

**Marguerite McLean**

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**From:** Jim Beasley [jbeasley@ausley.com]  
**Sent:** Friday, April 16, 2010 9:00 AM  
**To:** Filings@psc.state.fl.us  
**Cc:** Russell Badders; John Butler; Charles Beck; John Burnett; Kathryn Cowdery  
**Subject:** Dkt. 100084 - TECO Comments

**Attachments:** Dkt. 100084 - Comments.pdf



DKT.  
mmeD

**Electronic filing**

**a. Person responsible for this electronic filing:**

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**b. Docket No. 100084-EI**

**In re: Initiation of rulemaking to adopt Rule 25-6.0424, F.A.C., Petition for Mid-Course Correction**

**c. The document is being filed on behalf of Tampa Electric Company**

**d. There is a total of 8 pages, including cover letter**

**e. The document attached for electronic filing is Tampa Electric Company's Comments on Mid-Course Schedules**

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DOCUMENT NUMBER - DATE

02924 APR 16 09

FPSC-COMMISSION CLERK



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April 16, 2009

## ELECTRONIC FILING

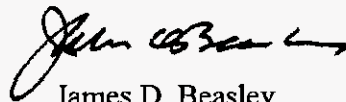
Ms. Ann Cole, Director  
Division of Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 100084-EI, Initiation of Rulemaking to Adopt Rule 25-6.0424, FAC,  
Petition for Mid-Course Correction

Dear Ms. Cole:

On behalf of Tampa Electric Company, I enclose for filing Tampa Electric Company's Comments on Mid-Course Schedules and hand revised copies of Schedules E1-D, E1-A, E1-E, E2, E6 and E9 taken from the Staff Recommendation in this docket dated March 25, 2010. These pages are from Form PSC/ECR009-E, which is to be incorporated by reference into proposed Rule 25-6.0424.

Sincerely,



James D. Beasley

JDB/pp  
Enclosures

cc: Kathryn Cowdery, Office of General Counsel (w/encls.)  
Charlie Beck, Office of Public Counsel (w/encls.)  
John Burnett, Progress Energy Florida (w/encls.)  
John T. Butler, Florida Power & Light Company (w/encls.)  
Russell Badders, Counsel for Gulf Power Company (w/encls.)

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**TAMPA ELECTRIC COMPANY'S  
COMMENTS ON MID-COURSE SCHEDULES**

Set forth below are Tampa Electric's comments on proposed schedules in connection with Rule 25-6.0424, Florida Administrative Code, petition for mid-course correction, followed by hand revised copies of proposed Schedules E1-D, E1-A, E1-E, E2, E6 and E9.

1. Schedule E1: We would propose that we include the actual true-up balance at the time of the midcourse filing on line 28 "True-up".
2. Schedule E1-A: On line 1 of E1-A we propose we show the actual true-up balance for the last actual month from our A-schedules. The over/(under)recovery on line 3 (which would equal line 1) would then go over to line 28 "True-up" on Schedule E1. Revamp this schedule to remove lines 2 & 3.
3. Schedule E1-B: New schedule. No comments.
4. Schedule E1-B-1: New schedule. No comments.
5. Schedule E1-C: No comments.
6. Schedules E1-D: The Fuel Cost is not a "%" - it is a ratio, the 100% needs to be deleted. Line 1-3 should be "Jurisdictional" since there is no yearly (they are monthly) jurisdictional fuel factor that can be applied as stated on line 5. (Delete line 5). Also, Line 10 should be "GPIF Factor".
7. Schedule E1-E: Tampa Electric does not use Groups delete Column (1). Also we do not use a fuel recovery loss multiplier delete column (4). Column (5) should read "Levelized" fuel recovery factor. Need two more columns for "First Tier up to 1,000 KWh" and "Second Tier Over 1,000 Kwh".
8. Schedule E2: Need a line "4a Adjustments to fuel costs". Also line 6 should read "Jurisdictional" not "System".
9. Schedule E3-E5: No comments.
10. Schedule E6: The 80% in Column 10 needs to be deleted since it is only used once the threshold is crossed.
11. Schedule E9: Need to add 2 columns between columns 4 and 5 that show "MWH for Interruptible" and "MWH for Firm".
12. Schedule E10: No comments.
13. Capacity Schedules E12a-E: New schedules, no comments.

DOCUMENT NUMBER-DATE

02924 APR 16 0

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DETERMINATION OF FUEL RECOVERY FACTOR  
 TIME OF USE RATE SCHEDULES  
 COMPANY \_\_\_\_\_  
 FOR THE PERIOD \_\_\_\_\_

SCHEDULE E1-D

	NET ENERGY FOR LOAD (%)	Ratio FUEL COST (%)
ON PEAK	100.00	<del>100.00</del>
OFF PEAK	100.00	<del>100.00</del>
TOTAL	ON PEAK	OFF PEAK

1	(Jurisd) Total Fuel & Net Power Trans	
2	(Jurisd) MWH Sales	
3	(Jurisd) Cost Per KWH Sold	
4	Jurisdictional Loss Factor	
5	<del>Jurisdictional Fuel Factor</del>	
6	True-Up	
7	TOTAL	
8	Revenue Tax Factor	
9	Recovery Factor	
10	GPIF Factor	
11	Recovery Factor Including GPIF	
12	Recovery Factor Rounded to the Nearest .001 4/KWH	
13	Hours: ON PEAK	%
14	OFF PEAK	%

