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

September 2, 2008

HAND DELIVERED

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

Re: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor; FPSC Docket No. 080001-EI

Dear Ms. Cole:

Enclosed for filing in the above docket are the original and fifteen (15) redacted copies of Tampa Electric's Company's Fuel Procurement and Wholesale Power Purchases Risk Management Plan 2009. A single confidential version of the Plan with the confidential information highlighted in yellow is being separately filed this date with your office along with a Request for Confidential Classification.

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

COM ___
ECR ___
GCL 1
OPC ___
RCP 2
SSC JDB/pp
SGA Enclosure
ADM ___
CLK cc: All Parties of Record (w/enc.)

TAMPA ELECTRIC COMPANY
FUEL PROCUREMENT AND WHOLESALE POWER PURCHASES
RISK MANAGEMENT PLAN
2009

Introduction

Tampa Electric serves its retail customers' electricity needs through a portfolio of generation and wholesale purchases. Tampa Electric's generation fuel mix is a balanced blend of coal and natural gas. While fuel mix diversity enhances long-term reliability, the reliance on natural gas can potentially increase variation in fuel prices. The company's risk management activities reduce the impact of price uncertainty and volatility to the Fuel and Purchased Power Cost Recovery Clause.

I. Qualitative and Quantitative Risk Management Objectives

A. Qualitative objectives: Tampa Electric's goals in managing risks associated with fuel or power purchases are focused on minimizing supply risk to ensure reliability of electric service to its customers at a reasonable price. To the extent that price risk can be reduced without compromising supply reliability or imposing unnecessary costs on its customers, Tampa Electric is committed to executing strategies to accomplish its risk management goals.

B. Quantitative objectives: Tampa Electric's quantitative objective is to prudently manage its fuel and wholesale energy procurement activities to minimize the variance from projected expenditures while taking advantage of cost-saving opportunities that do not result in increased supply risk. Tampa Electric has established a portfolio of fuel and purchased power products with creditworthy counterparties for known volumes and prices.

II. Oversight & Reporting of Fuel Procurement Activities

The company provides its fuel and wholesale energy procurement activities with independent and unavoidable oversight.

A. The TECO Energy Board of Directors established an Energy Risk Management Policy ("Risk Policy"). This policy governs all energy commodities transacting activity at each of TECO Energy's operating units. The scope of the policy includes:
- Roles and responsibilities of various persons and functions with respect to risk management
- Authorized transacting activity

- Risk limits
- Valuation and data management
- Credit risk management
- Reporting
- Compliance and enforcement

B. The Risk Policy established the Risk Advisory Committee ("RAC"). The responsibilities of the RAC include the following:

- Reviewing the Risk Management Policy periodically and recommending changes and enhancements for approval by the Board of Directors ("Board")
- Reviewing corporate risk limits for recommendation to the Board
- Within Board approved corporate risk limits, establishing the quantitative limits for operating companies. The RAC may, at its discretion, delegate approval of sub-limits to operating company management
- Approving parameters for counterparty credit limits and the allocation of limits among the operating companies
- Establishing guidelines for risk management and measurement
- Overseeing and reviewing the risk management process and infrastructure
- Reviewing and approving transacting strategies proposed by the operating companies
- Understanding and approving methodologies used for valuation and risk measurement
- Reviewing and approving corporate and operating company risk limits
- Establishing credit underwriting standards, and monitoring credit risk-taking activities and related exposures
- Reviewing risk reports, including portfolio risk summaries and profitability and performance summaries
- Enacting, maintaining, and enforcing limit violation and trader misconduct policies
- Taking appropriate courses of action when the risk position of a transacting group has exceeded or is approaching the established limits
- Reviewing and approving new risk management products
- Presenting periodic reports to the Board or its committees

C. TECO Energy established a corporate risk management function ("middle office"), which is overseen by the Director of Independent Risk Oversight.

D. Tampa Electric established additional oversight or control mechanisms to ensure compliance with policies and procedures. The following practices provide checks and balances on procurement activities.

- Fuel and wholesale energy procurement activities are conducted in accordance with company guidelines, including review by the operating stations, Environmental Health and Safety Department and other management.
- All agreements are formalized in a written contract that is reviewed by the company's Legal Department.
- The contracts are reviewed by the Corporate Credit Manager of TECO Energy's Energy Risk Management Department for potential credit risks and incorporation of appropriate credit protection.
- The company maintains approval authority restrictions based on term and value of the transaction.
- Payments of invoices under each contract are settled by an independent department, approved by the Manager(s) and/or Director of the Wholesale Marketing and Fuels Department, and reviewed by the Regulatory Accounting Department.
- Each transaction is eligible for review by outside, internal and regulatory auditors.
- Implementation of an information system that provides transaction authority control, credit monitoring, mark-to-market and value-at-risk analysis and other key controls.

