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October 10, 2011

HAND DELIVERED

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COMMISSION
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Ms. Ann Cole, Director
Division 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. 110001-EI

Dear Ms. Cole:

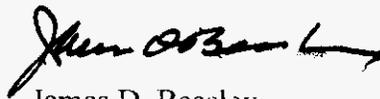
Enclosed for filing in the above docket are the original and fifteen (15) copies of Tampa
Electric Company's Prehearing Statement.

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,



James D. Beasley

JDB/pp
Enclosures

- COM _____
- APA 2 _____
- ECR 10 ^{cc} +CD _____
- GCL 2 _____
- RAD 1 _____
- SRC _____
- ADM _____
- OPC _____
- CLK _____

All parties of record (w/enc.)

DOCUMENT NUMBER-DATE

07378 OCT 10 =

FPSC-COMMISSION CLERK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and Purchased)
Power Cost Recovery Clause)
and Generating Performance)
Incentive Factor.)
_____)

DOCKET NO. 110001-EI
FILED: October 10, 2011

**TAMPA ELECTRIC COMPANY'S
PREHEARING STATEMENT**

A. APPEARANCES:

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J. JEFFRY WAHLEN
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Tallahassee, Florida 32302
On behalf of Tampa Electric Company

B. WITNESSES:

<u>Witness</u>	<u>Subject Matter</u>	<u>Issues</u>
(Direct)		
1. Carlos Aldazabal (TECO)	Generic Fuel Adjustment Issues Adjustment Factors	6, 7, 8, 9, 10, 11,
	Fuel Factor Calculation Issues	18, 19, 20, 21, 22
	Company-Specific Capacity Cost Recovery Factor Issues	26A
	Generic Capacity Cost Recovery Factor Issues	27, 28, 29, 30, 31, 32, 33
	Effective Date	34
2. Brian S. Buckley (TECO)	Generic Generating Performance Incentive Factor Issues	16, 17
	Company-Specific Generating Performance Incentive Factor Issue	15A

DOCUMENT NUMBER-DATE

07378 OCT 10 =

FPSC-COMMISSION CLERK

	Fuel Factor Calculation Issues	18
3. Benjamin F. Smith (TECO)	Company-Specific Fuel Adjustment Issues	5A, 5B
	Fuel Factor Calculation Issues	18
	Generic Capacity Cost Recovery Factor Issues	31
4. Brent C. Caldwell (TECO)	Company-Specific Fuel Adjustment Issues	5A, 5B
	Fuel Factor Calculation Issues	18

C. EXHIBITS:

<u>Exhibit</u>	<u>Witness</u>	<u>Description</u>
<u> </u> (CA-1)	Aldazabal	Fuel Cost Recovery January 2010 - December 2010
<u> </u> (CA-1)	Aldazabal	Capacity Cost Recovery January 2010 – December 2010
<u> </u> (CA-2)	Aldazabal	Actual/Estimated True-Up Fuel Cost Recovery January 2011 – December 2011
<u> </u> (CA-2)	Aldazabal	Actual/Estimated True-Up Capacity Cost Recovery January 2012 – December 2012
<u> </u> (CA-3)	Aldazabal	Projected Fuel Cost Recovery January 2012 – December 2012
<u> </u> (CA-3)	Aldazabal	Projected Capacity Cost Recovery January 2012 – December 2012
<u> </u> (CA-3)	Aldazabal	Levelized and Tiered Fuel Rate January 2012 – December 2012
<u> </u> (BSB-1)	Buckley	Generating Performance Incentive Factor True-Up January 2010 – December 2010
<u> </u> (BSB-2)	Buckley	Generating Performance Incentive Factor January 2011 – December 2011 (Revised)

<u> </u> (BSB-3)	Buckley	Generating Performance Incentive Factor January 2012 – December 2012
<u> </u> (JBC-1)	Caldwell	2010 Fuel Procurement Risk Management Report
<u> </u> (JBC-2)	Caldwell	Fuel Procurement and Wholesale Power Purchase Risk Management Plan 2012
<u> </u> (JBC-3)	Caldwell	Hedging Activities for Natural Gas for Seven Month Period January through July 2011

D. STATEMENT OF BASIC POSITION

Tampa Electric Company's Statement of Basic Position:

The Commission should approve Tampa Electric's calculation of its fuel adjustment, capacity cost recovery and GPIF true-up and projection calculations, including the proposed fuel adjustment factor of 4.183 cents per kWh before any application of time of use multipliers for on-peak or off-peak usage; the company's proposed capacity factor for the period January through December 2012; a GPIF reward of \$2,054,696 for performance during 2010; approval of the company's proposed GPIF targets and ranges for 2012; and approval of the company's proposed re-establishment of its GPIF targets and ranges for 2011 based on the corrected revised testimony and exhibit filed on April 11, 2011 in this docket. Tampa Electric also requests approval of its calculated wholesale incentive benchmark of \$2,482,588 for calendar year 2012.

