 **Q. WHAT IS YOUR NAME, OCCUPATION, AND BUSINESS ADDRESS?**

11 A. My name is Kevin J. Mara. My business address is 1850 Parkway Place, Suite 800,
12 Marietta, Georgia 30067. I am the Executive Vice President of the firm GDS Associates,
13 Inc. ("GDS") and Principal Engineer for a GDS company doing business as Hi-Line
14 Engineering. I am a registered professional engineer (P.E.) in Florida and 22 additional
15 states.

16

17 **Q. PLEASE STATE YOUR PROFESSIONAL EXPERIENCE.**

18 A. I received a Bachelor of Science degree in Electrical Engineering from Georgia Institute
19 of Technology in 1982. Between 1983 and 1988, I worked at Savannah Electric and Power
20 as a distribution engineer designing new services to residential, commercial, and industrial
21 customers. From 1989-1998, I was employed by Southern Engineering Company as a
22 planning engineer providing planning, design, and consulting services for electric
23 cooperatives and publicly-owned electric utilities. In 1998, I, along with a partner, formed
24 a new firm, Hi-Line Associates, which specialized in the design and planning of electric
25 distribution systems. In 2000, Hi-Line Associates became a wholly owned subsidiary of

1 GDS Associates, Inc. and the name of the firm was changed to Hi-Line Engineering, LLC.
2 In 2001, we merged our operations with GDS Associates, Inc., and Hi-Line Engineering
3 became a department within GDS. I serve as the Principal Engineer for Hi-Line
4 Engineering and am Executive Vice President of GDS. I have field experience in the
5 operation, maintenance, and design of transmission and distribution systems. I have
6 performed numerous planning studies for electric cooperatives and municipal systems. I
7 have prepared short circuit models and overcurrent protection schemes for numerous
8 electric utilities. I have also provided general consulting, underground distribution design,
9 and territorial assistance.

10

11 **Q. PLEASE DESCRIBE GDS ASSOCIATES, INC.**

12 A. GDS is an engineering and consulting firm with offices in Marietta, Georgia; Austin,
13 Texas; Auburn, Alabama; Bedford, New Hampshire; Augusta, Maine; Orlando, Florida;
14 Folsom, California; Redmond, Washington; and Madison, Wisconsin. GDS has over 180
15 employees with backgrounds in engineering, accounting, management, economics,
16 finance, and statistics. GDS provides rate and regulatory consulting services in the electric,
17 natural gas, water, and telephone utility industries. GDS also provides a variety of other
18 services in the electric utility industry including power supply planning, generation support
19 services, financial analysis, load forecasting, and statistical services. Our clients are
20 primarily publicly owned utilities, municipalities, customers of privately-owned utilities,
21 groups or associations of customers, and government agencies.

22

23 **Q. HAVE YOU TESTIFIED BEFORE ANY REGULATORY COMMISSIONS?**

24 A. Yes, I have submitted testimony before the following regulatory bodies:

25 • Vermont Department of Public Service;

- 1 • Federal Energy Regulatory Commission ("FERC");
- 2 • District of Columbia Public Service Commission;
- 3 • Public Utility Commission of Texas;
- 4 • Maryland Public Service Commission;
- 5 • Corporation Commission of Oklahoma;
- 6 • Public Service Commission of South Carolina; and
- 7 • Florida Public Service Commission.

8 I have also submitted expert opinion reports before United States District Courts in
9 Alabama, California, South Carolina, and New Mexico.

10

11 **Q. HAVE YOU PREPARED AN EXHIBIT DESCRIBING YOUR QUALIFICATIONS**
12 **AND EXPERIENCE?**

13 A. Yes. I have attached Exhibit KJM-1, which is a summary of my regulatory experience and
14 qualifications.

15

16 **Q. ON WHOSE BEHALF ARE YOU APPEARING?**

17 A. GDS was retained by the Florida Office of Public Counsel ("OPC") to provide technical
18 assistance and expert testimony regarding the Tampa Electric Company's ("Company" or
19 "TECO") 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, Florida
20 Administrative Code ("F.A.C."). Accordingly, I am appearing on behalf of the Citizens of
21 the State of Florida.

22

23 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

24 A. I am presenting my expert opinion regarding the reasonableness of TECO's proposed

1 2026 - 2035 Storm Protection Plan (“SPP” or “Plan”) and its consistency with the
2 applicable standards for the Commission to consider the SPP.

3 The fact that I do not address any specific element of the company’s SPP or address
4 any other particular issues in my testimony or am silent with respect to any portion of the
5 company’s direct testimony in this proceeding should not be interpreted as an approval of
6 any position taken by that company in the testimony to which I have had an opportunity to
7 respond.

8

9 **Q. WHAT INFORMATION DID YOU REVIEW IN PREPARATION OF YOUR**
10 **TESTIMONY?**

11 A. I reviewed the Company’s filing, including the direct testimony and exhibits. I also
12 reviewed the Company’s responses to OPC’s discovery (including deposition testimony),
13 the Company’s responses to the Florida Public Service Commission (“PSC” or
14 “Commission”) Staff’s discovery, and other materials pertaining to the SPP and its impacts
15 on the Company. In addition, I reviewed section 366.96, Florida Statutes (“F.S.”), which
16 requires the filing of the SPP and authorized the Commission to adopt the relevant rules,
17 including Rule 25-6.030, F.A.C., which addresses the Commission's approval of a
18 Transmission and Distribution SPP that covers a utility's immediate 10-year planning
19 period.

20

21 **Q. WERE YOU OPERATING UNDER ANY LIMITATIONS IN PREPARING YOUR**
22 **TESTIMONY?**

23 A. Yes. As I was preparing my testimony, I realized that more information was needed
24 regarding the Legacy Storm Hardening Programs.

1 **Q. HOW DID THESE LIMITATIONS AFFECT YOUR ANALYSIS IN THIS CASE?**

2 A. It is not clear from the current record what costs are included in the Distribution Pole
3 Replacement program which is contained in the Legacy Storm Hardening Program and
4 subject to a settlement agreement from 2020.¹ The agreement calls for exclusion of
5 retirements and additions to the poles. However, given the schedule, I did not have
6 sufficient time for additional discovery to determine if these excluded costs are being
7 submitted for recovery eligibility in the proposed SPP.

8
9 **Q. PLEASE DESCRIBE HOW THE REMAINDER OF YOUR TESTIMONY IS**
10 **ORGANIZED.**

11 A. I have focused my testimony on the new programs proposed by TECO in the 2026 SPP.
12 These new programs include the Distribution Storm Surge Hardening program and the
13 Transmission Switch Hardening program. Finally, I address certain aspects of the Legacy
14 Storm Hardening program.