E. In accordance with the Risk Policy, Tampa Electric established commodity transaction limits for related commodity transactions.

- The Risk Authorizing Committee reviews and approves commodity transaction limits on an individual basis.
- The limits include commodity, physical or financial, tenor (time limit), and dollar amount.
- Only a few individuals, all manager level or above, are authorized to execute financial hedging transactions.

F. Tampa Electric's Fuels Management Department has updated and formalized its policies and procedures. The key elements of its policies and procedures are:

- Financial hedging of fuel commodities are for mitigation of risk to fuel price uncertainty and volatility.
- Hedging will be conducted in a manner consistent with the Risk Management Plan approved by the Risk Authorizing Committee.
- Execution of hedges under the Risk Management Plan will be consistent with approved transaction limits for authorized transactors.

- Duties will be separated to assure sufficient control over hedging transactions.
- Hedging activity will be monitored regularly and reported at least once a month to insure consistency with the Risk Management Plan.

G. Reports are generated that summarize the fuel procurement activities of the company. These include monthly financial reports produced by Regulatory Accounting, FERC Electric Quarterly Reports, FERC Form 1, FERC Form 580, FERC Form 423, FPSC A schedules and FPSC E schedules. In addition, position and mark-to-market reports are produced and reviewed by the Director of Independent Risk Oversight. The appropriate entries and related disclosures are made in the company's books and records as required by accounting standards.

III. Risk Assessment

In its Risk Policy, TECO Energy has identified the following types of risks for its commodity portfolio:

A. Market Risk

Market risk is the potential change in value of a commodity contract caused by adverse changes in market factors (price and volatility). The following are types of market risk.

Price Risk: Price risk refers to the uncertainty associated with changes in the price of an underlying asset. For instance, if a company has a short position in the market (*e.g.*, needs to meet load requirements by purchasing electricity or natural gas), it will be susceptible to price increases. Conversely, if a company is in a long position (*e.g.*, excess generation or natural gas supply), it is exposed to decreases in market prices. Tampa Electric manages its price risk using physical and financial hedges.

In 2009, Tampa Electric is subject to limited price risk related to variation in coal prices. That price risk is mitigated in part because the company has already contracted for most of its expected coal needs at known prices. Expected market conditions do not currently require further price risk mitigation, for the reasons described in Section IV of this plan.

Tampa Electric evaluated its exposure to changes in the price for natural gas in 2009 based on the forward price and estimated uncertainty in the price of natural gas and the company's expected usage under both low

and high price natural gas cases. As expected, natural gas expenditures decrease in the low case by an estimated [redacted] and total fuel and purchased power costs decrease by [redacted] due to lower prices. In the high case, natural gas expenditures increase by an estimated [redacted]; and the total fuel and purchased power costs increase by [redacted]. This exposure estimate does not take into account any hedges the company may implement to limit its exposure. Tampa Electric's hedging strategy with respect to natural gas is outlined in Section IV of this plan.

Tampa Electric's expected expenditures for purchased power have an open position of approximately [redacted] for 2009. Tampa Electric's hedging strategy with respect to purchased power is outlined in Section IV of this plan.

Tampa Electric requires small quantities of fuel oil and maintains a contract that eliminates its supply risk. Due to the small quantities of fuel oil needed for generation, the cost impact caused by price risk is minimal and is therefore not quantified.

Time Spread Risk: This is the risk that the relationship between two points (*i.e.*, one month versus six months) on the forward curve changes. Because the shape of the fuel or electricity forward curve changes to reflect the market's expectations of spot and future fuel or electricity prices, the relationship between any two points on the curve is not always constant. Because of the nature of its business Tampa Electric has little reason or opportunity to offset energy commodity requirements in one month with resources delivered in another month. Therefore, time spread risk is not a significant issue for Tampa Electric.

Liquidity Risk: Liquidity risk is associated with the lack of marketability of a commodity. It includes the risk of an adverse cost or return variation stemming from the lack of marketability of a financial instrument. Liquidity risk may arise because a given position is very large relative to typical trading volumes of like commodity and contract tenor, or because market conditions are unsettled. Liquidity risk is usually reflected in a wide bid-ask spread and large price movements in response to any attempt to buy or sell. A firm facing the need to quickly unwind a portfolio of illiquid instruments may find it necessary to sell at prices far below fair value. Tampa Electric is not exposed to liquidity risk for natural gas financial instruments since the company does not purchase instruments for resale. Tampa Electric does have some liquidity risk for wholesale power transactions since the Florida market has a limited number of participants.