E. STATEMENT OF ISSUES AND POSITIONS

I. FUEL ISSUES

COMPANY-SPECIFIC FUEL ADJUSTMENT ISSUES

Tampa Electric Company

ISSUE 5A: Should the Commission approve as prudent, TECO's actions to mitigate the volatility of natural gas, residual oil and purchased power prices, as reported in TECO's April 2011 and September 2011 hedging reports?

TECO: Yes. Tampa Electric prudently followed its 2010 and 2011 Risk Management Plans and accordingly utilized financial hedges to mitigate volatility of natural gas prices during the period January 2010 through July 2011. (Witness: Caldwell, Smith)

ISSUE 5B: Should the Commission approve TECO's 2012 Risk Management Plan?

TECO: Yes. Tampa Electric's 2012 Risk Management Plan provides prudent, non-speculative guidelines for mitigating price volatility while ensuring supply reliability. (Witness: Caldwell, Smith)

GENERIC FUEL ADJUSTMENT ISSUES

ISSUE 6: What are the appropriate actual benchmark levels for calendar year 2011 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

TECO: \$2,719,531. (Witness: Aldazabal)

ISSUE 7: What are the appropriate estimated benchmark levels for calendar year 2012 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

TECO: \$2,482,588. (Witness: Aldazabal)

ISSUE 8: What are the appropriate fuel adjustment true-up amounts for the period January 2010 through December 2010?

TECO: \$5,086,991 over-recovery. (Witness: Aldazabal)

ISSUE 9: What are the appropriate fuel adjustment actual/estimated true-up amounts for the period January 2011 through December 2011?

TECO: \$42,726,419 over-recovery. (Witness: Aldazabal)

ISSUE 10: What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2012 to December 2012?

TECO: \$47,813,410 over-recovery. (Witness: Aldazabal)

ISSUE 11: What are the appropriate projected total fuel and purchased power cost recovery amounts for the period January 2012 through December 2012?

TECO: The total fuel and purchased power cost recovery amount for the period January 2012 through December 2012, is \$842,609,327. The total recoverable fuel and purchased power recovery amount to be collected, adjusted by the jurisdictional separation factor excluding GPIF and revenue tax factor but including the true-up amount, is \$793,991,818. (Witness: Aldazabal, Smith)

COMPANY-SPECIFIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES

Tampa Electric Company

ISSUE 15A: Should Tampa Electric's GPIF targets and ranges for 2011 be re-established, based on the corrected revised testimony and exhibit of Tampa Electric's witness Brian Buckley, filed in this docket on April 11, 2011?

TECO: Yes. The corrected revised targets and ranges for 2011 are set forth on page 4 of 40 of Mr. Buckley's Exhibit __ (BSB-2), marked "Revised 4/11/11", a copy of which is attached hereto as Exhibit "A". (Witness: Buckley)

GENERIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES

ISSUE 16: What is the appropriate generation performance incentive factor (GPIF) reward or penalty for performance achieved during the period January 2010 through December 2010 for each investor-owned electric utility subject to the GPIF?

TECO: A reward in the amount of \$2,054,696. (Witness: Buckley)

ISSUE 17: What should the GPIF targets/ranges be for the period January 2012 through December 2012 for each investor-owned electric utility subject to the GPIF?

TECO: The appropriate targets and ranges are shown in Exhibit No. ____ (BSB-3) to the prefiled testimony of Mr. Brian S. Buckley. Targets and ranges should be set according to the prescribed GPIF methodology established in 1981 by Commission Order No. 9558 in Docket No. 800400-CI and later modified in 2006

after meeting with Staff and intervening parties at the request of the Commission.