15
16 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.**

17 A. In summary:

- 18 1. I recommend the Distribution Storm Surge Hardening program be excluded from
19 the SPP for non-compliance with the filing requirements.
- 20 2. I recommend the Transmission Switch Hardening program be excluded from the
21 SPP for non-compliance with the filing requirements.

¹ Docket Nos. 20200145-EI, 20200064-EI, 20200065-EI, 20200067-EI, and 20200092-EI, Order No. PSC-2020-0224-AS-EI.

1 **II. DISCUSSION**

2 **Q. WITH REGARD TO THE FLORIDA SUPREME COURT’S 2024 DECISION IN**
3 **CITIZENS OF STATE V. FAY, 396 SO. 3D 549 (FLA. 2024), THAT A PRUDENCE**
4 **OR COST EFFECTIVENESS DETERMINATION WAS NOT REQUIRED AND**
5 **THUS NOT A PROPER SUBJECT OF INTERVENOR TESTIMONY, WAS**
6 **THERE ANY ANALYSIS THAT YOU BELIEVED WAS THUS BARRED THAT**
7 **WOULD HAVE OTHERWISE BEEN HELPFUL OR NECESSARY TO THE**
8 **COMMISSION TO DETERMINE WHETHER THE SPP OF TECO IS IN THE**
9 **PUBLIC INTEREST AND MEETS THE INTENT OF THE LEGISLATURE AS**
10 **EXPRESSED IN THE SPP STATUTE?**

11 **A.** Rule 25-6.030, F.A.C. (“SPP Rule”), sets forth comprehensive requirements for a Utility’s
12 Storm Protection Plan. Specifically, Rule 25-6.030(3)(d)(1), F.A.C., and Rule 25-
13 6.030(3)(d)(3), F.A.C., calls for benefit and cost estimates for each Program within the
14 Plan, and Rule 25-6.030(3)(d)(4), F.A.C., calls for cost to benefit comparison for each
15 Program. In light of the Florida Supreme Court’s interpretation of section 366.96, F.S.,
16 and the SPP Rule, I believe it is necessary for me to express my opinion that without the
17 requirement of an up-front prudence or cost-effectiveness determination, consumers are at
18 risk of exposure to runaway budgets and expenditures over the life of these plans. With no
19 evidence allowed or taken on prudence or cost effectiveness, substantial changes in SPP
20 Programs and Program budgets may be overlooked and may not be considered, resulting
21 in an increased burden on the rate payers. This scenario effectively cuts the Commission
22 off from determining whether enormous sums of money are being spent to achieve
23 diminishing returns both in the form of benefits to customers and in the interest of State of
24 Florida as a whole.

1 **Q. DO YOU HAVE AN UNDERSTANDING OF THE INFORMATION THE**
2 **COMMISSION USES TO EVALUATE A FILED SPP?**

3 A. Yes. In PSC rulings related to the prior SPP, the PSC noted that the information used to
4 evaluate a plan is contained in Subsection 366.96(4), F.S., which provides:

5 (4) In its review of each transmission and distribution storm protection plan
6 filed pursuant to this section, the commission shall consider:

7
8 (a) The extent to which the plan is expected to reduce
9 restoration costs and outage times associated with extreme
10 weather events and enhance reliability, including whether
11 the plan prioritizes areas of lower reliability performance.

12
13 (b) The extent to which storm protection of transmission and
14 distribution infrastructure is feasible, reasonable, or practical
15 in certain areas of the utility's service territory, including,
16 but not limited to, flood zones and rural areas.

17
18 (c) The estimated costs and benefits to the utility and its
19 customers of making the improvements proposed in the plan.

20
21 (d) The estimated annual rate impact resulting from
22 implementation of the plan during the first 3 years addressed
23 in the plan.²
24

25 **Q. WHAT ELEMENTS DOES RULE 25-6.030(3), F.A.C., REQUIRE FOR A**
26 **PROGRAM TO BE INCLUDED IN SPP?**

27 A. Rule 25-6.030(3), F.A.C., requires a utility to provide the following key components:
28 a description of the utility's service area, including areas prioritized for enhancement and
29 any areas where the utility determined that enhancement of the utility's existing
30 transmission and distribution facilities would not be feasible, reasonable, or practical.³

31 Pursuant to subsection (3) of the rule each SPP must contain certain elements, including :

32 (a) A description of how implementation of the proposed
33 Storm Protection Plan will strengthen electric utility

² Docket No. 20220048-EI, Order No. PSC-2022-0388-FOF-EI, p. 6., Docket No. 20220051-EI Order No. PSC-2022-0389-FOF-EI, p. 6, Docket No. 20220049-EI, Order No. PSC-2022-0387-FOF-EI, p. 5., and Docket No. 20220050-EI, Order No. PSC-2022-0388-FOF-EI, p. 6.

³ Docket No. 2022004-EI, Order No. PSC-2022-0386-FOF-EI, p. 11.

1 infrastructure to withstand extreme weather
2 conditions...

3 (b) A description of how implementation of the proposed
4 Storm Protection Plan will reduce restoration costs and
5 outage times associated with extreme weather
6 conditions...

7
8 (c) A description of the utility's service area, including areas
9 prioritized for enhancement and any areas where the
10 utility has determined that enhancement of the utility's
11 existing transmission and distribution facilities would
12 not be feasible, reasonable, or practical. Such
13 description must include:

- 14 • A general map of the area under consideration,
- 15 • The number of customers served within each area,
- 16 • Reasoning for areas prioritized for enhancement, and
- 17 • Reasoning for areas deemed not suitable for
- 18 enhancement.
- 19

20
21 (d) A description of each proposed storm protection program
22 that includes:

23
24 1. A description of how each proposed storm protection
25 program is designed to enhance the utility's existing
26 transmission and distribution facilities including an
27 estimate of the resulting reduction in outage times and
28 restoration costs due to extreme weather conditions;

29
30 2. If applicable, the actual or estimated start and
31 completion dates of the program;

32
33 3. A cost estimate including capital and operating
34 expenses;

35
36 4. A comparison of the costs identified in subparagraph
37 (3)(d)3 and the benefits identified in subparagraph
38 (3)(d)1.; and

39
40 5. A description of the criteria used to select and
41 prioritize proposed storm protection programs.