*Needs to be*

1 (Jurisd) Total Fuel & Net Power Trans  
 2 (Jurisd) MWH Sales  
 3 (Jurisd) Cost Per KWH Sold  
 4 Jurisdictional Loss Factor  
 5 ~~Jurisdictional Fuel Factor~~  
 6 True-Up

*There is no  
yearly Jurisdictional fuel factor.*

CALCULATION OF TOTAL TRUE-UP  
(PROJECTED PERIOD)

COMPANY \_\_\_\_\_  
FOR THE PERIOD \_\_\_\_\_

SCHEDULE E1-A

	True-up Balance Based on last actual month.	
1	<del>Estimated Over/(Under) Recovery (6 Months Actual, 6 Months Estimated Period) (Schedule E1-B)</del>	<del>\$ _____</del>
2	Final True-Up (12 Month Actual Period)	_____
3	Total Over/(Under) Recovery (Lines 1 + 2) To be Included in 12 Month Projected Period (Schedule E1, Line 29)	\$ _____
4	Jurisdictional kWh Sales (Projected Period)	_____
5	True-Up Factor (Lines 3/4) * 100 (4/KWH)	\$ _____

~~also~~  
delete

FUEL RECOVERY FACTORS - BY RATE GROUP  
 (ADJUSTED FOR LINE/TRANSFORMATION LOSSES)  
 COMPANY \_\_\_\_\_  
 FOR THE PERIOD \_\_\_\_\_

(1) GROUP	(2) RATE SCHEDULE	(3) AVERAGE FACTOR	(4) FUEL RECOVERY LOSS MULTIPLIER	SCHEDULE E1-E (5) LEVELIZED FUEL RECOVERY FACTOR
A			Delete	First Tier up to 1,000 KWh  Second Tier over 1,000 KWh
B				
C				
D				
A		ON-PEAK OFF-PEAK		
B		ON-PEAK OFF-PEAK		
C		ON-PEAK OFF-PEAK		
D		ON-PEAK OFF-PEAK		

← Delete

FUEL AND PURCHASED POWER COST RECOVERY CLAUSE CALCULATION

COMPANY \_\_\_\_\_

FOR THE PERIOD \_\_\_\_\_

SCHEDULE E2

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	TOTAL PERIOD
	ESTIMATED												
	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEPT	OCT	NOV	DEC	
1 Fuel Cost of System Generation													1
1a Nuclear Fuel Disposal													1a
2 Fuel Cost of Power Sold													2
3 Fuel Cost of Purchased Power													3
3a Demand and Non-Fuel Cost of Purchased Power													3a
3b Qualifying Facilities													3b
4 Energy Cost of Economy Purchases													4
5 TOTAL FUEL AND NET PWR TRANS (Sum of Lines A-1 Through A-4)													5
6 System KWH Sold (MWH)													6
6a Jurisdictional % of Total Sales													6a
7 Cost Per KWH Sold (¢/KWH)													7
7a Jurisdictional Loss Multiplier													7a
7b Jurisdictional Cost (¢/KWH)													7b
8 True-Up (¢/KWH)													8
9 TOTAL													9
10 Revenue Tax Factor													10
11 Recovery Factor Adjusted for Taxes													11
12 GPIF (¢/KWH)													12
13 Recovery Factor Rounded to Nearest .001 ¢/KWH													13

4a. Adjustments to fuel costs

Jurisdictional



POWER SOLD  
 COMPANY \_\_\_\_\_  
 ESTIMATED FOR THE PERIOD \_\_\_\_\_

*Delete*

SCHEDULE E6

(1) MONTH	(2) SOLD TO	(3) TYPE & SCHEDULE	(4) TOTAL MWH SOLD	(5) MWH WHEELED FROM OTHER SYSTEMS	(6) MWH FROM OWN GENERATION	(7) \$/KWH		(8) TOTAL \$ FOR FUEL ADJUSTMENT (6)*(7)(A)	(9) TOTAL COST \$ (6)*(7)(B)	(10) 80% GAIN ON ECONOMY SALES
						(A) FUEL COST	(B) TOTAL COST			
1										
2										
3										
4										
5										
6										
7										
8										
9										
10										
11										
12										
TOTAL*										

Rev. 4/2010      \*TOTAL \$ INCLUDES 80% OF GAIN ON ECONOMY ENERGY SALES

ECONOMY ENERGY PURCHASES  
 COMPANY \_\_\_\_\_  
 ESTIMATED FOR THE PERIOD OF \_\_\_\_\_

SCHEDULE E9

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	
	MONTH	PURCHASED FROM	TYPE & SCHEDULE	TOTAL MWH PURCHASED	TRANSACTION COST 4/KWH	TOTAL \$ FOR FUEL ADJUSTMENTS (4)*(5)	COST IF GENERATED		FUEL SAVINGS (7)(B) - (6)
							(A) 4/KWH	(B) (\$000'S)	
1									
2				(5)	(6)				
3				MWH FOR INTERRUPTIBLE	MWH FOR FIRM				
4									
5									
6									
7									
8									
9									
10									
11									
12									
	TOTAL*								