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ORIGINAL  
FILE COPY

August 6, 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., Energy  
Conservation Cost Recovery; Docket No. 961378-EG

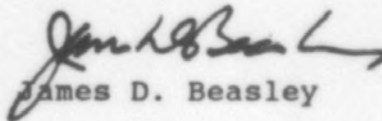
Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and  
fifteen (15) copies of Tampa Electric Company's Written Comments on  
Proposed Rule Amendments.

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 1 \_\_\_\_\_
- APP 1 \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG 1 \_\_\_\_\_
- LEG \_\_\_\_\_
- LIN \_\_\_\_\_
- OPC \_\_\_\_\_
- RCH 1 \_\_\_\_\_
- SEC 1 \_\_\_\_\_
- WAS \_\_\_\_\_
- OTH \_\_\_\_\_

JDB/pp  
Enclosures

DOCUMENT NUMBER-DATE

08028 AUG-6 5

FPSC-RECORDS/REPORTING

FILE COPY

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Amendment of )  
Rule 25-17.015, F.A.C., Energy )  
Conservation Cost Recovery. )

DOCKET NO. 961378-EG  
FILED: August 6, 1997

TAMPA ELECTRIC COMPANY'S  
WRITTEN COMMENTS ON PROPOSED RULE AMENDMENTS

Tampa Electric Company ("Tampa Electric" or "the company") submits the following written comments in response to the Notice of Rulemaking issued July 24, 1997 in the above docket, and says:

1. Tampa Electric has reviewed the draft rule amendments in the above docket and believes that subsection (4) of the proposed rule is in need of clarification. The present subsection (4) reads as follows:

(4) New programs or program modifications must be approved prior to cost recovery. New incentives or rebates may not be recovered if paid before their approval as part of a new program or program modification. Other program implementation costs associated with new programs or program modifications may be recovered if the program modification or new program is approved before cost recovery and the Commission determines that the expenditure of such costs was prudent.

2. Tampa Electric would recommend that subsection (4) of the rule be modified as follows:

(4) New programs or program modifications must be approved prior to a utility seeking cost recovery. Specifically, any incentives or rebates associated with these new or modified programs may not be recovered if paid before approval. However, if a utility incurs prudent developmental or other implementation costs, these expenditures may be recovered before the new programs or modifications have been approved by the Commission.

DOCUMENT NUMBER-DATE

08028 AUG-65

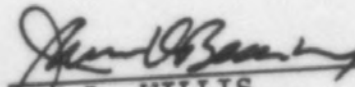
FPSC-RECORDS/REPORTING

3. Tampa Electric believes that with the foregoing revision to proposed subsection (4) the rule will be clearer and more effective for all parties concerned.

WHEREFORE, Tampa Electric Company submits the foregoing suggested revision to the language of subsection (4) of the subject proposed rule revision.

DATED this 6<sup>th</sup> day of August, 1997.

Respectfully submitted,



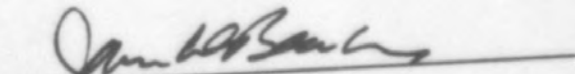
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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Comments of Tampa Electric Company have been furnished by U. S. Mail or hand delivery (\*) on this 6<sup>th</sup> day of August, 1997 to the following:

Mary Ann Helton\*  
Staff Counsel  
Division of Legal Services  
Florida Public Service  
Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

  
ATTORNEY