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

October 10, 2006

HAND DELIVERED

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

Re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor; FPSC Docket No. 060001-EI

Dear Ms. Bayo:

Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa Electric Company's Request for Confidential Classification and Motion for a Temporary Protective Order of certain information contained in portions of its answers to the Florida Public Service Commission Staff's Second Set of Interrogatories (Nos. 4, 5).

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

cc: All parties of record (w/enc.)

DOCUMENT NUMBER-DATE

09384 OCT 10 g

FPSC-COMMISSION CL FRK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power Cost Recovery)	
Clause with Generating Performance Incentive)	DOCKET NO. 060001-EI
Factor.)	FILED: October 10, 2006
)	

REQUEST FOR CONFIDENTIAL CLASSIFICATION AND MOTION FOR A TEMPORARY PROTECTIVE ORDER

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Section 366.093, Florida Statutes, and Rule 25-22.006, Florida Administrative Code, hereby requests confidential classification of certain highlighted information contained in portions of its answers to the Florida Public Service Commission Staff's Second Set of Interrogatories (Nos.4, 5). The confidential information in question appears on Bates stamp page 2 of the company's answer to Interrogatory No. 4 and Bates stamp page 3 of the company's answers to Interrogatory No. 5 (referred to as the "Confidential Information"). This request is also intended to serve as a request for a temporary protective order, within the contemplation of Rule 25-22.006(6)(b), Florida Administrative Code, such that it will protect the Confidential Information from public disclosure while in the possession of the Office of Public Counsel.

1. Interrogatories Nos. 4 and 5 asks of Tampa Electric for information requiring the disclosure of the exact percent of the energy charge added to the sales price of Schedule D wholesale sales. That percentage is a negotiated term the disclosure of which would adversely affect Tampa Electric's competitive interest. The Commission on numerous occasions has recognized that non-public negotiated pricing of wholesale transactions is entitled to confidential protection.

- 2. Attached are two redacted copies of Tampa Electric's answer to Interrogatories Nos. 4 and 5. The Company is submitting a single confidential version of these answers with the confidential information highlighted in yellow.
- 3. Subsection 366.093(1), Florida Statutes, provides that any records "found by the Commission to be proprietary confidential business information shall be kept confidential and shall be exempt from s.119.07(1) [requiring disclosure under the Public Records Act]." The proprietary confidential business information includes, but is not limited to:
 - (d) Information concerning bids or other contractual data, the disclosure of which would impair the efforts of the public utility or its affiliates to contract for goods or services on favorable terms. (Section 366.093(3)(d), Florida Statutes)
 - 4. Proprietary confidential business information also includes:
 - (e) Information relating to competitive interests, the disclosure of which would impair the competitive business of the provider of the information. (Section 366.093(3)(e), Florida Statutes)
- 5. The Confidential Information falls within the above statutory categories and, thus, constitutes proprietary confidential business information entitled to protection under Section 366.093 and Rule 25-22.006.
- 6. The material for which confidential classification is sought is intended to be and is treated by Tampa Electric as private and has not been disclosed.

WHEREFORE, Tampa Electric respectfully requests that the highlighted Confidential Information set forth in its Answers to Staff's Interrogatories (Nos. 4, 5) be accorded confidential classification for the reasons set forth above and that a temporary protective order be issued to protect the confidentiality of the information.

DATED this ________ day of October 2006.

Respectfully submitted,

LEE Z. WILLIS

JAMES D. BEASLEY

Ausley & McMullen

Post Office Box 391

Tallahassee, Florida 32302

(850) 224-9115

ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Request for Confidential Classification and Motion for Temporary Protective Order, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (*) on this // day of October 2006 to the following:

Ms. Lisa Bennett*
Staff Attorney
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Mr. John T. Burnett Associate General Counsel Progress Energy Service Co., LLC Post Office Box 14042 St. Petersburg, FL 33733-4042

Mr. Paul Lewis, Jr. 106 East College Avenue Suite 800 Tallahassee, FL 32301-7740

Mr. Timothy J. Perry McWhirter, Reeves & Davidson, P.A. 117 S. Gadsden Street Tallahassee, FL 32301

Mr. John W. McWhirter, Jr. McWhirter, Reeves & Davidson, P.A. 400 North Tampa Street, Suite 2450 Tampa, FL 33601-5126