42

1 **Q. DOES TECO'S NEW DISTRIBUTION STORM SURGE HARDENING**
2 **PROGRAM MEET THE REQUIRES SET FORTH IN RULE 25-6.030 F.A.C.?**

3 A. No. For this new program, which was not included in the 2023 SPP, TECO failed to
4 comply with Rule 25-6.030(3)(c), F.S., by not providing a general map for the program in
5 the filed 2026 SPP, the number of customers served by the program, nor a designation of
6 any areas of the system not feasible, reasonable, or practical.

7 **Q. DOES TECO'S NEW DISTRIBUTION STORM SURGE HARDENING**
8 **PROGRAM INCLUDE ANY ALTERNATIVES TO MITIGATE RATE IMPACTS?**

9 A. No. According to Rule 25-6.030(3)(i), F.A.C., utilities are required to provide a description
10 of any implementation alternatives that could mitigate the resulting rate impact for each of
11 the first three years of the proposed Storm Protection Plan. In fact, the Staff made data
12 requests inquiring about options for delaying the program⁴ because this information is not
13 included in the filed SPP.

14

15 **Q. SHOULD THE COST OF THE DISTRIBUTION STORM SURGE HARDENING**
16 **PROGRAM BE EXCLUDED FROM TECO'S SPP?**

17 A. Yes. As I have detailed, this new program does not meet the filing requirements set forth
18 by the Rule 25-6.030, F.A.C.

19

20 **Q. DOES TECO'S NEW TRANSMISSION SWITCH HARDENING PROGRAM**
21 **MEET THE REQUIRES SET FORTH IN RULE 25-6.030?**

22 A. No. TECO failed to comply with Rule 25-6.030(3)(a), F.A.C., because there is no
23 description of how implementation of the proposed program will strengthen electric utility

⁴ See Exhibit KJM-3, TECO Response to Staff's First Set of Interrogatories, No. 2.

1 infrastructure to withstand extreme weather conditions. The description provided by
2 TECO only addresses normal operations of the transmission switches. Further, TECO
3 failed to comply with Rule 25-6.030(3)(b), F.A.C., because there is no description of how
4 the new Transmission Switch Hardening Program will reduce restoration costs and outage
5 times associated with extreme weather conditions.⁵ It is necessary for line personnel to
6 patrol a section of line prior to operating a switch remotely to restore service; therefore,
7 having remote control over the switch limits its effectiveness during major events. Also,
8 these remote-controlled switches are required by OSHA to have manual overrides to
9 protect workers who may be working in the vicinity. Specifically, the workers in the area
10 may have tagged a switch open and this is often done with manual overrides to prevent an
11 inadvertent closing of a switch putting workers in harm's way. Thus, during a major event,
12 the effectiveness of remote-control switches is diminished due to the potential for
13 confusion of many different crews working in an area including crews from out of town
14 assisting TECO in restoration efforts. TECO witness Palladino could not unequivocally
15 state in his deposition that circumstances would not exist where the automated functionality
16 would be always available under OSHA-regulated circumstances.

17 Also, TECO did not comply with Rule 25-6.030(3)(c), F.A.C., because TECO did
18 not provide in its SPP general maps, number of customers served by the program, and a
19 designation of any areas of the system not feasible, reasonable, or practical.

20 Further, this same rule requires utilities to provide a comparison of the costs and
21 benefits which were not provided by TECO.

⁵ TECO's response to Citizen's request for Production of Documents, 1-4b, contained the estimated cost of the program but did not include any reduction in customer interruptions, customer minutes of interruption or reduction in restoration time.

1 **Q. DID TECO PROVIDE SUFFICIENT ANALYSIS OF SAVINGS INFORMATION**
2 **TO ALLOW A DETERMINATION WHETHER THE COST OF THE**
3 **TRANSMISSION SWITCH HARDENING PROGRAM SHOULD BE INCLUDED**
4 **IN TECO’S SPP?**

5 A. TECO did not provide any quantitative analysis of savings. Rather the SPP contains this
6 vague and unsubstantiated statement:

7 While the company has not developed a quantitative estimate of
8 these benefits at this time, the company is confident that adding
9 remote-operating capabilities will result in these benefits.⁶

10
11
12
13
14
15
16
17
18
19

The Rule specifically requires an estimate of the restoration time or reduction in CMI and
TECO has not provided either value. The PSC has stated that a utility should have the
option to submit what it deems is its most accurate data or analysis of costs and benefits
for the Commission’s consideration.⁷ However, the lack of any quantitative cost estimate
and only vague notion of confidence that the program will provide benefits is, in my
opinion, insufficient for the Commission to weigh the value of this program on behalf of
the ratepayers. Furthermore, without some estimate of benefits, it is not possible to
compare costs and benefits as required by Rule 25-6.030, F.A.C.

20 **Q. DOES TECO’S NEW TRANSMISSION SWITCH HARDENING PROGRAM**
21 **INCLUDE ANY ALTERNATIVES TO MITIGATE RATE IMPACTS?**

22 A. No. According to Rule 25-6.030(3)(i), F.A.C., utilities are required to provide a description
23 of any implementation alternatives that could mitigate the resulting rate impact for each of
24 the first three years of the proposed Storm Protection Plan. In fact, the Staff made data

⁶ TECO Witness Kevin E. Palladino, Exhibit KEP-1, Page 51 of 58.

⁷ Docket No. 20220048-EI, Order No. PSC-2022-0388-FOF-EI, p. 7.

1 requests inquiring about options for delaying the program⁸ because this information is not
2 included in the filed SPP.

3

4 **Q. SHOULD THE COST OF THE TRANSMISSION SWITCH HARDENING**
5 **PROGRAM BE EXCLUDED FROM TECO’S SPP?**

6 A. Yes. As I have detailed, this new program does not meet the filing requirements set forth
7 by the Rule 25-6.030, F.A.C.

8

9 **Q. IN YOUR OPINION SHOULD THE PSC CONSIDER ANY ADDITIONAL**
10 **INFORMATION SUCH AS INFORMATION IN RESPONSE TO DATA**
11 **REQUESTS OR PRODUCTION OF DOCUMENTS OR EVEN NEW**
12 **INFORMATION FROM REBUTTAL TESTIMONY?**

13 A. In my opinion, no. The PSC should rely on information contained in the filed SPP. It is
14 likely the PSC will consider other information, but the utility should not be modifying the
15 programs by means of testimony or responses to data requests. In fact, in Order No. PSC-
16 2022-0388-FOF-EI, the Commission stated the following:

17 The rule implementing this statute identifies the types of
18 information a utility is to submit for us to consider as part of our SPP
19 review. See Rule 25-6.030(3), F.A.C. (“For each Storm Protection
20 Plan, the following information must be provided . . .”). By its plain
21 language, this rule specifies only the informational content of the
22 SPP filing.⁹

23

24 Of course, the PSC can approve a modified plan, but in my opinion, the burden is on the
25 utility to provide the required information in the SPP for the PSC to make a public interest
26 determination on its program within the SPP.

