ORIGINAL

AUSLEY & MCMULLEN

ATTORNEYS AND COUNSELORS AT LAW

227 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

050058-EI

January 25, 2005

HAND DELIVERED

RECEIVED-FPSC
05 JAN 25 PM 3:57
COMMISSION
CLERK

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

Re: Request of Tampa Electric Company to Exclude Outage Event on December 26, 2004 from its Annual Distribution Service Reliability Report

Dear Ms. Bayo:

Enclosed for filing in the above-styled matter are the original and fifteen (15) copies of Tampa Electric Company's Request to Exclude Outage Events from Distribution Reliability Reporting.

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

JDB/pp
Enclosure

RECEIVED & FILED
FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE
00902 JAN 25 05
FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Request of Tampa Electric Company to Exclude Outage Event on December 26, 2004 from its Annual Distribution Service Reliability Report	)))))	DOCKET NO. _____ FILED: January 25, 2005

TAMPA ELECTRIC COMPANY'S
REQUEST TO EXCLUDE OUTAGE EVENT
FROM DISTRIBUTION RELIABILITY REPORTING

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Rule 25-6.0455(3), Florida Administrative Code, hereby requests the Florida Public Service Commission ("the Commission") to approve the exclusion from the company's Annual Distribution Service Reliability Report for calendar year 2004 of an outage event on December 26, 2004, resulting from a severe weather system described herein. In support of its request, Tampa Electric states as follows:

1. Tampa Electric is a public utility subject to the regulatory jurisdiction of the Commission pursuant to Chapter 366, Florida Statutes. The company's principal place of business is located at 702 North Franklin Street, Tampa, Florida 33601.

2. All notices, pleadings and correspondence required to be served on Tampa Electric should be directed to:

Lee L. Willis
James D. Beasley
Ausley & McMullen
Post Office Box 391
Tallahassee, FL 32302
(850) 224-9115

Angela L. Llewellyn
Administrator, Regulatory Coordination
Tampa Electric Company
Post Office Box 111
Tampa, FL 33601-0111
(813) 228-1752

3. Commission Rule 25-6.0455(1), Florida Administrative Code, requires utilities to file an Annual Distribution Service Reliability Report for each calendar year by March 1 of the following year. The Report provides extensive distribution outage event data and related calculations of reliability indices, as specified in Commission Forms PSC/ECR 102-1 and 102-3. Section (2) of the Rule allows a utility to exclude from its Annual Distribution Service Reliability Report outage events caused by certain enumerated conditions. Finally, Subsection (3) of the Rule provides that a utility may also request the exclusion of an outage event not specifically enumerated in Subsection (2) from its Report, and goes on to state: "The Commission will approve the request if the utility is able to demonstrate that the outage was not within the utility's control, and that the utility could not reasonably have prevented the outage." This request by Tampa Electric is submitted for Commission approval pursuant to the provisions of Subsection (3).

Details of the Outage Event

4. The outage event that is the subject of this request occurred during the pre-dawn hours of December 26, 2004, and resulted from abnormally excessive winds caused by an unusually strong pressure gradient attributed to a frontal trough. This weather condition caused widespread outages within the Tampa Electric service area. During this event the Tampa Bay area experienced very heavy winds which were 20 miles per hour stronger than any other recorded for the month during the past five years. The sustained high winds began impacting the area at approximately 4:00 a.m. and did not subside until 6:00 a.m. on the morning of December 26, 2004.

Impact of the Outage Event

5. Abnormally strong winds caused extensive outages which affected Tampa Electric's annual distribution reliability SAIDI index. This resulted in 5.68 minutes of SAIDI over the period compared to a five-year December daily average of 0.11 minutes or 51.6 times greater than a normalized December day (see Figure 1 – Storm Indices Comparison to Five-year Average). This storm caused 126 outages which spanned 17 separate distribution circuits and impacted 21,153 customers. The 126 outages necessitated 56 crew job assignments with each crew assignment requiring multiple personnel to complete extensive repairs to restore power. Field damage assessment reports reveal that the high winds blew trees and vegetation into circuits causing a host of downed power lines.