Ms. Patricia A. Christensen Associate Public Counsel Office of Public Counsel 111 West Madison Street – Room 812 Tallahassee, FL 32399-1400 Mr. Norman Horton Messer Caparello & Self, P.A. Post Office Box 15579 Tallahassee, FL 32317

Ms. Cheryl Martin Florida Public Utilities Company P. O. Box 3395 West Palm Beach, FL 33402-3395

Mr. John T. Butler Senior Attorney Florida Power & Light Company LAW/JB P. O. Box 14000 Juno Beach, FL 33408-0420

Mr. William Walker, III Florida Power & Light Company 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1859

Mr. R. Wade Litchfield Associate General Counsel Florida Power & Light Company 700 Universe Blvd. Juno Beach, FL 33408-0420

Ms. Susan Ritenour Secretary and Treasurer Gulf Power Company One Energy Place Pensacola, FL 32520-0780 Mr. Jeffrey A. Stone Mr. Russell A. Badders Beggs & Lane Post Office Box 12950 Pensacola, FL 32591-2950

Mr. Robert Scheffel Wright Mr. John T. LaVia, III Young van Assenderp, P.A. 225 South Adams Street, Suite 200 Tallahassee, FL 32301

Karen S. White, Lt Col, USAF Damund E. Williams, Capt., USAF AFLSA/JACL-ULT 139 Barnes Drive, Suite 1 Tyndall Air Force Base, FL 32403-5319

Mr. Michael B. Twomey Post Office Box 5256 Tallahassee, FL 32314-5256 Mr. Charles J. Christ, Jr.
Attorney General
Mr. Jack Shreve
Senior General Counsel
Ms. Cecilia Bradley
Senior Assistant Attorney General
Office of the Attorney General
The Capitol – PL01
Tallahassee, FL 32399-1050

Mr. James W. Brew Brickfield, Burchette, Ritts & Stone, P.C. 1025 Thomas Jefferson Street, NW Eighth Floor, West Tower Washington, D.C. 20007-5201

Ms. Karin S. Torain PCS Administration (USA), Inc. Skokie Boulevard, Suite 400 Northbrook, IL 60062

Handson L

BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased Power)	DOCKET NO. 060001-EI
Cost Recovery Clause with)	FILED: October 10, 2006
Generating Performance Incentive)	
Factor	')	

TAMPA ELECTRIC COMPANY'S ANSWERS TO SECOND SET OF INTERROGATORIES (NOS. 3-15)

OF

FLORIDA PUBLIC SERVICE COMMISSION STAFF

Tampa Electric files this its Answers to Interrogatories (Nos. 3 - 15) propounded and served on September 5, 2006, by the Florida Public Service Commission Staff.

TAMPA ELECTRIC COMPANY DOCKET NO. 060001-EI INDEX TO STAFF'S SECOND SET OF INTERROGATORIES (NOS. 3-15)

Number	Witness	<u>Subject</u>	Bates Stamped Page
3	Wehle	How does TECO verify that fuel escalation charges for rail and barge transportation are being properly calculated?	1
4	Aldazabal	On Florida Public Service Commission Schedule A-6 for Schedule D sales, describe each type of cost included in the amount shown in Column 7 (Total \$ for Fuel Adj).	2
5	Aldazabal	For the wholesale sales listed for Schedule D sales on the Florida Public Service Commission A-6 Schedule, how is the total sales price for each sale determined?	3
6	Aldazabal	For MA sales on the Florida Public Service Commission Schedule A-6, how is the Gain From Off-System Sales in column 9, calculated?	4
7	Aldazabal	For MA sales on the Florida Public Service Commission Schedule A-6, what costs for each sale are not included in columns 7 or 9, and how are these costs credited back to the general body of ratepayers, as directed by Order No. PSC 13694, issued September 20, 1984 in Docket No. 840001 which was amended by Order PSC-00-1744-PAA-El issued May 19, 1998 in Docket No. 980269-PU.	5
8	Aldazabal	In TECO's response to the Fuel Adjustment Clause Audit, Audit Control No. 06-046-2-1 filed May 11, 2006, page 2, TECO agreed that the jurisdictional D sales include both fuel costs and incremental O&M cost associated with market based sales, but that TECO did not credit operating revenues for the incremental O&M associated with those sales. Was the incremental O&M cost of \$42,050 for 2005 included in the "Total For Fuel Adjustment" in column (7) of the Florida Public Service Commission A-6 form?	6
9	Wehle	When responding to this question, refer to Order PSC-04-0999-FOF-EI in Docket 031033-EI. What are TECO's plans and timeline for implementing the order and the findings of the Hill and Associates study on coal transportation options prior to the next RFT for coal transportation?	7
10	Aldazabal	When responding to this question, refer to the testimony of Carlos Aldazabal for Fuel and Purchased Power Final 2005 True-up in Docket 060001-EI. When did TECO become aware that the projected fuel prices used in the reprojected fuel expenses filed in October 2005 and proposed for inclusion in the 2006 fuel factor were significantly lower than those actually experienced in 2005?	8

