27

TECO's response to staff's first set of interrogatories, Nos. 1-6

(No. 6 has an attachment)

TAMPA ELECTRIC COMPANY
DOCKET NO. 20210010-EI
STAFF'S FIRST SET OF INTERROGATORIES
INTERROGATORY NO. 1
BATES PAGE: 1
FILED: MAY 20, 2021

1. Please refer to Witness David Plusquellic's April 1, 2021 testimony at page 5. Please explain why Tampa Electric Company (TECO) ". . . was only able to begin construction on one project in 2020 and made less progress in construction than originally projected."

A. Tampa Electric originally projected five Distribution Lateral Underground Program projects to start construction in 2020. At the time of the projection filing (July 24, 2020), the company believed that all contractor partners would be able to ramp-up engineering and the obtainment of easements and permits at the same pace and schedule. Four of these projects were assigned to a new contractor partner that had not previously done work for Tampa Electric. This contractor partner was delayed in beginning the design and subsequent easement and permitting process and was unable to complete these processes to start construction in 2020. These four projects started construction in the first quarter of 2021.

TAMPA ELECTRIC COMPANY
DOCKET NO. 20210010-EI
STAFF'S FIRST SET OF INTERROGATORIES
INTERROGATORY NO. 2
BATES PAGES: 2-3
FILED: MAY 20, 2021

2. Please refer to Witness David Plusquellic's April 1, 2021 testimony at pages 7, 10, and 15. Witness Plusquellic notes that the reason for program achievements variances relative to projections was that resources were allocated to mutual assistance support for several weeks for the Transmission Asset Program, Distribution Overhead Feeder Program, and Vegetation Management Program.

a. Please describe TECO's Storm Protection Plan program forecasting process and use of contingency factors in addressing uncertainty associated with weather events within TECO's system and off-system.

b. Does TECO use the same forecasting process and contingency factors for all of its programs regardless of whether a program may be included in a clause? If not, please explain why and describe the differences.

A. a. Tampa Electric works very closely with the company's internal and external partners to develop a schedule based upon several factors. These factors include normal weather, historical and projected productivity levels, volume of work-load, and projected expected crew and resource availability. These factors were collectively factored into Tampa Electric's 2020-2029 Storm Protection Plan ("SPP") and the company's Storm Protection Plan Cost Recovery Clause ("SPPCRC") projection filing that was filed on July 24, 2020.

As more information becomes known due to unforeseen impacts throughout the year, the original schedule will be adjusted taking these impacts into consideration. These adjustments will look at the potential of catchup work based upon any requirements that exist for the completion of work or other situations which would require the work to be completed in a shorter timeframe (due to this loss of workdays) to meet electrical system requirements or the need for the electrical system to be in a specific configuration.

Specifically for the 2020 Hurricane Season, the initial seasonal forecasts called for a slightly above average season. Nothing in this initial seasonal forecast would have indicated that an adjustment would need to be made to the work schedules for 2020 until the mid-season forecast during the summer. As that information became known and Tampa Electric started releasing contractors for mutual aid assistance for other utilities, the company began adjusting the schedule described above with attempts to

adjust internal and external resources, timing and schedules to minimize the impact.

b. All SPP programs use a similar process as described in Response No. 2a above. As for a current example: adjustments have already been made to the 2021 work plan for Transmission Asset Upgrades and Distribution Overhead Feeder Hardening to account for the forecast that the 2021 Hurricane Season is expected to have above average activity. With this information, Tampa Electric has a contingency plan to meet program goals with the potential for a projected loss or reduced productivity for a period of six weeks. Similar discussions are also planned in the coming weeks for Tampa Electric Vegetation Management and Distribution Lateral Underground programs.

TAMPA ELECTRIC COMPANY
DOCKET NO. 20210010-EI
STAFF'S FIRST SET OF INTERROGATORIES
INTERROGATORY NO. 3
BATES PAGE: 4
FILED: MAY 20, 2021

3. Please refer to Witness David Plusquellic's April 1, 2021 testimony at page 15 addressing overtime pay for transmission vegetation management work.

a. How often within the past five years has TECO recorded non-storm restoration related overtime pay for transmission vegetation management work?

b. Does TECO have a policy or guidance document pertaining to the authorization of non-storm restoration overtime pay for transmission vegetation management work? If yes, please identify that document. If not, please explain why not.

A. a. Tampa Electric does not specifically track non-storm related overtime for the company's transmission vegetation management ("VM") work.

b. Tampa Electric does not have a policy or guiding document pertaining to the authorization of non-storm overtime pay for transmission VM work.

The reason why the company does not have a policy or guiding document pertaining to the company's transmission VM work, as it relates to the authorization of non-storm overtime pay, is that Federal regulatory requirements and resource availability drive Tampa Electric's transmission VM plan and schedule.

TAMPA ELECTRIC COMPANY
DOCKET NO. 20210010-EI
STAFF'S FIRST SET OF INTERROGATORIES
INTERROGATORY NO. 4
BATES PAGE: 5
FILED: MAY 20, 2021

4. Please refer to Witness David Plusquellic's April 1, 2021 testimony at page 17 addressing the Transmission Aerial Infrared Patrol.

a. What percentage of the 2020 planned Transmission Aerial Infrared Patrol was completed in 2020?

b. Has TECO suspended its Transmission Aerial Infrared Patrols?

c. Did TECO consider alternative infrared patrols of its transmission system? If not, why?

A. a. Tampa Electric did not complete any of the planned 2020 Transmission Aerial Infrared Patrol due to the COVID pandemic.

b. Tampa Electric is planning on initiating the company's Transmission Aerial Infrared Patrol once the restrictions of working face-to-face due to the COVID pandemic are released.

c. Yes, Tampa Electric performed Ground based Infrared inspections on portions of the Transmission system that were of interest.

TAMPA ELECTRIC COMPANY
DOCKET NO. 20210010-EI
STAFF'S FIRST SET OF INTERROGATORIES
INTERROGATORY NO. 5
BATES PAGES:6-7
FILED: MAY 20, 2021

5. Please refer to the testimony of Mark Roche, Exhibit MRR-1, Schedule A-5, page 1 of 2.

a. Please provide the monthly additions and retirements, by account, for the assets reflected in the calculation of Depreciation Expense for the Transmission Asset Upgrades on Line 2.1.

A. a. Tampa Electric is providing the Excel Spreadsheet titled, "(BS 7) DR-5.xlsx", that provides the monthly additions and retirements, by account, for the assets reflected in the calculation of net Depreciation Expense (depreciation less depreciation savings) for the Transmission Asset Upgrades.

TAMPA ELECTRIC COMPANY
DOCKET NO. 20210010-EI
STAFF'S FIRST SET OF INTERROGATORIES
INTERROGATORY NO. 6
BATES PAGE: 8
FILED: MAY 20, 2021

6. Please refer to the testimony of Mark Roche, Exhibit MRR-1, Schedule A-7, page 2 of 18.

a. Please provide the retirement amounts, by month and account, for the assets reflected in the calculation of Depreciation Savings for the Transmission Asset Upgrades on Line 8.b.

A. a. Please see the Excel spreadsheet provided in Response No. 5a. above, rows 11 through 13 for retirements related to the depreciation savings calculation for the Transmission Asset Upgrades.