⁸ See Exhibit KJM-2, TECO Response to Staff’s First Set of Interrogatories, No. 1.

⁹ Docket No. 20220048-EI, Order No. PSC-2022-0388-FOF-EI, p. 6.

1 **Q. CAN TECO IMPLEMENT THIS PROGRAM IN BASE RATES?**

2 A. Yes. The fact is that there are existing switches already deployed in the Company's system.
3 This is another reason why the program is not suitable for inclusion in the SPP and recovery
4 through the SPPCRC.

5

6 **Q. DID TECO INCLUDE COSTS IN THE SPP FOR LEGACY PROGRAMS?**

7 A. Yes. TECO's SPP includes costs for Legacy Storm Hardening Initiatives.

8

9 **Q. WHAT PROGRAMS ARE INCLUDED IN THE LEGACY STORM HARDENING**
10 **INITIATIVES?**

11 A. TECO lists the programs within the Legacy Programs¹⁰ as follows:

- 12 1. TECO's Geographic Information System ("GIS") including development and
13 improvements,
- 14 2. Post-Storm Data Collection used for forensic analysis following major weather
15 events,
- 16 3. Outage Data for overhead and underground systems,
- 17 4. Increased Coordination with Local Governments for collaboration for planning
18 response, and recovery of major events,
- 19 5. Collaborative Research with other Florida investor-owned electric utilities and
20 other utilities to further development of storm resilient infrastructure and
21 technologies,
- 22 6. Disaster Preparedness and Recovery Plan which includes implementation of the
23 plan and exercising the plan as needed,
- 24 7. Distribution Pole Replacements, and

¹⁰ TECO Witness Kevin E. Palladino, Exhibit KEP-1, Page 3 of 58.

1 8. Legacy Storm Hardening Initiatives Costs included costs for Legacy Storm
2 Hardening Initiatives.
3

4 **Q. ARE THE LEGACY STORM HARDENING INITIATIVES FOR TECO**
5 **RECOVERED THROUGH THE SPPCRC?**

6 A. Not all of the costs are recovered through the SPPCRC. It is my understanding that TECO
7 will recover O&M expenses through the SPPCRC. However, for the Distribution Pole
8 Replacement program, the capital costs will be assigned to the SPP with the exception of
9 plant additions and retirements associated with all distribution pole replacement which will
10 remain through base rates.¹¹ The settlement agreement directed all SPP capital projects
11 initiated after April 10, 2020, for recovery through the SPPCRC, subject to a prudence
12 review.¹² Specifically, the agreement requires TECO to recover costs associated with
13 distribution pole replacements through base rates.
14

15 **Q. DID THE EXPEDITED SCHEDULE FOR THIS DOCKET RESULT IN**
16 **LIMITATIONS IN PREPARING YOUR TESTIMONY?**

17 A. Yes. It is not clear from the current record what costs are included in the Distribution Pole
18 Replacement program. The agreement calls for exclusion from the SPPCRC of retirements
19 and additions to the poles. However, I did not have sufficient time for additional discovery.

¹¹ Order No. PSC-2020-0224-AS-EI, p. 7.

¹² Order No. PSC-2020-0224-AS-EI, p. 6.

1 **Q. ARE THERE ANY OTHER ELEMENTS OF THE FILING AND OR**
2 **INFORMATION PROVIDED THAT YOU BELIEVE THAT COMMISSION**
3 **SHOULD TAKE INTO ACCOUNT FOR TECO'S SPP?**

4 A. Yes. In several instances, the SPP TECO witness Palladino's Exhibit KMP-1 contains
5 references to "prudent," while TECO witness DeStitger uses similar terminology. In accord
6 with the aforementioned Florida Supreme Court decision, I will not substantively respond
7 to these testimonies on that issue. However, if the Commission allows the Company to
8 nevertheless introduce the concept of "prudence" in this decision making, I believe it would
9 be necessary for me to provide supplemental testimony in that regard.

10

11 **Q. DOES THIS COMPLETE YOUR PREFILED TESTIMONY?**

12 A. Yes, it does.



KEVIN MARA

EXECUTIVE VICE PRESIDENT &
PRINCIPAL ENGINEER, P. E.



PROFILE

Mr. Mara has over 30 years of experience as a distribution engineer. He worked six years at Savannah Electric as a Distribution Engineer and ten years with Southern Engineering Company as a Project Manager. At Savannah Electric, Mr. Mara gained invaluable field experience in the operation, maintenance, and design of transmission and distribution systems. While at Southern Engineering, Mr. Mara performed planning studies, general consulting, underground distribution design, territorial assistance, and training services. Presently, Mr. Mara is a Vice President at GDS Associates, Inc. and serves as the Principal Engineer for GDS Associates' engineering services company known as its trade name Hi-Line Engineering.

Overhead Distribution System Design. Mr. Mara is in responsible charge of the design of distribution lines for many different utilities located in a variety of different terrains and loading conditions. Mr. Mara is in responsible charge of the design of over 500 miles of distribution line conversions, upgrades, and line re-insulation each year. Many of these projects include acquisition of right-of-way, obtaining easements, and obtaining permits from various local, state and federal agencies. In addition, Mr. Mara performs inspections at various stages of completion of line construction projects to verify compliance of construction and materials with design specifications and applicable codes and standards.

Underground Distribution System Design. Mr. Mara has developed underground specifications for utilities and was an active participant on the Insulated Conductor Committee for IEEE. He has designed underground service to subdivisions, malls, commercial, and industrial areas in various terrains. These designs include concrete-encased ductlines, direct-burial, bridge attachments, long-bores, submarine, and tunneling projects. He has developed overcurrent and overvoltage protection schemes for underground systems for a variety of clients with different operating parameters.