11	Aldazabal	When it became clear that fuel expenses and the expense for purchased power were significantly more than had been projected in the September 2005 fuel filing, why did TECO not reproject fuel expenses for 2005 to include the additional fuel expense in the 2006 fuel factor?	9
12	Aldazabal	When responding to this question, refer to Order No. PSC 13694 and Order No. PSC-98-0691-FOF-PU. Why did TECO not advise the Commission that TECO had an under-recovery of over 10% in either 2005 or 2006 after the escalation of fuel prices caused by hurricanes Katrina and Rita?	10
13	Aldazabal	Provide an analysis of the factors that caused the under- recovery of \$106,516,837 for the year 2005 with an approximate breakout of the contributing factors.	14
14	Aldazabal	When calculating the percent fuel cost under-recovery according to Order No. PSC 13694 and Order No. PSC 98-0691-FOF-PU for 2006, should the fuel expense under-recovery from 2005 be included with the current year fuel expense in consideration of the current percent under-recovery?	15
15	Aldazabal	When calculating the percent fuel cost under-recovery according to Order No. PSC 13694 and Order No. PSC 98-0691-FOF-PU for any specific period, how is the denominator in the percent calculation determined?	16

Joann Wehle Director, Wholesale Marketing & Sales Tampa Electric Company 702 N. Franklin Street Tampa, Florida 33602

Carlos Aldazabal Manager, Regulatory Affairs Tampa Electric Company 702 N. Franklin Street Tampa, Florida 33602 TAMPA ELECTRIC COMPANY DOCKET NO. 060001-EI STAFF'S SECOND SET OF INTERROGATORIES INTERROGATORY NO. 3 PAGE 1 OF 1

FILED: OCTOBER 10, 2006

3. How does TECO verify that fuel escalation charges for rail and barge transportation are being properly calculated?

A. Tampa Electric independently gathers escalation factors and published indexes that drive fuel and transportation related charges. The company then independently calculates the total rate and charges for each vendor invoice. Tampa Electric verifies that the invoice submitted by a vendor matches the charges calculated by the company and only pays the amount calculated by Tampa Electric. This methodology applies to barge and rail transportation with the distinction that rail escalation factors are typically derived by the railroad company and posted on their website.

TAMPA ELECTRIC COMPANY DOCKET NO. 060001-EI STAFF'S SECOND SET OF INTERROGATORIES INTERROGATORY NO. 4 PAGE 1 OF 1 FILED: OCTOBER 10, 2006

- 4. On Florida Public Service Commission Schedule A-6 for Schedule D sales, describe each type of cost included in the amount shown in Column 7 (Total \$ for Fuel Adj).
- A. For Tampa Electric's jurisdictional schedule D sale, the total cost for fuel adjustment is the system incremental cost of fuel adjusted for losses, plus a percent energy charge.

The total cost for fuel adjustment of a separated schedule D sale is Tampa Electric's system average fuel cost for the month.

TAMPA ELECTRIC COMPANY DOCKET NO. 060001-EI STAFF'S SECOND SET OF INTERROGATORIES INTERROGATORY NO. 5 PAGE 1 OF 1

FILED: OCTOBER 10, 2006

- 5. For the wholesale sales listed for Schedule D sales on the Florida Public Service Commission A-6 Schedule, how is the total sales price for each sale determined?
- A. Tampa Electric's 2006 monthly fuel Schedule A-6 shows two jurisdictional D sales and one separated D sale.

The total sales price for each jurisdictional D sale is calculated by taking Tampa Electric's hourly system incremental fuel expense adjusted for losses plus a percent energy charge.