(Witness: Buckley)

FUEL FACTOR CALCULATION ISSUES

ISSUE 18: What are the appropriate projected net fuel and purchased power cost recovery and Generating Performance Incentive amounts to be included in the recovery factor for the period January 2012 through December 2012?

TECO: The projected net fuel and purchased power cost recovery amount to be included in the recovery factor for the period January 2012 through December 2012, adjusted by the jurisdictional separation factor, is \$841,805,228. The total recoverable fuel and purchased power cost recovery amount to be collected, including the true-up and GPIF and adjusted for the revenue tax factor, is \$796,618,188. (Witness: Aldazabal, Caldwell, Buckley, Smith)

ISSUE 19: What is the appropriate revenue tax factor to be applied in calculating each investor-owned electric utility's levelized fuel factor for the projection period January 2012 through December 2012?

TECO: The appropriate revenue tax factor is 1.00072. (Witness: Aldazabal)

ISSUE 20: What are the appropriate levelized fuel cost recovery factors for the period January 2012 to December 2012?

TECO: The appropriate factor is 4.183 cents per kWh before any application of time of use multipliers for on-peak or off-peak usage. (Witness: Aldazabal)

ISSUE 21: What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class/delivery voltage level class?

TECO: The appropriate fuel recovery line loss multipliers are as follows:

<u>Metering Voltage Schedule</u>	<u>Line Loss Multiplier</u>
Distribution Secondary	1.0000
Distribution Primary	0.9900

Transmission	0.9800
Lighting Service	1.0000

(Witness: Aldazabal)

ISSUE 22: What are the appropriate fuel cost recovery factors for each rate class/delivery voltage level class adjusted for line losses?

TECO: The appropriate factors are as follows:

<u>Metering Voltage Level</u>	<u>Fuel Charge Factor (cents per kWh)</u>	
Secondary	4.190	
Tier I (Up to 1,000 kWh)	3.840	
Tier II (Over 1,000 kWh)	4.840	
Distribution Primary	4.148	
Transmission	4.106	
Lighting Service	4.129	
Distribution Secondary	4.580	(on-peak)
	4.036	(off-peak)
Distribution Primary	4.534	(on-peak)
	3.996	(off-peak)
Transmission	4.488	(on-peak)
	3.955	(off-peak)

(Witness: Aldazabal)

II. CAPACITY ISSUES

COMPANY-SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES

Tampa Electric Company

ISSUE 26A: Should the Commission approve Tampa Electric Company's proposal to charge incremental cybersecurity costs to the capacity cost recovery clause?

TECO: Yes. These are costs to comply with NERC requirements that did not exist and which Tampa Electric could not have anticipated when its last full revenue requirements case took place. (Witness: Aldazabal)

GENERIC CAPACITY COST RECOVERY FACTOR ISSUES

ISSUE 27: What are the appropriate capacity cost recovery true-up amounts for the period January 2010 through December 2010?

TECO: \$461,060 under-recovery. (Witness: Aldazabal)

ISSUE 28: What are the appropriate capacity cost recovery actual/estimated true-up amounts for the period January 2011 through December 2011?

TECO: \$254,524 under-recovery. (Witness: Aldazabal)

ISSUE 29: What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2012 through December 2012?

TECO: \$715,584 under-recovery. (Witness: Aldazabal)

ISSUE 30: What are the appropriate projected total capacity cost recovery amounts for the period January 2012 through December 2012?

TECO: The projected total capacity cost recovery amount for the period January 2012 through December 2012 is \$44,720,668. (Witness: Aldazabal)

ISSUE 31: What are the appropriate projected net purchased power capacity cost recovery amounts to be included in the recovery factor for the period January 2012 through December 2012?

TECO: The purchased power capacity cost recovery amount to be included in the recovery factor for the period January 2012 through December 2012, adjusted by the jurisdictional separation factor, is \$44,533,518. The total recoverable capacity cost recovery amount to be collected, including the true-up amount and adjusted for the revenue tax factor, is \$45,281,681. (Witness: Aldazabal, Smith)

ISSUE 32: What are the appropriate jurisdictional separation factors for capacity revenues and costs to be included in the recovery factor for the period January 2012 through December 2012?

TECO: The appropriate jurisdictional separation factor is 0.9958152. (Witness: Aldazabal)

ISSUE 33: What are the appropriate capacity cost recovery factors for the period January 2012 through December 2012?