Basis Risk: Basis risk is the risk exposure due to a difference in commodity value between different delivery points. Electricity markets are regional. Prices can be different at different locations because of differences in both supply costs and the cost of transmission between the two locations. These price differences are dynamic, primarily due to changes in transmission availability between the two locations. Due to the stability of the coal market, Tampa Electric's negligible use of oil, and the indexing of its natural gas contract pricing, basis risk is not a significant issue for the company.

Fundamentally, market risk is created by the existence of "open" positions. An open position is the difference between an existing requirement and the ability to meet that requirement with existing resources.

B. Volume Risk

Volume risk is the potential adverse economic impact of unanticipated changes in supply or demand. Tampa Electric faces supply risk, because there is uncertainty associated with the availability of generating units or fuel availability for those units. If a generating unit fails, Tampa Electric must replace the power with another unit's generation or with purchased power at market prices. Tampa Electric also faces demand risk since there is uncertainty associated with customer demand, and thus uncertainty in the determination of the fuel or energy purchase volumes necessary to supply such demand. Tampa Electric's volume risk for fuel and purchased power in 2009 is managed operationally and through contract terms enforcement, including appropriate legal remedies, should a party default.

C. Credit Risk

Credit risk is the risk of financial loss due to a counterparty's failure to fulfill the terms of a contract on a timely basis. It includes both settlement risk associated with payment for fuel or energy received, as well as potential risk, which reflects the risk that the counterparty defaults on an obligation to provide or receive fuel or energy. Credit risk depends on the probability of counterparty default, the concentration of credit exposure with a small number of counterparties, the total amount of exposure, and the volatility of markets. Tampa Electric's credit risk will vary based on the number of its trading counterparties and the mark-to-market value of its hedge transactions. Tampa Electric's existing credit risk is minimal since it uses a wide variety of counterparties, and has systems and processes in place to monitor and control Credit Risk.

D. Administrative Risk

Administrative risk is risk of loss associated with deficiencies in a company's internal control structure and management reporting due to human error, fraud or a system's inability to adequately capture, store and report transactions. The company has consistently maintained appropriate administrative controls for entering and administration of commodity transactions.

IV. Risk Management Strategy and Current Hedging Activity

Tampa Electric's risk management strategy is designed to limit exposure to different types of risk that are applicable to the company's operation.

Market Risk

Tampa Electric's potential market risk is the result of open positions in four commodities:

- Coal
- Natural Gas
- Fuel Oil
- Purchased Power

System energy requirements during 2009 are projected to be served in the proportions shown in the following table.

Commodity	Percent of System Energy
Coal	50
Natural Gas	37
No. 2 Oil	<1
No. 6 Oil	<1
Purchased Power	13

Based on Tampa Electric's assessment of market risk factors, the company has implemented the market risk management strategies described below.

Coal. Tampa Electric has contracted for most of its expected coal needs for 2009 through bilateral agreements with coal producers. The company provided the projected amounts in both tons and dollars in its 2009 projection filing submitted September 2, 2008. The coal market has experienced significant price increases in 2008, and prices are expected

to remain near 2008 levels in 2009. Low-sulfur coal prices increased to a greater degree than Illinois Basin coal prices, and Tampa Electric's ability to utilize the high-sulfur, Illinois Basin coal in its units has reduced its exposure to price volatility. While the Illinois Basin has recently experienced production difficulties due to labor and geologic issues, it is a region where coal production may increase relatively quickly to respond to increased needs. As a result, Tampa Electric's coal volume risk in 2009 is diminished. Tampa Electric's contracts with suppliers incorporate legal remedies in the event of default, which address volume risk.

Fuel Oil. In 2009, Tampa Electric will continue to purchase its fuel oil needs at indexed market prices. Oil represents less than one percent of the company's needs on a GWH basis, and therefore, associated price risk is minimal. Tampa Electric maintains a contract with a local supplier to deliver all of its needs, which mitigates supply risk.

Natural Gas. Tampa Electric continues to implement prudent financial hedging strategies for natural gas requirements. In 2008, the company used swap agreements—the exchange of a payment tied to the value of a natural gas index for a fixed payment—to hedge natural gas. In keeping with the company's approved risk management plan, Tampa Electric plans to hedge a significant percentage of its projected natural gas usage in 2009.