Figure 1: Storm Indices Comparison to Five-year Average

	December 26, 2004	Daily December (5 Yrs Avg.)
SAIDI (minutes)	5.68	0.11
Interruptions	126	21.70
Customers Interrupted	21,153	1,175

The December 26 storm severely impacted the Tampa Bay Area and caused various wind-related damage to private property. Details of the storm and its impact within Tampa Electric's service area are contained in the report entitled December 26, 2004 Weekend Tampa Wind Event, prepared by Impact Weather, attached hereto as Exhibit "A".

6. Tampa Electric subscribes to the Hurricane and Severe Weather service provided by Impact Weather, Inc. Impact Weather is a wholly owned subsidiary of Universal Weather & Aviation, Inc. which was founded in 1959 and employs over 60 professional meteorologists who

are experienced in global weather patterns and forecasting. This organization provides critical weather information to utility and non-utility clients throughout the country and world. Tampa Electric was very dependent on Impact Weather during this past hurricane season and found that their forecasts were critical to our emergency planning and restoration activities. In addition, Impact Weather provides winter planning forecasts which play key roles in balancing the company's daily operational forecasts.

Tampa Electric's Response

7. In response to the high level of customer service interruptions caused by the abnormally severe wind storm on December 26th, Tampa Electric mobilized active and off duty line distribution crews, equipment and support vehicles, management and supervisory personnel and support staff that were available to restore service. Figure 2, below, is a schedule providing an actual listing of the personnel involved in the response.

Figure 2: Response Personnel

Management and Supervision	9
Staff Support	8
Line Resources	70
Total Personnel	87

Tampa Electric utilized every available means following this unusual weather event to restore electric service as safely and as promptly as possible, with service having been restored in an orderly, expeditious manner.

Qualification for Outage Exclusion

8. Tampa Electric's service area experienced severe weather on December 26, 2004 that significantly affected the company's reliability indices. Including the effects of this severe weather in Tampa Electric's reported indices would unreasonably distort the true picture of Tampa Electric's distribution service reliability. The outage event described herein clearly

appears to be the type of event that qualifies for exclusion under Rule 25-6.0455(3), Fla. Admin. Code, in that it was not within Tampa Electric's control and the company could not reasonably have prevented the resulting service outages.

WHEREFORE, for the reasons set forth above, Tampa Electric respectfully requests that the Commission grant this request and approve the exclusion of the outage event of December 26, 2004 from the company's reliability indices reported in the company's Distribution Service Reliability Report for Calendar Year 2004.

DATED this 25th day of January 2005.

Respectfully submitted,

LEE L. WILLIS
JAMES D. BEASLEY
Ausley & McMullen
Post Office Box 391
Tallahassee, FL 32302
(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

h:\jdb\tec\outage events exlusion 12-26-04 - hb edits.doc

Tampa Electric Company

Report on Severe Weather Event
December 26, 2005

Prepared by: Impact Weather, Inc.

EXHIBIT "A"

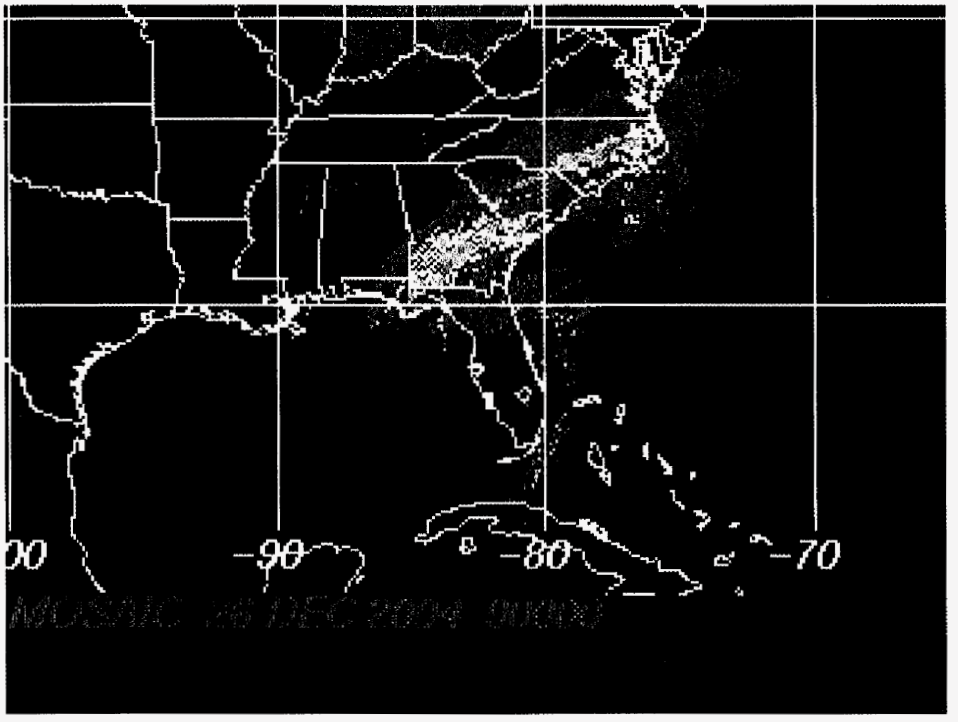
December 26, 2004 Weekend Tampa Wind Event