The total sales price for the separated schedule D sale is calculated by taking Tampa Electric's monthly system average fuel charge plus a non-fuel charge applicable to each megawatt-hour delivered to the delivery point during a calendar month.

TAMPA ELECTRIC COMPANY DOCKET NO. 060001-EI STAFF'S SECOND SET OF INTERROGATORIES INTERROGATORY NO. 6 PAGE 1 OF 1 FILED: OCTOBER 10, 2006

- **6.** For MA sales on the Florida Public Service Commission Schedule A-6, how is the Gain From Off-System Sales in column 9, calculated?
- A. Tampa Electric computes the gains for MA sales as the difference between the total sales price in column (8) and the total for fuel adjustment in column (7) less the incremental O&M costs associated with making the sale.

TAMPA ELECTRIC COMPANY
DOCKET NO. 060001-EI
STAFF'S SECOND SET OF INTERROGATORIES
INTERROGATORY NO. 7
PAGE 1 OF 1

FILED: OCTOBER 10, 2006

- 7. For MA sales on the Florida Public Service Commission Schedule A-6, what costs for each sale are not included in columns 7 or 9, and how are these costs credited back to the general body of ratepayers, as directed by Order No. PSC 13694, issued September 20, 1984 in Docket No. 840001 which was amended by Order PSC-00-1744-PAA-El issued May 19, 1998 in Docket No. 980269-PU.
- A. As previously described in the company's response to interrogatory number 6, Tampa Electric computes the gain in column (9) of schedule A-6 as the difference between the total sales price on column (8) and the total for fuel adjustment on column (7) less the incremental O&M costs associated with making the sale. Therefore, the only costs associated with MA sales not included are the incremental O&M costs associated with making the sale. Those costs are credited against operating revenues in accordance with Order No. PSC-00-1744-PAA-EI, issued May 19, 1998 in Docket No. 980269-PU and amended in Order PSC-01-2371-FOF-EI, issued December 7, 2001, in Docket No. 010283-EI. As stated in Item 3, Part III of Order No. PSC-00-1744-PAA-EI and re-affirmed in Section C of Order No. PSC-01-2371-FOF-EI, the appropriate regulatory treatment for non-separated wholesale energy sales is as follows:

"Each [investor-owned electric utility] shall credit its operating and maintenance revenues for an amount equal to the incremental operating and maintenance (O&M) cost of generating the energy for each such sale."

TAMPA ELECTRIC COMPANY DOCKET NO. 060001-EI STAFF'S SECOND SET OF INTERROGATORIES INTERROGATORY NO. 8 PAGE 1 OF 1

FILED: OCTOBER 10, 2006

- 8. In TECO's response to the Fuel Adjustment Clause Audit, Audit Control No. 06-046-2-1 filed May 11, 2006, page 2, TECO agreed that the jurisdictional D sales include both fuel costs and incremental O&M cost associated with market based sales, but that TECO did not credit operating revenues for the incremental O&M associated with those sales. Was the incremental O&M cost of \$42,050 for 2005 included in the "Total For Fuel Adjustment" in column (7) of the Florida Public Service Commission A-6 form?
- A. As stated in Tampa Electric's response to the Fuel Adjustment Clause Audit, the incremental O&M costs associated with making the non-separated jurisdictional D sales were included in column (7) of Schedule A-6. By including the incremental O&M costs in column (7), Tampa Electric inadvertently reduced total fuel and net power expense passed on to ratepayers since the costs of fuel for energy sales is a reduction to total fuel and net power transactions. In January 2006, Tampa Electric began crediting the incremental O&M costs associated with making the non-separated jurisdictional D sales in accordance with Order Nos. PSC-00-1744-PAA-El and PSC-01-2371-FOF-El.

TAMPA ELECTRIC COMPANY
DOCKET NO. 060001-EI
STAFF'S SECOND SET OF INTERROGATORIES
INTERROGATORY NO. 9
PAGE 1 OF 1
FILED: OCTOBER 10, 2006

9. When responding to this question, refer to Order PSC-04-0999-FOF-EI in Docket 031033-EI. What are TECO's plans and timeline for implementing the order and the findings of the Hill and Associates study on coal transportation options prior to the next RFT for coal transportation?

