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September 14, 2007

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COMMISSION CLERK

Ms. Ann Cole, Director
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket No. 070297-EI; Review of 2007 Electric Infrastructure Storm Hardening Plan filed pursuant to Rule 25-6.0342, Florida Administrative Code submitted by Tampa Electric Company

Dear Ms. Cole:

Enclosed for filing in the above docket, on behalf of Tampa Electric Company, are the original and fifteen (15) copies of each of the following:

- 1. Tampa Electric Company's Prehearing Statement 8416-01
2. Rebuttal Testimony and Exhibit (RBH-2) of Regan B. Haines 8417-07

Also enclosed is a CD containing the above-referenced Prehearing Statement generated on a Windows 98 operating system and using Word 2000 as the word processing software.

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,

[Handwritten signature of Lee L. Willis]

Lee L. Willis

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of 2007 Electric Infrastructure)
Storm Hardening Plan submitted pursuant to) DOCKET NO. 070297-EI
Rule 25-6.0342, F.A.C., submitted by Tampa)
Electric Company) FILED: September 14, 2007
_____)

**TAMPA ELECTRIC COMPANY'S
PREHEARING STATEMENT**

Pursuant to Order No. PSC-07-0573-PCO-EI, issued July 10, 2007, Tampa Electric Company ("Tampa Electric" or the "company") files this its Prehearing Statement.

1. All Known Witnesses

Regan B. Haines – Direct Testimony

Regan B. Haines – Rebuttal Testimony

2. All Known Exhibits

Exhibit of Regan B. Haines (RBH-1)

Exhibit of Regan B. Haines (RBH-2)

3. Tampa Electric's Statement of Basic Position

Tampa Electric's Storm Hardening Plan ("Plan") provides a reasonable, measured approach to storm hardening and is incremental to the previously approved Pole Inspection Program and Ten Point Plan which are other parts of the multi-pronged approach by the Commission to improve system reliability on resiliency during and after extreme weather conditions.

Tampa Electric's Plan contemplates continuing to build to National Electric Safety Code ("NESC") Grade B construction for all new major planned expansions, rebuild or relocation of

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distribution facilities as it has done since the 1970s. Grade B construction, which has an effective wind speed of 116 mph, fits with the storm profiles that have been experienced in Tampa Electric's service area over the last 150 years.

In addition, Tampa Electric's Plan includes: (1) two targeted pilot projects to upgrade its Grade B construction to extreme wind on the circuits serving critical facilities in the city of Tampa; (2) one project to upgrade the transmission circuit feeding Tampa International Airport to current extreme wind standards; and (3) upgrades to specific targeted areas in its service area.

Tampa Electric's Plan complies with Rule 25-6.0342, F.A.C. by providing a reasonable and measured approach to storm hardening.

4. Tampa Electric's Position on the Issues

ISSUE 1: Does the Company's Plan reasonably address the extent to which, at a minimum, the Plan complies with the National Electric Safety code (ANSI C-2) [NESC] that is applicable pursuant to subsection 25-6.0345(2), F.A.C. [Rule 25-6.0342(3)(a)]

TECO POSITION:

Yes. Tampa Electric has historically designed its distribution facilities based on Grade B construction. Grade C construction is typically the minimum standard for most electrical distribution systems. Since Grade B construction is significantly stronger than Grade C construction and Tampa Electric proposes to continue to build to construction Grade B, Tampa Electric's distribution facilities comply, and in most cases exceed the minimum requirements of the NESC.

ISSUE 2: Does the Company's Plan reasonably address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the

NESC are adopted for new distribution facility construction? [Rule 25-6.0342(3)(b)I]

TECO POSITION:

Yes. Tampa Electric's Plan to continue building to NESC construction Grade B for all new distribution facilities is reasonable. The Plan is reasonable because the maximum sustained winds experienced over the last 150 years in Tampa Electric's service area is 115 mph and construction Grade B is designed to effectively withstand 116 mph winds.

ISSUE 3: Does the Company's Plan reasonably address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for major planned work on the distribution system, including expansion, rebuild, or relocation of existing facilities, assigned on or after the effective date of this rule distribution facility construction? [Rule 25-6.0342(3)(b)2]

TECO POSITION:

Yes. Tampa Electric's Plan to continue building to construction Grade B for all major planned expansion rebuild or relocation of distribution facilities is reasonable.