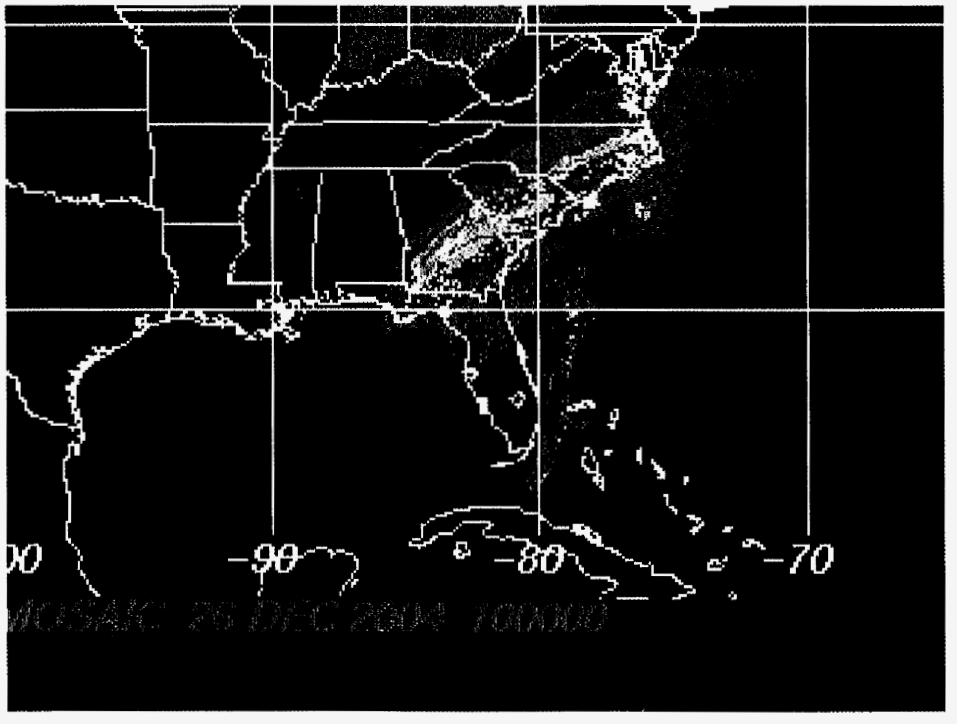
Overview

A band of high winds associated with a strong arctic cold front moved through the Tampa Electric service area before dawn on December 26th, 2004. The event lasted about 90 minutes, depending on the location, and was evidently caused by an unusually strong pressure gradient attributed to the frontal trough. It is also possible that a low pressure wave developed along the front, enhancing the wind in the central and southern Florida area before moving quickly off to the northeast.

Not Convective

Only a trace of rain was officially reported at Tampa. Here are radar plots from that morning, 0400EST and 0500EST.





No lightning was observed and very little precipitation. Given that excessive winds are almost always associated with strong convection (thunderstorms) in this part of the country, damage from pressure-gradient-related wind is quite rare.

Storm Reports and Damage

Although no damage reports were turned in to the Storm Prediction Center, there were several local storm reports. Highest sustained winds and gusts seemed to be nearest the west coast.