TECO: The appropriate factors for January 2012 through December 2012 are as follows:

<u>Rate Class and Metering Voltage</u>	<u>Capacity Cost Recovery Factor (\$/kWh)</u>	<u>(\$/kW)</u>
RS Secondary	0.00278	
GS and TS Secondary	0.00258	
GSD, SBF Standard Secondary		.86
Primary		.85
Transmission		.84
GSD Optional Secondary	0.00205	
Primary	0.00203	
IS, SBI Primary		0.69
Transmission		0.69
LS1 Secondary	0.00065	

(Witness: Aldazabal)

III. EFFECTIVE DATE

ISSUE 34: What should be the effective date of the fuel adjustment charge and capacity cost recovery charge for billing purposes?

TECO: The new factors should be effective beginning with the specified billing cycle and thereafter for the period January 2012 through the last billing cycle for December 2012. The first billing cycle may start before January 1, 2012, and the last billing cycle may end after December 31, 2012, so long as each customer is billed for 12 months regardless of when the fuel factors became effective. (Witness: Aldazabal)

F. STIPULATED ISSUES

TECO: None at this time.

G. MOTIONS

TECO: None at this time.

H. PENDING REQUEST OR CLAIMS FOR CONFIDENTIALITY

TECO: Tampa Electric has pending several requests for confidential treatment of information relating to hedging practices, risk management strategies and fuel and fuel transportation contract matters.

I. OBJECTIONS TO A WITNESS'S QUALIFICATION AS AN EXPERT

TECO: None at this time.

J. OTHER MATTERS

TECO: None at this time.

DATED this 10th day of October 2011.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Prehearing Statement, filed on behalf of Tampa Electric Company, has been furnished by U. S. Mail or hand delivery (*) on this 10th day of October 2011 to the following:

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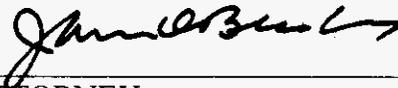
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ATTORNEY

TAMPA ELECTRIC COMPANY
GPIF TARGET AND RANGE SUMMARY
JANUARY 2011 - DECEMBER 2011

EQUIVALENT AVAILABILITY

PLANT / UNIT	WEIGHTING FACTOR (%)	EAF TARGET (%)	EAF RANGE		MAX. FUEL SAVINGS (\$000)	MAX. FUEL LOSS (\$000)
			MAX. (%)	MIN. (%)		
BIG BEND 1	4.79%	67.9	73.5	56.8	1,359.3	(5,657.4)
BIG BEND 2	6.23%	62.4	66.3	54.5	1,765.3	(1,487.8)
BIG BEND 3	6.47%	83.5	85.8	78.9	1,833.9	(1,379.9)
BIG BEND 4	8.25%	77.9	81.3	71.0	2,339.2	(2,354.1)
POLK 1	0.70%	88.6	90.0	85.9	198.3	(455.9)
BAYSIDE 1	1.40%	78.2	79.4	75.9	397.4	(821.4)
BAYSIDE 2	0.33%	94.4	95.0	93.3	93.8	(280.8)
GPIF SYSTEM	28.17%					

AVERAGE NET OPERATING HEAT RATE

PLANT / UNIT	WEIGHTING FACTOR (%)	ANOHR Btu/kwh	TARGET NOF	ANOHR RANGE		MAX. FUEL SAVINGS (\$000)	MAX. FUEL LOSS (\$000)
				MIN.	MAX.		
BIG BEND 1	13.09%	10,649	91.3	10,176	11,123	3,710.3	(3,710.3)
BIG BEND 2	8.71%	10,379	91.2	10,025	10,733	2,469.7	(2,469.7)
BIG BEND 3	10.13%	10,602	86.9	10,265	10,939	2,871.4	(2,871.4)
BIG BEND 4	10.62%	10,599	90.8	10,286	10,911	3,012.5	(3,012.5)
POLK 1	16.31%	9,820	97.5	9,117	10,522	4,624.5	(4,624.5)
BAYSIDE 1	5.15%	7,212	86.6	7,120	7,305	1,459.8	(1,459.8)
BAYSIDE 2	7.82%	7,311	84.7	7,222	7,400	2,218.6	(2,218.6)
GPIF SYSTEM	71.83%						

Exhibit "A"