A. Tampa Electric is developing plans to meet its long-term coal supply needs and transportation logistics. To develop the plan, Tampa Electric must understand the potential impact of numerous issues that are shaping the coal and electric utility industries. For example, the Clean Air Interstate Rule ("CAIR") is causing an estimated 70 GW of existing coal fired plants to add scrubbers and/or selective catalytic reduction units. This will allow many power plants to burn lower priced, higher sulfur coals such as the coal from the Illinois Basin that Tampa Electric has historically used. Additionally, the extreme price volatility of natural gas over the past five years has instigated a wave of proposed coal plants.

Recognizing this shift in coal supply and demand dynamics, Tampa Electric's fuel procurement strategy is to have a plan that provides optionality, flexibility, and reliability. Tampa Electric's objective is to have multiple coal suppliers from a variety of regions with multiple modes of delivery. To achieve this flexibility, optionality, and reliability Tampa Electric has proactively visited various coal suppliers, transporters (waterborne and rail), and terminals to help identify viable alternatives. The Company expects to apply this knowledge to an effective Request for Proposals ("RFP").

Tampa Electric has begun developing its strategy and process for coal procurement and transportation after the current coal transportation contract expires. This process is consistent with Order PSC-04-0999-FOF-El and will attempt to capture the key recommendation of the Hill and Associates study to have multiple options for coal transportation to Tampa Electric's power plants. Through viable and cost-effective alternatives, Tampa Electric is working to increase the flexibility of its coal supply and transportation. This flexibility will position Tampa Electric to respond more quickly and effectively to the changing coal market dynamics.

TAMPA ELECTRIC COMPANY DOCKET NO. 060001-EI STAFF'S SECOND SET OF INTERROGATORIES INTERROGATORY NO. 10 PAGE 1 OF 1

FILED: OCTOBER 10, 2006

- 10. When responding to this question, refer to the testimony of Carlos Aldazabal for Fuel and Purchased Power Final 2005 True-up in Docket 060001-EI. When did TECO become aware that the projected fuel prices used in the reprojected fuel expenses filed in October 2005 and proposed for inclusion in the 2006 fuel factor were significantly lower than those actually experienced in 2005?
- A. Tampa Electric became aware that its re-projected fuel expenses for September through December 2005 were lower than those actually experienced after its October 14, 2005 filing. The dramatic increase in fuel prices was predominantly caused by the damage associated with Hurricane Katrina. However, as noted in the October 14, 2005 testimony of Carlos Aldazabal due to the recency of Hurricane Katrina to the filing date, damage assessments caused by Hurricane Katrina were still being performed; therefore only some of the projected winter impacts to natural gas prices were included in the projection filing.

TAMPA ELECTRIC COMPANY DOCKET NO. 060001-EI STAFF'S SECOND SET OF INTERROGATORIES INTERROGATORY NO. 11 PAGE 1 OF 1

FILED: OCTOBER 10, 2006

- 11. When it became clear that fuel expenses and the expense for purchased power were significantly more than had been projected in the September 2005 fuel filing, why did TECO not reproject fuel expenses for 2005 to include the additional fuel expense in the 2006 fuel factor?
- A. Tampa Electric filed a revised re-projection on October 14, 2005 when it became clear that its estimated fuel costs for July and August were less than actual fuel costs. However, Tampa Electric was not aware that fuel expenses and purchased power costs for September through December were higher than had been re-projected until after the October 14, 2005 revised re-projection filing. As previously stated, damage assessments caused by Hurricane Katrina were still being performed at the time of the company's October 14, 2005 filing. Once damage assessments to natural gas production facilities in the Gulf were better known, the fuel hearing had already occurred. Therefore, in light of the timing of events, the company did not reproject fuel expenses for 2005 to include the additional fuel expense in the 2006 fuel factor, which had already been approved.

TAMPA ELECTRIC COMPANY DOCKET NO. 060001-EI STAFF'S SECOND SET OF INTERROGATORIES INTERROGATORY NO. 12 PAGE 1 OF 4 FILED: OCTOBER 10, 2006

- 12. When responding to this question, refer to Order No. PSC 13694 and Order No. PSC-98-0691-FOF-PU. Why did TECO not advise the Commission that TECO had an under-recovery of over 10% in either 2005 or 2006 after the escalation of fuel prices caused by hurricanes Katrina and Rita?
- A. Tampa Electric notified the Commission on July 22, 2005 that its projected actual/estimated fuel and purchased power cost under-recovery for 2005 would be greater than the ten percent notification threshold set forth in Order No. 13694.