Tampa Electric uses the forward pricing information of the New York Mercantile Exchange ("NYMEX") natural gas forward price curve in developing natural gas price hedging strategy. Tampa Electric also subscribes to energy consulting services that provide information about underlying issues affecting the availability and price of natural gas and other commodities. The purpose of Tampa Electric's natural gas hedge plan is to reduce natural gas price volatility by utilizing financial instruments relying on three key variables: price, volume and time.

Tampa Electric projects prices during the company's annual fuel budgeting process. The volume of natural gas that the company will hedge falls between a minimum and a maximum percentage of the expected natural gas burn. The percentages vary according to the time remaining until the contract month.

Tampa Electric's approved Risk Management Plan describes the following key elements of the company's natural gas hedging strategy: (1) natural gas prices can be hedged up to 24 months into the future; (2) nearer months can be hedged for a greater percentage of the expected volume than outer months; and (3) natural gas options can be used for financial hedging.

Currently, Tampa Electric estimates over [redacted] percent of its total 2008 natural gas purchases will be covered by financial hedges. The net effect of these hedges is estimated to be a [redacted] of approximately [redacted]. For 2009, Tampa Electric has approximately [redacted] percent hedged with a currently estimated [redacted] of [redacted].

Purchased Power. Total forecasted purchased power for 2009 is 2,753 GWH. As of August 2008, Tampa Electric has physically hedged [redacted] percent of its 2009 expected purchased power needs through pre-scheduled purchased power agreements. The remaining [redacted] GWH or [redacted] percent of 2009 forecasted wholesale energy purchases will be purchased from as-available cogenerators or on the short-term, non-firm market for economy purposes, which are not hedged. The table below shows the expected spot purchased power amounts by month.

EXPECTED PURCHASES
2009

	Total Purchases (MWh)	Open Position Purchases (MWh)	Open Position (% of Total)	Projected Transaction Price ($/MWh)	Open Position ($)
JAN	295,137	[redacted]			
FEB	204,485				
MAR	227,613				
APR	223,681				
MAY	255,206				
JUN	220,491				
JUL	254,457				
AUG	267,898				
SEP	214,918				
OCT	208,539				
NOV	169,645				
DEC	210,923				
TOTAL	2,752,992				

The company's purchased power contracts include a fuel component; therefore, Tampa Electric has exposure to fuel price risk for its wholesale energy purchases, particularly for purchased power supplied from natural gas-fired generation. Tampa Electric does not currently hedge wholesale energy transactions with financial instruments due to the lack of a liquid, published wholesale energy market and appropriate available instruments.

Tampa Electric is responsible for fuel delivery on new purchased power contracts that began in 2008 and 2009. Tampa Electric is not currently including these contract volumes in its hedging portfolio. Once Tampa Electric has more experience with these contracts, the company will reassess whether this natural gas volume should be added to its natural gas hedge portfolio.

In summary, Tampa Electric's planned operations in 2009 result in nominal market risk associated with coal and fuel oil. Non-price risks associated with natural gas and purchased power are also minimal. Therefore, while the company continues to evaluate risk for all fuel and energy commodity transactions, it is currently focused on mitigating the price risk associated with natural gas and purchased power.

Volume Risk

Hedging of volumetric risk is problematic due to a limited number of viable financial hedging instruments. Tampa Electric has identified the following hedges.

- Maintaining appropriate inventory stockpiles provides a physical hedge against volume risk.
- "Swing" contracts enable the buyer to take variable volumes up to a predefined limit.
- Full requirement contracts enable the buyer to take any volume up to total usage.

Tampa Electric uses inventory swing contracts and full requirements contracts where needed commodity volumes are small and in situations where commodity volumes are unpredictable in volume and/or timing. Other alternatives will continue to be identified, assessed and implemented as necessary.

Credit Risk

TECO Energy's credit risk management process is composed of the following primary steps.

- Gather counterparty information for initial evaluation
- Assess counterparty creditworthiness and assign credit limit
- Determine credit collateral requirements, as needed
- Request, review and monitor contractual requirements, legal covenants, collateral documents and credit provisions
- Quantify counterparty exposure and measure against approved limits
- Monitor counterparty and credit support provider qualities
- Prepare credit exposure reports on a daily basis that are reviewed prior to entering into transactions

Administrative Risk

Tampa Electric maintains energy trading risk management systems and processes to efficiently track, monitor and evaluate hedging activities. Tampa Electric's administrative processes and system controls have passed repeated internal and external (Sarbanes-Oxley) audits.