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February 11, 1997

HAND DELIVERED

Ms. Blanca S. Bayo, Director
Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Proposed Amendment of Rule 25-17.015, F.A.C.,
Conservation Cost Recovery; FPSC Docket No. 961378-EG

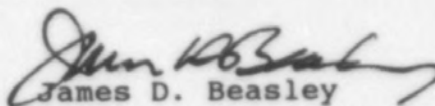
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Post Workshop Comments.

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

- ACK _____
- AFA _____
- APP 1 _____
- CAF JDB/pp _____
- CAF Enclosures _____
- CMU _____
- CTR _____
- EAG _____
- LEG _____
- LIN _____
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FPSC-BUREAU OF RECORDS

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FPSC-RECORDS/REPORTING

Tampa Electric Company submits the following comments to Docket No. 961378-EG- Proposed Amendment of Rule 25-17.015, F.A.C., Energy Conservation Cost Recovery.

1. Tampa Electric Company continues to support the time line change proposed by Gulf Power. As we stated at the workshop held on January 14, 1997, the proposed time line helps to levelize the ECCR work for both the Commission audit staff and the company. Specifically, the audit staff will have additional time to perform the verification functions associated with their work on a utility's true-up filing. From the utility's perspective, the same company staff is utilized to assist with the ECCR audit, complete the true-up filing and prepare the projection filing for submission. Therefore, by adopting the proposed time line, the utility is better able to assist with the audit while still submitting the various filings in a timely manner.

Also, the proposed time line would not change the number of months that are projected in the current projection filing. It would remain at 16 months. This protects against the need for any mid-course corrections that have a greater propensity of occurrence should the number of projected months be lengthened.

As for staleness of data being filed under the proposed time line, Tampa Electric Company does not see this as an issue. Currently, utilities submit a final true-up for the 12-month period ending September 30 by mid-November of each year. The field audit work for that same period is then completed in December. Under the proposed time line, a final true-up for a 12-month period that ended March 31 would be filed by mid-June with the field audit work commencing in July. Therefore, stale information should not be an issue.

For these reasons, Tampa Electric Company urges adoption of Gulf's proposed time line.

2. Concerning paragraph (3), the primary reason given at the workshop for adding a list of account and subaccount numbers as a filing requirement was to assist the Commission audit staff with their initial work associated with the on-site audit of a utility's true-up filing. However, historic and current practices indicate their audit work typically begins one to two months prior to the true-up filing deadline. Therefore, the need of the audit staff still will not be fulfilled.

Tampa Electric wants to be sensitive to the needs of the audit staff. Since account and subaccount numbers are vital to the audit process and that process typically begins well in advance of a true-up filing deadline, then perhaps the adoption of the Gulf time line would resolve the issue. The time line would provide ample opportunity for the on-site audit to occur subsequent to the true-up filing deadline. This would then allow the list of account and subaccount numbers that are proposed to accompany the true-up filing be ready for use by the audit staff upon arrival at the utility's site.

Additionally, the audit staff would have in hand the completed and submitted true-up filing. This would seem to be an added benefit since current practice finds the utility generally providing the audit staff with sections of the total filing on an as-completed basis

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FPSC-RECORDS/REPORTING

due to the simultaneous occurrence of final true-up preparation and field audit facilitation which utilizes the same utility personnel.

Tampa Electric Company realizes a six month shift from the Commission's present practice is necessary to accommodate the proposed time line change. We believe this can be handled smoothly and would welcome the opportunity to work with Staff on the transition.