A copy of the letter notifying the Commission is attached.

TAMPA ELECTRIC COMPANY
DOCKET NO. 060001-EI
STAFF'S SECOND SET OF INTERROGATORIES
INTERROGATORY NO. 12
PAGE 2 OF 4
FILED: OCTOBER 10, 2006

USLEY & MCMULLEN ORIGINAL

ATTORNEYS AND COUNSELORS AT LAW

227 BOUTH CALHOUN STREET P.O. BOX 391 (ZIP 32302) TALLAHASSEC, FLORIDA 3230; 1850) 224-8115 FAX (850) 222-7580 IAECEWET-TFSC

15 JUL 22 PM 4: 16

COMMISSION CLERK

July 22, 2005

HAND DELIVERED

Mr. Todd Bohrmann Division of Economic Regulation Florida Public Service Commission 2540 Shumard Oak Boulevard Tallehassee, FL 32399-0850 Ms. Adrienne Vining
Staff Counsel
Division of Legal Services
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re:

FPSC Docket No. 050001-EI - Fuel and Purchased Power Cost Recovery Clause and Generation Performance Incentive Factor

Dear Mr. Bohrmann and Ms. Vining:

Commission Order No. 13694, issued in Docket No. 840001-EI on September 20, 1984 states:

When a utility becomes aware that its projected fuel revenues ... will result in an over- or under-recovery in excess of 10% of its projected fuel costs for the period, the utility shall so advise the Commission through a filing promptly made.

CMP	Commission through a filing promptly made
СОМ	Tampa Electric has now determined that its projected actual/estimated fuel and purchased
CTR	power cost under-recovery for the current 2005 cost recovery period will be greater than the ten
ECR	percent notification threshold set forth in Order No. 13694. Tampa Electric's current 2005—projected actual/estimated under-recovery is \$99,909,938. This includes \$5.1 million of the
GCL	
OPC	Order No. 13694 further states:
RCA	
SCR	In light of certain timing considerations a utility may choose, in lieu of requesting a hearing, to inform the Commission, the Staff
SGA	and the intervenors that a greater than ten percent over- or under-
SEC	recovery is projected to occur.
отн	

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FPSC-COMMISSION CLERK

TAMPA ELECTRIC COMPANY
DOCKET NO. 060001-EI
STAFF'S SECOND SET OF INTERROGATORIES
INTERROGATORY NO. 12
PAGE 3 OF 4
FILED: OCTOBER 10, 2006

Mr. Todd Bohrmann Ms. Adrienne Vining July 22, 2005 Page 3

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing letter, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail on this 2.2 day of July 2005, to the following:

Ms. Adrienne Vining
Ms. Jennifer Rodan
Office of General Counsel
Florida Public Service Commission
2540 Shummard Oak Boulevard
Tallahassee, FL 32399-0850

Mr. James A McGee Associate General Counsel Progress Energy Florida, Inc. Post Office Box 14042 St. Petersburg, FL 33733

Mr. Gary V. Perko Hopping Green & Sams, P.A. Post Office Box 6526 Tallabassee, FL 32314

Mr. Timothy J. Perry
McWhirter, Reeves, McGlothlin
Davidson, Kaufman & Arnold, P.A.
117 S. Gadsden Street
Tallahassee, FL 32301

Mr. John W. McWhirter McWhirter, Reeves, McGlothlin Davidson, Kaufman & Arnold, P.A. 400 North Tampa Street, Suite 2450 Tampa, FL 33601-5126

Ms. Patricia A. Christensen Associate Public Counsel Office of Public Counsel 111 West Madison Street, Suite 812 Tallahassee, FL 32399-1400 Mr. John T. Butler Steel Hector & Davis LLP 200 South Biscayne Boulevard Suite 4000 Miami, FL 33131-2398

Mr. William G Walker, III Florida Power & Light Company 215 South Monroe Street, Suite 810 Tallahassee, FL 32301-1859

Ms. Susan Ritenour Gulf Power Company One Energy Place Pensacola, FL 32520

Mr. Jeffrey A. Stone Mr. Russell A. Badders Beggs & Lane Post Office Box 12950 Pensacola, FL 32576

Mr. Norman Horton Messer Caparello & Self Post Office Box 1876 Tallahassee, FL 32301

Ms. Cheryl Martin Florida Public Utilities Company Post Office Box 3395 West Palm Beach, FL 33402-3395

ATTORNEY

TAMPA ELECTRIC COMPANY DOCKET NO. 060001-EI STAFF'S SECOND SET OF INTERROGATORIES INTERROGATORY NO. 12 PAGE 4 OF 4 FILED: OCTOBER 10, 2006

Mr. Todd Bohrmann Ms. Adrienne Vining July 22, 2005

Page 2

In view of the timing of this determination, Tampa Electric is not requesting a mid-course correction but, instead, will seek recovery of the projected 2005 under-recovery as a component of the company's 2006 fuel factors.