TRAINING SEMINARS

Mr. Mara has developed engineering training courses on the general subject of distribution power line design. These seminars have become extremely popular with more than 25 seminars being presented annually and with more than 4,000 people having attended seminars presented by Mr. Mara. A 3-week certification program is offered by Hi-Line Engineering in eleven states. The following is a list of the training material developed and/or presented:

- Application and Use of the National Electric Safety Code
- How to Design Service to Large Underground Subdivisions
- Cost-Effective Methods for Reducing Losses/Engineering Economics
- Underground System Design
- Joint-Use Contracts – Anatomy of Joint-Use Contract
- Overhead Structure Design
- Easement Acquisition
- Transformer Sizing and Voltage Drop

Construction Specifications for Electric Utilities. Mr. Mara has developed overhead construction specifications including overhead and underground systems for several different utilities. The design included overcurrent protection for padmounted and pole mounted transformers. The following is a representative list of past and present clients:

- | | |
|--|------------------------------------|
| - Cullman EMC, Alabama | - Three Notch EMC, Georgia |
| - Blue Ridge EMC, South Carolina | - Little River ECI, South Carolina |
| - Buckeye Rural Electric Cooperative, Ohio | - Lackland Air Force Base |
| | - Maxwell Air Force Base |

CONTACT

- 770-425-8100
- Kevin.mara@gdsassociates.com
- gdsassociates.com
- Marietta GA 30067

EDUCATION

Bachelor of Science, Electrical Engineering, Georgia Institute of Technology, 1982

PROFESSIONAL AFFILIATIONS / CERTIFICATIONS

Registered *Professional Engineer* in Alabama, Arkansas, Georgia, Florida, Idaho, Indiana, Kansas, Kentucky, Louisiana, Michigan, Mississippi, Missouri, North Carolina, Ohio, Oregon, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Virginia, Washington, and Wisconsin.

Institute of Electrical and Electronic Engineers Power Engineering Society: Senior Member

National Electric Safety Code Subcommittee 5: Alternate Member

Past Member: Insulated Conductor Committee

EXPERTISE

- Overhead & Underground Distribution Design
- Distribution System Planning
- Power System Modeling & Analysis
- Training



KEVIN MARA

Docket No. 20250016-EI
Curriculum Vitae
Exhibit KJM-1
Page 2 of 6

EXECUTIVE VICE PRESIDENT &
PRINCIPAL ENGINEER, P.E.

CONTACT

- 770-425-8100
- Kevin.mara@gdsassociates.com
- gdsassociates.com
- Marietta GA 30067

SYSTEM PRIVATIZATION/EVALUATION

Central Electric Power Cooperative, Columbia, SC

- 2017 Independent Certification of Transmission Asset Valuation, Silver Bluff to N. Augusts 115kV
- 2015 Independent Certification of Transmission Asset Valuation, Wadmalaw 115kV

Choctawhatchee Electric Cooperative, DeFuniak Springs, FL

- Inventory and valuation of electrical system assets at Eglin AFB prior to 40-year lease to private-sector entity.

PUBLICATIONS

- Co-author of the NRECA “Simplified Overhead Distribution Staking Manual” including editions 2, 3 and 4.
- Author of “Field Staking Information for Overhead Distribution Lines”
- Author of four chapters of “TVPPA Transmission and Distribution Standards and Specifications”

TESTIMONIES & DEPOSITIONS

Mr. Mara has testified as an expert at trial or by deposition in the following actions.

- *Deposition related to condemnation of property*, Newberry ECI v. Fretwell, 2005, State of South Carolina
- *Testimony in Arbitration regarding territory dispute*, Newberry ECI v. City of Newberry, 2003, State of South Carolina, Civil Action No. 2003-CP-36-0277
- *Expert Report and Deposition, 2005*, United States of America v. Southern California Edison Company, Case No CIV F-01-5167 OWW DLB
- *Expert Report and Deposition, 2005*, Contesting a transmission condemnation, Moore v. South Carolina Electric and Gas Company, United States District Court of South Carolina, Case No. 1:05-1509-MBS
- *Affidavit October 2007*, FERC Docket No. ER04-1421 and ER04-1422, Intervene in Open Access Transmission Tariff filed by Dominion Virginia Power
- *Affidavit February 26, 2008*, FERC Docket No. ER08-573-000 and ER08-574-000, Service Agreement between Dominion Virginia Power and WM Renewable Energy, LLC
- *Direct Filed Testimony* date December 15, 2006, before the Public Utility Commission of Texas, SOAH Docket No 473-06-2536, PUC Docket No. 32766
- *Expert Report and Direct Testimony* April 2008, United States Tax Court, Docket 25132-06, Entergy Corporation v. Commissioner Internal Revenue
- *Direct Testimony* September 17, 2009, Public Service Commission of the District of Columbia, Formal Case 1076, Reliability Issues
- *Filed Testimony regarding the prudence of hurricane restoration costs on behalf of the City of Houston, TX*, 2009, Cozen O’Connor P.C., TX PUC Docket No. 32093 – Hurricane Restoration Costs
- *Technical Assistance and Filed Comments regarding line losses and distributive generation, interconnection issues*, 2011, Office of the Ohio Consumer’s Counsel, OCC Contract 1107, OBM PO# 938 for Energy Efficiency T & D



KEVIN MARA

EXECUTIVE VICE PRESIDENT &
PRINCIPAL ENGINEER, P. E.

CONTACT

- 770-425-8100
- Kevin.mara@gdsassociates.com
- gdsassociates.com
- Marietta GA 30067

TESTIMONIES & DEPOSITIONS [continued]