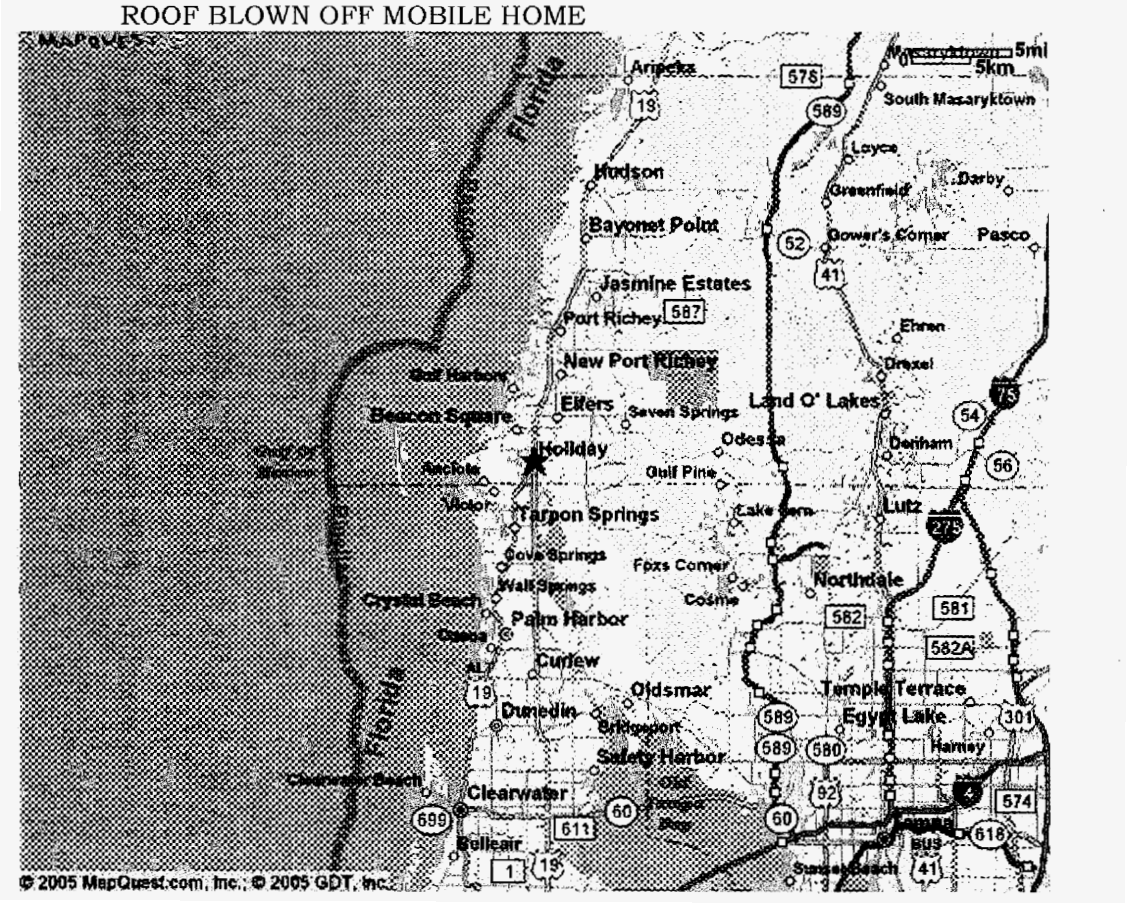
In Holiday (Pasco County):

0405 AM NON-TSTM WND DMG HOLIDAY 28.19N 82.74W
12/26/2004 PASCO FL PUBLIC

MINOR DAMAGE TO A MOBILE HOME PARK.

0500 AM NON-TSTM WND DMG HOLIDAY 28.19N 82.74W
12/26/2004 PASCO FL TRAINED SPOTTER

ROOF BLOWN OFF MOBILE HOME



And farther south in Bradenton (Manatee County):