Sincerely,

James D. Beasley

JDB/pp

cc:

Blanca S. Bayo, Director

Division of Records and Reporting

All Parties of Record

TAMPA ELECTRIC COMPANY DOCKET NO. 060001-EI STAFF'S SECOND SET OF INTERROGATORIES INTERROGATORY NO. 13 PAGE 1 OF 1

FILED: OCTOBER 10, 2006

- 13. Provide an analysis of the factors that caused the under-recovery of \$106,516,837 for the year 2005 with an approximate breakout of the contributing factors.
- A. The chart below provides a breakout of the contributing factors behind the 2005 \$106,516,837 under-recovery.

Tampa Electric's 2005 Under-Recovery (\$000)

	Sept.	Oct.	Nov.	Dec.	Total
Variance Jurisdictional Revenues	2,016	(55)	(1,045)	(2,719)	(1,803)
Variance					
Fuel Cost	15,162	22,986	20,155	30,085	88,388
Purchased Power	18,801	13,126	(4,606)	(6,636)	20,684
Variance System Fuel & Purch. Power	33,963	36,111	15,548	23,449	109,072
Variance Jurisdictional Fuel & Purch. Power ⁽¹⁾	31,866	33,781	14,423	22,981	103,051
Variance Interest/Other	314	(316)	13	254	266
Total Under Recovery	\$(30,209)	\$(63,957)	\$(79,899)	\$(106,517)	

⁽¹⁾ Adjusted for jurisdictional separation and line losses.

TAMPA ELECTRIC COMPANY DOCKET NO. 060001-EI STAFF'S SECOND SET OF INTERROGATORIES INTERROGATORY NO. 14 PAGE 1 OF 1

FILED: OCTOBER 10, 2006

14. When calculating the percent fuel cost under-recovery according to Order No. PSC 13694 and Order No. PSC-98-0691-FOF-PU for 2006, should the fuel expense under-recovery from 2005 be included with the current year fuel expense in consideration of the current percent under-recovery?

A. No, Tampa Electric's 2005 fuel under-recovery should not be included with the 2006 fuel expense in consideration of the current period percent under-recovery. According to Order No. PSC 13694 and Order No. PSC-98-0691-FOF-PU, the ten percent threshold only applies to the jurisdictional fuel expense for the current period. However, in the event Tampa Electric were to request a mid-course correction, any existing under-recovery would be included in the mid-course correction filling.

TAMPA ELECTRIC COMPANY DOCKET NO. 060001-EI STAFF'S SECOND SET OF INTERROGATORIES INTERROGATORY NO. 15 PAGE 1 OF 1

FILED: OCTOBER 10, 2006

- 15. When calculating the percent fuel cost under-recovery according to Order No. PSC 13694 and Order No. PSC-98-0691-FOF-PU for any specific period, how is the denominator in the percent calculation determined?
- A. The under-recovery percentage is calculated by taking the actual fuel and purchased power costs in the current period plus the projected fuel and purchased power costs remaining in the period and then dividing that amount by the projected fuel and purchased power costs in the projection filing.

AFFIDAVIT

STATE OF FLORIDA		
COUNTY OF HILLSBOROUGH	:	

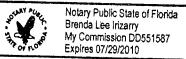
Before me the undersigned authority personally appeared Paula K. Brown who deposed and said that she is Associate Regulatory Analyst, Tampa Electric Company, and that the individuals listed in Tampa Electric Company's response to Staff's Second Set of Interrogatories, (Nos. 3-15) prepared or assisted with the responses to these interrogatories to the best of her information and belief.

Dated at Tampa, Florida this ______day of October, 2006.

Paula Brown

Sworn to and subscribed before me this 4th day of October, 2006.

Budah. ely



My Commission expires _____