- *Technical Assistance, Filed Comments, and Recommendations evaluating Pepco's response to Commission Order 15941* concerning worst reliable feeders in the District of Columbia, 2011, 2012 Office of the People's Counsel of the District of Columbia, Formal Case No. 766
- *Technical Assistance, Filed Comments, and Recommendations on proposed rulemaking by the District of Columbia PSC amending the Electric Quality of Service Standards (EQSS)*, 2011, Office of the People's Counsel of the District of Columbia, Formal Case No. 766
- *Yearly Technical Review, Filed Comments, and Recommendations evaluating Pepco's Annual Consolidated Report* for 2011 through 2024, Office of the People's Counsel of the District of Columbia, Formal Case Nos. 766; 766-ACR; PEPACR(YEAR)
- *Technical Evaluation, Filed Comments, and Recommendations evaluating Pepco's response to a major service outage occurring May 31, 2011.* (2011), Office of the People's Counsel of the District of Columbia, Formal Case Nos. 766 and 1062
- *Technical Assistance, Filed Comments, and Recommendations evaluating Pepco's response to Commission Order 164261 concerning worst reliable neighborhoods in the District of Columbia*, 2011, Office of the People's Counsel of the District of Columbia, Formal Case No. 766
- *Technical Review, Filed Comments, and Recommendations on Pepco's Incident Response Plan (IRP) and Crisis Management Plan (CMP)*, 2011, Office of the People's Counsel of the District of Columbia
- Formal Case No. 766
- *Technical Assistance, Filed Comments, and Recommendations assessing Pepco's Vegetation, Management Program and trim cycle* in response to Oder 16830, 2012, Office of the People's Counsel of the District of Columbia, Formal Case No. 766
- *Technical Review, Filed Comments, and Recommendations on Pepco's Secondary Splice Pilot Program* in response to Order 16426, 2012, Office of the People's Counsel of the District of Columbia, Formal Case No. 766 and 991
- *Technical Review, Filed Comments, and Recommendations on Pepco's Major Storm Outage Plan (MSO)*, 2012 – active, Office of the People's Counsel of the District of Columbia, Formal Case No. 766
- *Technical Assistance and Direct Filed Testimony for fully litigated rate case*, 2011-2012, Office of the People's Counsel of the District of Columbia, Formal Case No. 1087 – Pepco 2011 Rate Case, Hearing transcript date: February 12, 2012.
- *Evaluation of and Filed Comments on Pepco's Storm Response*, 2012, Office of the People's Counsel of the District of Columbia, Storm Dockets SO-02, 03, and 04-E-2012
- *Technical Assistance and Direct Filed Testimony for fully litigated rate case*, 2013 – 2014, Office of the People's Counsel of the District of Columbia, Formal Case No. 1103 – Pepco 2013 Rate Case. Hearing transcript date: November 6, 2013.
- *Evaluation of and Filed Comments on Prudence of 2011 and 2012 Storm Costs*, 2013 – 2014, State of New Jersey Division of Rate Counsel, BPU Docket No. AX13030196 and EO13070611



KEVIN MARA

EXECUTIVE VICE PRESIDENT &
PRINCIPAL ENGINEER, P. E.

CONTACT

- 770-425-8100
- Kevin.mara@gdsassociates.com
- gdsassociates.com
- Marietta GA 30067

TESTIMONIES & DEPOSITIONS [continued]

- *Technical Assistance and Direct Filed Testimony for DTE Acquisition of Detroit Public Lighting Department*, 2013 – 2014, Office of the State of Michigan Attorney General, Docket U-17437, Evaluation of and Filed Comments on the Siemens Management Audit of Pepco System Reliability and the Liberty Management Audit, 2014, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1076
- *Expert witness for personal injury case*, District of Columbia, Koontz, McKenney, Johnson, DePaolis & Lightfoot LLP, Ghafoorian v Pepco 2013 – 2016, Plaintiff expert assistance regarding electric utility design, operation of distribution systems and overcurrent protection systems.
- *Technical Assistance and Direct Filed Testimony in the Matter of the Application for approval of the Triennial Underground Infrastructure Improvement Projects Plan*, 2014 – 2017, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1116
- *Technical Assistance and Direct Filed Testimony in the Matter of the Merger of Exelon Corporation, Pepco Holdings, Inc., Potomac Electric Power Company, Exelon Energy Delivery Company, LLC and New Special Purpose Entity*, LLC, 2014 – 2016, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1119. Hearing transcript date: April 21, 2015.
- *Technical Assistance to Inform and advise the OPC in the matter of the investigation into modernizing the energy delivery system for increased sustainability*. 2015 – active, Office of the People’s Counsel of the District of Columbia, Formal Case No 1130.
- *Technical Assistance and Direct Filed Testimony in the Matter of the Merger of Exelon Corporation and Pepco Holdings, Inc.*, 2014 – 2016, State of Maryland and the Maryland Energy Administration, Case No. 9361.
- *Technical Assistance and Direct Filed Testimony for fully litigated rate case*, 2015 – 2016, State of Oklahoma Office of the Attorney General, Cause No. PUD 201500273 - OG&E 2016 Rate Case, Hearing transcript date: May 17, 2016.
- *Technical Assistance and Filed Comments on Notice of Inquiry, The Commission’s Investigation into Electricity Quality of Service Standards and Reliability Performance*, 2016 – 2018, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1076; RM36-2016-01-E.
- *Technical Assistance and Direct Filed Testimony for fully litigated rate case*, 2016 – 2017, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1139 – Pepco 2016 Rate Case. Hearing transcript date: March 21, 2017.
- *Technical Assistance in the Matter of the Application for approval of the Biennial Underground Infrastructure Improvement Projects Plan*, 2017- active, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1145
- *Technical Assistance to Inform and advise the OPC Regarding Pepco’s Capital Grid Project*, 2017 – active, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1144. Confidential Comments and Confidential Affidavit filed November 29, 2017.
- *Expert witness for personal injury case Mecklenburg County, NC, Tin, Fulton, Walker & Owen, PLLC, Norton v Duke, Witness testimony* December 1, 2017, Technical assistance and pre-filed Direct Testimony on behalf of the Joint Municipal Intervenors in a rate case before the Indiana Utility Regulatory Commission, Cause No. 44967. Testimony filed November 7, 2017.
- *Prefiled Direct Testimony and Prefiled Surrebuttal Testimony on behalf of the Vermont Department of Public Service in a case before the State of Vermont Public Utility Commission, Tariff Filing of Green Mountain Power Corp.*, Case No. 18-0974-TF. Direct Testimony Filed August 10, 2018. Surrebuttal Testimony Filed October 8, 2018.



KEVIN MARA

Docket No. 20250016-EI
Curriculum Vitae
Exhibit KJM-1
Page 5 of 6

EXECUTIVE VICE PRESIDENT &
PRINCIPAL ENGINEER, P. E.