ISSUE 4: Does the Company's Plan reasonably address the extent to which the extreme wind loading standards specified by Figure 250-2(d) of the 2007 edition of the NESC are adopted for distribution facilities serving critical infrastructure facilities and along major thoroughfares taking into account political and

geographical boundaries and other applicable operational considerations?

[Rule 256-6.0342(3)(b)3]

TECO POSITION:

Yes. Tampa Electric's Plan to continue to build to NESC construction Grade B for all critical infrastructure and major thoroughfares is reasonable. Tampa Electric plans to undertake specific pilot projects built to extreme wind as identified in its Plan. These pilot projects will be monitored and analyzed to determine cost-effectiveness prior to consideration of wide-spread application. Tampa Electric's Plan is a reasonable measured approach to the hardening of its system.

ISSUE 5: Does the Company's Plan reasonably address the extent to which its distribution facilities are designed to mitigate damage to underground and supporting overhead transmission and distribution facilities due to flooding and storm surges? [Rule 25-6.0342(3)(c)]

TECO POSITION:

Yes. Tampa Electric's proposed standard for all new and maintenance replacement of underground distribution facilities (padmounted transformers, switchgear, load break cabinets and padmounted capacitors) located in Flood Zone 1 designated area is to be built using stainless steel or aluminum construction with submersible connectors and bolted to the concrete pad. This Plan is reasonable.

ISSUE 6: Does the Company's Plan reasonably address the extent to which the placement of new and replacement distribution facilities facilitate safe and

efficient access for installation and maintenance pursuant to Rule 25-6.0341, F.A.C.? [Rule 25-6.0342(3)(d)]

TECO POSITION:

Yes. Tampa Electric's policy to place all new distribution facilities in public right-of-way ("ROW") which is typically in front of the customer's premises and not to build in rear lot easements is reasonable. The company will also continue to evaluate community or customer requests to relocate overhead facilities from rear lot locations to the front of customer's properties on a case-by-case basis for feasibility, practicality, and cost-effectiveness.

ISSUE 7: Does the Company's Plan provide a detailed description of its deployment strategy including a description of the facilities affected; including technical design specifications, construction standards, and construction methodologies employed? [Rule 25-6.0342(4)(a)]

TECO POSITION:

Yes. Tampa Electric's Plan contains a detailed three-year deployment strategy which includes a description of the facilities affected, technical design specifications, construction standards and methodologies.

ISSUE 9: Does the Company's Plan provide a detailed description to the communities and areas within the utility's service area where the electric infrastructure improvements, including facilities identified by the utility as critical infrastructure and along major thoroughfares pursuant to subparagraph (3)(b)3, are to be made? [Rule 25-6.0342(4)(b)]

TECO POSITION:

Yes. All of the pilot projects and specific upgrades identified in Tampa Electric's Plan are within the city of Tampa.

ISSUE 9: Does the Company's Plan provide a detailed description of the extent to which the electric infrastructure improvements involve joint use facilities on which third-party attachments exist? [Rule 25-6.0342(4)(c)]

TECO POSITION:

Yes. In addition, Tampa Electric has met with third-party attachers, accompanied attachers to the physical location and rode the routes of the pilot projects with all interested third-party attachers. Consequently, the attachers have been provided sufficient details of the proposed pilot projects. They know the routes involved, the number of poles affected and Tampa Electric's projected costs for all of the projects in Tampa Electric's Plan. Finally, in an attempt to even further delineate Tampa Electric's Plan relative to impacts on third-party attachers, the company joins all parties in agreeing to the procedure outlined in the Process to Engage Third-Party Attachers document (referred to as the "process within a process" at the various workshops).

ISSUE 10: Does the Company's Plan provide a reasonable estimate of the costs and benefits to the utility of making the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages? [Rule 25-6.0342(4)(d)]

TECO POSITION:

Yes. Tampa Electric's Plan cost estimates, developed utilizing current work methods, products and equipment are: 2007 - \$1.022 million; 2008 - \$1.01

million; and 2009 \$1.078 million. Detail plans for all three years have been provided. The pilot projects and upgrades Tampa Electric proposes may provide societal benefits in excess of costs if these projects decrease the chance of outages in storm conditions or reduce restoration times after a storm. While the precise calculation of benefits depends on the actual occurrence of a storm and an evaluation of how the hardened facilities performed during and after storm conditions, the primary benefit of these projects is that they will provide valuable information on the feasibility of upgrading other facilities should they demonstrate superior performance.