0430 AM NON-TSTM WND DMG 4 S BRADENTON 27.43N 82.58W

12/26/2004 MANATEE FL EMERGENCY MNGR

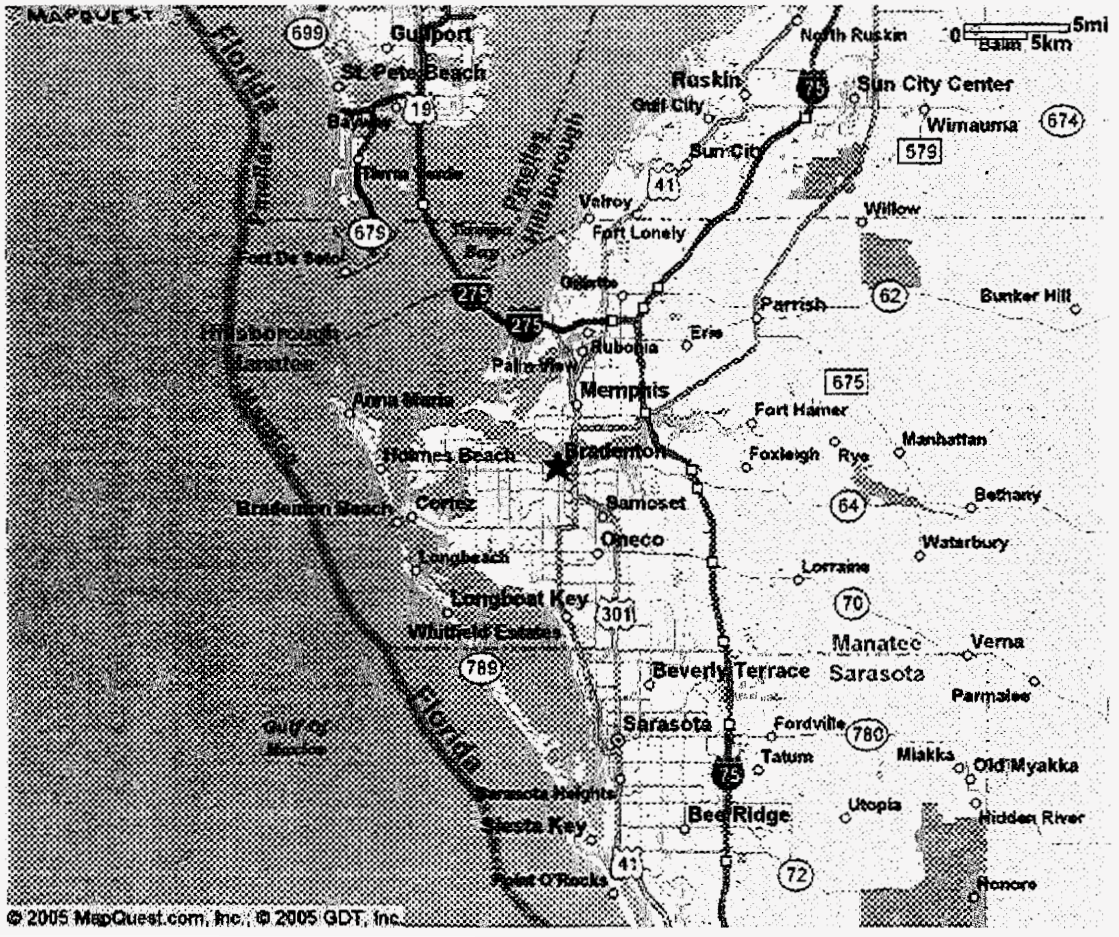
ROOF BLOWN OFF A SHED

0500 AM NON-TSTM WND DMG 2 E BRADENTON BCH 27.46N 82.67W
12/26/2004 MANATEE FL EMERGENCY MNGR

ROOF DAMAGE AND DEBRIS FOR 2 MOBILE HOMES.

0530 AM NON-TSTM WND DMG BRADENTON 27.49N 82.58W
12/26/2004 MANATEE FL EMERGENCY MNGR

POWER LINES DOWN. 1200 FPL CUSTOMERS WITHOUT POWER...INCLUDING WOODLANDS ASSISTED LIVING FACILITY.



The event was felt over a wide area of Florida, as evidenced by this report from Vero Beach on the east coast a little later in the period.

0624 AM NON-TSTM WND GST VERO BEACH 27.65N 80.39W
12/26/2004 46 MPH INDIAN RIVER FL OFFICIAL NWS OBS

WINDS GUSTED TO 40 KTS OUT OF THE WEST SOUTHWEST.