CONTACT

770-425-8100
Kevin.mara@gdsassociates.com
gdsassociates.com
Marietta GA 30067

TESTIMONIES & DEPOSITIONS [continued]

- *Technical assistance and pre-filed Direct Testimony on behalf of McCord Development, Inc. and Generation Park Management District against CenterPoint Energy Houston Electric, LLC in a case before the State Office of Administrative Hearings of Texas, TX PUC Docket No. 48583. Direct Testimony filed April 5, 2019.*
- *Technical Assistance, Direct Filed Testimony, Rebuttal Testimony, Surrebuttal Testimony, and Supplemental Testimony for fully litigated rate case, 2019 – active, Office of the People’s Counsel of the District of Columbia, Formal Case No. 1156 – Pepco 2019 Rate Case. Direct Testimony Filed March 6, 2020. Rebuttal Testimony Filed April 8, 2020. Surrebuttal Testimony Filed June 1, 2020. Supplemental Testimony filed July 27, 2020.*
- *Technical assistance and pre-filed Direct Testimony on behalf of The State of Florida Public Counsel for Review of 2020-2029 Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Docket No. 20200071-EI, Gulf Power SPP. Direct Testimony filed May 26, 2020, Florida Power & Light Company SPP. Direct Testimony filed May 28, 2020.*
- *Prefiled Direct Testimony on behalf of the Vermont Department of Public Service in a case before the State of Vermont Public Utility Commission, Petition of Green Mountain Power for approval of its climate Plan pursuant to the Multi-Year Regulation Plan, Case No. 20-0276-PET. Direct Testimony Filed May 29, 2020.*
- *Technical assistance and Filed Comments on behalf of East Texas Electric Cooperative on a Proposal for Publication by the Public Utility Commission of Texas on Project 51841 Review of 16 TAC § 25.53 Relating to Electric Service Emergency Operations Plans, Project 51841. Comments filed January 4, 2022.*
- *Technical assistance, filed affidavit and direct testimony on behalf of Bloomfield, NM in an action concerning Bloomfield’s exercise of its right to acquire from Farmington the electric utility system serving Bloomfield, Bloomfield v Farmington, NM. State of New Mexico, County of San Juan, Eleventh Judicial District Court Action No. D-1116-CV-1959-07581.*
- *Technical assistance and pre-filed Direct Testimony on behalf of Sawnee EMC in a territorial dispute with Electrify America, Public Service Commission State of Georgia, Sawnee Electric Membership Corporation v Georgia Power Corporation, Docket No. 43899. Direct Testimony Filed September 9, 2021*
- *Prefiled Direct Testimony on behalf of the Vermont Department of Public Service in a case before the State of Vermont Public Utility Commission, Petition of Green Mountain Power for approval of a Multi-Year Rate Plan pursuant to 30 V.S.A. Sections 209, 218, and 218d, Case No. 21-3707-PET. Direct Testimony Filed April 20, 2022.*
- *Technical assistance and pre-filed Direct Testimony on behalf of The State of Florida Public Counsel for Review of Storm Protection Plans pursuant to Rule 25-6.030, F.A.C., all testimony filed May 31, 2022*
 - Docket No. 20220048-EI Tampa Electric Company
 - Docket No. 20220049-EI Florida Public Utilities Company
 - Docket No. 20220050-EI Duke Energy Florida
 - Docket No. 20220051-EI Florida Power & Light
- *Technical assistance and pre-filed Direct Testimony on behalf of The State of Florida Public Counsel for Review of Storm Protection Plan Cost Recovery Clause, Docket No. 20220010-EI. Testimony filed September 2, 2022*



KEVIN MARA

EXECUTIVE VICE PRESIDENT &
PRINCIPAL ENGINEER, P.E.

Docket No. 20250016-EI
Curriculum Vitae
Exhibit KJM-1
Page 6 of 6

CONTACT

-  770-425-8100
-  Kevin.mara@gdsassociates.com
-  gdsassociates.com
-  Marietta GA 30067

TESTIMONIES & DEPOSITIONS [continued]

- *Prefiled Direct Testimony on behalf of the Vermont Department of Public Service in a case before the State of Vermont Public Utility Commission, Petition of Green Mountain Power for approval of its zero outages initiative as a strategic opportunity pursuant to 30 V.S.A. § 218d and GMP's multi-year rate plan, Case No. 23-3501-PET. Direct Testimony Filed March 15, 2021.*
- *Prefiled Direct Testimony and Rebuttal Testimony on behalf of South Carolina Office of Regulatory Staff with the Public Service Commission of South Carolina, regarding Duke Energy Carolinas, LLC's Application for Increase in Electric Rates, Adjustments in Electric Rate Schedules and Tariffs, and Request for an Accounting Order, Docket No. 2023-388-E and 2023-403-E. Direct Testimony Filed April 8, 2024. Rebuttal Testimony Filed April 29, 2024.*
- *Technical assistance and pre-filed Direct Testimony on behalf of The State of Florida Public Counsel in a case before the Florida Public Service Commission, Petition for Rate Increase by Duke Energy Florida, LLC, Docket No. 20240025-EI. Direct Testimony filed June 11, 2024.*
- *Technical assistance and pre-filed Direct Testimony on behalf of The State of Florida Public Counsel in a case before the Florida Public Service Commission, Petition for Rate Increase by Tampa Electric Company, Docket No. 20240026-EI. Direct Testimony filed June 6, 2024.*



**TAMPA ELECTRIC COMPANY
DOCKET NO. 20250016-EI
STAFF'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 1
BATES PAGE(S): 1-2
MARCH 6, 2025**

For the following questions, please refer to the direct testimony of TECO's witness Palladino filed January 15, 2025.

1. Please refer to page 9, line 15 through page 10, line 15. Witness Palladino explained that of the 55 circuits that had faults, 27 of those circuits had Gang Operated Air Break (GOAB) switches.
 - a. Are the other 28 circuits that experienced faults already equipped with SCADA? If not, please explain why they are not targets for the new proposed program.
 - b. The proposed program appears to target 250 GOAB equipped transmission switches. Is this correct? If not, please explain.
 - c. Does the order of replacement of the GOAB switches prioritize the circuits serving critical infrastructure such as hospitals, police stations, and fire stations, etc.? If not, please explain.
 - d. Please explain TECO's rationale for completing this program within four years. As part of your response, please explain if a five or six year timeframe to complete this program was considered.

Answer:

- a. Yes, the other 28 circuits that experienced faults are already equipped with SCADA enabled switches and were not included in the Transmission Switch Hardening ("TSH") program.
- b. In the direct testimony of witness Palladino, filed on January 15, 2025 (DN# 00266-2025), Mr. Palladino stated that 250 GOAB switches were being upgraded in the TSH program. The intent was to convey that 250 is the total number of GOAB switches on Tampa Electric's transmission system. Of the 250 GOAB switches, 153 are being evaluated for an upgrade to SCADA capability through the TSH program, while the remaining 97 GOAB switches already have SCADA capability.
- c. No, it's not possible to prioritize this work by critical circuits because the customers are not directly served by the transmission system, so it's not possible to prioritize based on the end users. Tampa Electric will install these switches on the transmission system, and critical infrastructure facilities such as hospitals, police stations, and fire stations are served by distribution system. This program will still directly benefit critical infrastructure because it will provide greater operational flexibility and grid

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20250016-EI
STAFF'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 1
BATES PAGE(S): 1-2
MARCH 6, 2025**

resiliency by increasing the number of remotely operable switching points. This will allow the company to reconfigure the transmission grid to isolate faults and restore service to larger portions of the distribution system more quickly. Tampa Electric would also note that it prioritizes *restoration* of service to distribution circuits serving critical infrastructure facilities following a storm.

