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ORIGINAL

December 21, 2000

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RECORDS AND REPORTING

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

Re: In re: Amendments to Rule 25-17.0832, F.A.C., Firm Capacity and Energy Contracts; FPSC Docket No. 001574-EQ

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,

RECEIVED & FILED

Monte Roberts
FPSC-BUREAU OF RECORDS

James D. Beasley
James D. Beasley

[Signature]
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Enclosures
cc: All Parties of Record (w/enc.)
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FPSC-RECORDS/REPORTING

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Proposed Amendments to Rule)
25-17.0832, F.A.C., Firm Capacity and)
Energy Contracts.)
_____)

DOCKET NO. 001574-EQ
FILED: December 21, 2000

**TAMPA ELECTRIC COMPANY'S
POST-WORKSHOP COMMENTS**

Tampa Electric Company ("Tampa Electric" or "the company") submits the following post-workshop comments concerning Staff's proposed amendments to Rule 25-17.0832:

1. Tampa Electric supports Staff's proposed amendments to Rule 25-17.0832 governing firm capacity and energy contracts. As the Staff pointed out at the December 12 workshop in this docket, the proposed rule revisions were prompted by the Commission's recent observation that a number of investor-owned utilities had been requesting rule waivers to reduce the ten year term presently specified in the rule to a five year contract term. Tampa Electric was one of those utilities.

2. As the Staff pointed out at the workshop, the contract term language initially adopted in the rule was selected to accommodate the planning and construction lead time associated with the type of generating plant the utilities were constructing when the rule was adopted. Certainly the planning and construction period associated with the smaller gas-fired units being utilized today is more consistent with a five year term, as opposed to the ten year term adopted back when utilities were constructing larger coal-fired base load plants. Nothing on the horizon would appear to warrant a standard offer contract extending beyond the proposed five year period. Thus, adopting this rule amendment would conform the rule to present day reality and obviate the need for utilities to seek rule waivers.

3. Limiting standard offer contracts to a five year term would also help utility customers reduce their risk of being locked into standard offer contracts that turn out to be significantly more costly than other power supply alternatives. Recent history has demonstrated that longer term full avoided cost based standard offer contracts can lead to just such a result.

4. Based on the foregoing, Tampa Electric believes the revisions proposed by Staff should be adopted.

DATED this 21st day of December 2000.

Respectfully submitted,



LEE L. WILLIS
JAMES D. BEASLEY
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Tallahassee, FL 32302
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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Post-Workshop Comments, filed on behalf of Tampa Electric Company, has been furnished by hand delivery (*) or U. S. Mail on this 21st day of December 2000 to the following:

Ms. Mary Anne Helton*
Staff Counsel
Division of Appeals
Florida Public Service Commission
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