Tampa Observations During the Event

Time	Temp	Dwpt	RH	Press	Vis.	Wind/Gusts	Sky
2:53 AM	64.9 °F	63.0 °F	93%	29.61 in	9.0 miles	South 11.5 mph	Mostly Cloudy
3:04 AM	64.4 °F	60.8 °F	88%	29.60 in	9.0 miles	South 12.7 mph/ 25.3 mph	Mostly Cloudy
3:42 AM	64.4 °F	60.8 °F	88%	29.58 in	9.0 miles	SSW 15.0 mph/ 23.0 mph	Mostly Cloudy
3:53 AM	64.0 °F	60.1 °F	87%	29.59 in	8.0 miles	South 19.6 mph/ 26.5 mph	Mostly Cloudy
4:19 AM	62.6 °F	60.8 °F	94%	29.61 in	5.0 miles	WNW 29.9 mph/ 41.4 mph	Light Rain
4:24 AM	57.2 °F	53.6 °F	88%	29.63 in	7.0 miles	WNW 34.5 mph/ 44.9 mph	Light Rain
4:28 AM	53.6 °F	51.8 °F	94%	29.66 in	10.0 miles	NW 39.1 mph/ 51.8 mph	Light Rain
4:36 AM	50.0 °F	46.4 °F	87%	29.68 in	10.0 miles	NW 41.4 mph/ 51.8 mph	Light Rain
4:53 AM	46.9 °F	44.1 °F	90%	29.73 in	10.0 miles	NW 29.9 mph/ 43.7 mph	Light Rain
5:04 AM	46.4 °F	44.6 °F	93%	29.74 in	10.0 miles	NNW 21.9 mph/ 42.6 mph	Light Rain
5:53 AM	45.0 °F	41.0 °F	86%	29.79 in	10.0 miles	NNW 24.2 mph/ 29.9 mph	Mostly Cloudy
6:53 AM	44.1 °F	39.9 °F	85%	29.89 in	10.0 miles	NW 11.5 mph	Overcast

Gusts were slightly higher at St. Petersburg Airport.

Time	Temp	Dwpt	RH	Press	Vis.	Wind/Gusts	Sky
2:53 AM	64.9 °F	61.0 °F	87%	29.58 in	10.0 miles	South 21.9 mph/ 29.9 mph	Overcast
3:53 AM	64.0 °F	62.1 °F	93%	29.58 in	7.0 miles	SSW 20.7 mph/ 32.2 mph	Light Rain
4:08 AM	57.2 °F	55.4 °F	94%	29.65 in	7.0 miles	WNW 36.8 mph/ 51.8 mph	Light Rain
4:13 AM	53.6 °F	50.0 °F	88%	29.67 in	10.0 miles	WNW 41.4 mph/ 51.8 mph	Light Rain
4:38 AM	48.2 °F	44.6 °F	87%	29.74 in	10.0 miles	NW 34.5 mph/ 55.2 mph	Light Rain
4:53 AM	48.0 °F	44.1 °F	86%	29.76 in	10.0 miles	NW 35.7 mph/ 56.4 mph	Light Rain
5:53 AM	45.0 °F	41.0 °F	86%	29.81 in	10.0 miles	NNW 23.0 mph/ 31.1 mph	Overcast
6:24 AM	44.6 °F	41.0 °F	87%	29.86 in	10.0 miles	NNW 16.1 mph/ 25.3 mph	Overcast
6:53 AM	45.0 °F	41.0 °F	86%	29.90 in	10.0 miles	NW 18.4 mph/ 25.3 mph	Overcast

Conclusion

The Tampa Bay area doesn't usually get such abnormally-strong frontal troughs. The vast majority of arctic cold fronts weaken and the air masses moderate before they get that far south. In this case, the same system that brought record-setting snows to deep south Texas and across the Gulf Coast was indeed strong enough to set up a significant pressure gradient across the Tampa Electric service area.

This same frontal system pushed through the entire state of Florida later that same day, moving quickly out into the Atlantic. Miami reported wind gusts over 30 mph and temperatures in the 40's by dawn on the 27th.

While these strong fronts were not that unusual (this was the fifth strong cold front in December), the wind speeds were. The peak wind of 52 mph from the NW (at Tampa) was some 20 mph stronger than any other recorded for the month.

We think that, given the damage incurred and the widespread nature of the event, it does indeed qualify as an abnormal event.

Sam Smith
Meteorologist
ImpactWeather – Houston
877-792-3220