While the precise calculation of benefits depends on the actual occurrence of a storm and an evaluation of how the hardened facilities performed during and after storm conditions, it is assumed that if a named storm hits the Tampa Bay area, the critical facilities identified here are more likely to remain in service longer and be restored quicker if the proposed hardening activities are completed. A calculation of these benefits is shown on Exhibit ____ RBH-1, Document 2.

ISSUE 11: Does the Company's Plan provide a reasonable estimate of the costs and benefits, obtained pursuant to subsection (6) below, to third-party attachers affected by the electric infrastructure improvements, including the effect on reducing storm restoration costs and customer outages realized by the third-party attachers? [Rule 25-6.0342(4)(e)]

TECO POSITION:

With the information provided in Tampa Electric's Plan, the additional information provided in Tampa Electric's Cost Benefit Analysis [Document 2 of

Exhibit ____ (RBH-1)], Tampa Electric's third-party attachers should be able to estimate their costs resulting from the implementation of the pilot projects identified in Tampa Electric's Plan. While it is difficult to calculate the exact benefits to the third-party attachers, the implementation of the pilot projects will provide data that will enable third-party attachers to provide better estimates of their benefits. Consequently, it is reasonable for Tampa Electric to proceed with the pilot projects identified in its Plan.

ISSUE 12: Does the Company's Plan include reasonable written Attachment Standards and Procedures addressing safety, reliability, pole loading capacity, and engineering standards and procedures for attachments by others to the utility's electric transmission and distribution poles that meet or exceed the edition of the National Electrical Safety Code (ANSIC-2) that is applicable pursuant to Rule 25-6.034, F.A.C.? [Rule 25-6.0342(5)]

TECO POSITION:

Yes. Tampa Electric's Plan includes Attachment Standards and Procedures as called for by Rule 25-6.0342. Specifically Tampa Electric seeks approval in this docket of Sections 8.1, 8.2, 8.2.2, 8.4.1, 8.5, 8.7, and 8.8 of Tampa Electric's Plan. These standards and procedures are reasonable.

ISSUE 13: Based on the resolution of the preceding issues, should the Commission find that the Company's Plan meets the desired objectives of enhancing reliability and reducing restoration costs and outage times in a prudent, practical, and cost-effective manner to the affected parties. [Rule 25-6.0342(1) and (2)]

TECO POSITION:

Yes. Tampa Electric's Storm Hardening Plan should result in less storm damage to the electrical infrastructure and, therefore, less restoration time and cost. More generally, Tampa Electric's Plan together with, pole inspections, and increased vegetation management activities, can be reasonably expected to reduce future storm restoration costs compared to what they would be without those initiatives. Tampa Electric's continuing to build to construction Grade B while undertaking specific pilot projects to be constructed to NESC extreme wind provides a reasonable measured approach to storm hardening. Hardening the system, increasing pole inspections, enhancing line clearing activities, hardening underground, along with various pilot projects will all have an impact on reducing storm damage, reducing or preventing outages, and reducing the overall storm restoration times. Additionally, there will be day-to-day reliability benefits realized. Finally, improved systems and processes, including improved storm forensics, will allow for more and better data to be collected, evaluated and analyzed. It will take many years of sustained effort to achieve the full benefits of storm hardening.

By utilizing its pilot project approach (targeting specific critical infrastructure for EWL), Tampa Electric is hardening its system efficiently and economically. As a result Tampa Electric's Plan is prudent, practical and is being implemented in a cost-effective manner.

5. Stipulations

Tampa Electric requests that the stipulation to the Process to Engage Third-Party Attachers as filed with the testimony of AT&T Florida witness Kirk Smith and agreed to

by all parties as modified by staff be approved by the Commission. This process resolves the coordination and level of detail issues discussed among the parties at the workshops.

6. Pending Motions

There are no pending motions.

7. Pending Confidentiality Claims or Requests

None.

8. Objections to Witness Qualifications

None.

9. Compliance with Order No. PSC-07-0573-PCO-EI

Tampa Electric has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 14th day of September, 2007.

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By: _____

Lee L. Willis

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Prehearing Statement, filed on behalf of Tampa Electric Company, has been served on this 14th day of September, 2007 by hand delivery(*) or U. S. Mail on each of the following:

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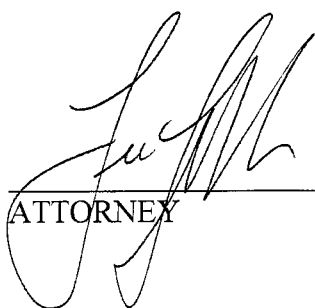
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