- d. Tampa Electric considers several factors when evaluating the pace of work for an SPP program. These factors include: (1) the amount of work that can be safely and efficiently executed by our contract partners and overseen by the Storm Protection Plan ("SPP") operations; (2) the volume of work the company can complete at one time without overstressing the system; (3) the budget impacts of various program lengths; (4) contractor availability; and (5) the level of work necessary to obtain competitive pricing from contractors.

The company did not consider a five- or six-year time frame because 50 switches per year is the pace that allows for sufficient oversight and for the work to be bid at a volume that would promote advantageous pricing for engineering and construction services. Slowing the pace of the program would delay these benefits and potentially increase costs and risks.

A F F I D A V I T

STATE OF FLORIDA)
)
COUNTY OF HILLSBOROUGH)

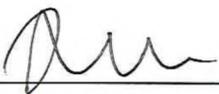
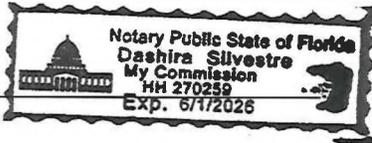
Before me the undersigned authority personally appeared Kevin E. Palladino who
deposed and said that he Manager of Storm Protection Program Engineering & Customer
Outreach, Tampa Electric's answers to the interrogatories specified below were prepared
by him and/or under his direction and supervision and are true and correct to the best of
his information and belief.

STAFF'S 1ST INTERROGATORIES (NOS. 1-2)

Dated at Tampa, Florida this 25 day of February 2025



Sworn to and subscribed before me this 25 day of February 2025


_____ 

My Commission expires 6/1/2026

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20250016-EI
STAFF'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 2
BATES PAGE(S): 3-4
MARCH 6, 2025**

2. Please refer to page 10, line 17 page 11, line 13. Witness Palladino explained that TECO has approximately 520 pad-mounted live front distribution switchgears and 12,000 pad-mounted transformers located in flood evacuation zones A, B, and C. Of these, 13 switchgears and 185 transformers experienced damage due to storm surge from Hurricanes Helene and Milton.
- a. Since only 13 of 520 pad-mounted switchgears and 185 of 12,000 pad-mounted transformers were damaged, please explain why this program could not be accomplished during regular operation and maintenance (O&M) timelines?
 - b. Please explain the necessity to accomplish this program within three years. As part of your response, please explain if four, five, or six year timeframes to complete this program were considered.
 - c. Appendix H, Exhibit No. KEP-1, indicates 174 structures will be replaced by the proposed Distribution Storm Surge Hardening Program in 2026. What are the projected number of structures to be replaced 2027 and 2028, and the associated project costs for those years?

Answer:

- a. The company could replace the existing non-submersible switchgears through the company's regular asset management program; however, the asset management program does not replace equipment until its capacity degrades, which can be 20-25 years. The timeline for completing the replacement through asset management would accordingly be significantly longer than it would be through the proposed Distribution Storm Surge Hardening ("DSSH") program and would not mitigate risk from extreme weather. The DSSH would proactively replace non-submersible switchgears before their performance degrades.

Tampa Electric sustained damage to 13 switchgears and 185 transformers as result of Hurricane Helene. The eye of Hurricane Helene was approximately 100 miles offshore when it passed Tampa Electric's service area. Despite this distance, damage was still sustained. Hurricane Helene underscores the risk posed to Tampa Electric's distribution system from future storms which may track closer to the company's service area.

- b. Tampa Electric considers several factors when evaluating the pace of work for an SPP program. These factors include: (1) the amount of work that can be safely and efficiently executed by our contract partners and overseen by

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20250016-EI
STAFF'S FIRST SET OF
INTERROGATORIES
INTERROGATORY NO. 2
BATES PAGE(S): 3-4
MARCH 6, 2025**

the Storm Protection Plan ("SPP") operations; (2) the volume of work the company can complete at one time without overstressing the system; (3) the budget impacts of various program lengths; (4) contractor availability; and (5) the level of work necessary to obtain competitive pricing from contractors.

The three-year timeline selected for this program was based on one crew working full-time replacing switchgears at a pace of approximately four switchgears per week. Three years is the minimum timeline it would take for a single dedicated crew to complete all switchgear replacements. The company proposed this timeline because it will result in several strategic advantages, including greater contractor efficiency gained through repetition; improved safety and contractor oversight; and a greater likelihood that the crew will complete the work on schedule since this program will be the crew's sole focus. This pace of work, combined with the transformer work, would allow the company to bid out this work at a volume that is more likely to lead to favorable pricing than a lower volume of work. The company did not consider a four, five- or six-year time frame because it would delay these benefits and potentially increase costs and risks.

Once the company decided on a three-year timeline, it was determined that the transformer upgrades should be completed on the same timeline. This will allow the company to coordinate all DSSH Program work in each area, improve contractor oversight, and keep costs competitive as one contractor could bid on both sets of work. The transformer work would require a dedicated crew to accomplish the work at the same time as the switchgear component. The same advantages exist for this volume as the switchgear volumes.

- c. For 2027 and 2028, the company plans to replace 174 switchgears annually at a cost of \$11,310,000 per year.

A F F I D A V I T

STATE OF FLORIDA)
)
COUNTY OF HILLSBOROUGH)

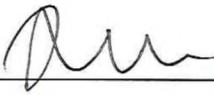
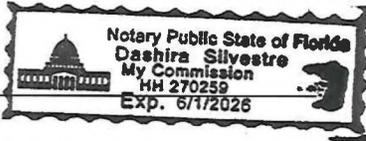
Before me the undersigned authority personally appeared Kevin E. Palladino who deposed and said that he Manager of Storm Protection Program Engineering & Customer Outreach, Tampa Electric's answers to the interrogatories specified below were prepared by him and/or under his direction and supervision and are true and correct to the best of his information and belief.

STAFF'S 1ST INTERROGATORIES (NOS. 1-2)

Dated at Tampa, Florida this 25 day of February 2025



Sworn to and subscribed before me this 25 day of February 2025


_____ 

My Commission expires 6/1/2026