Eric Fryson

From:	Hayes, Annisha <annishahayes@andrewskurth.com></annishahayes@andrewskurth.com>
Sent:	Tuesday, June 11, 2013 4:43 PM
То:	Filings@psc.state.fl.us
Subject:	Docket No. 130040-EI: WCF HUA's Response to TECO's Request for Clarification of HUA's First Set of Interrogatories Nos 1-131
Attachments:	HUA Response to TECO Clarification.pdf

Electronic Filing

a. Person responsible for this electronic filing:

Kenneth L. Wiseman Andrews Kurth LLP 1350 I Street, NW Suite 1100 Washington, DC 20005 202-662-2715 (phone) 202-662-2739 (fax)

b. Docket No. 130040-EI.

c. Document being filed on behalf of WCF Hospital Utility Alliance (WCF HUA).

d. There are a total of 4 pages.

e. The document attached for electronic filing is WCF HUA's Response to TECO's Request for Clarification of WCF HUA's First Set of Interrogatories (Nos. 1-131). (See attached HUA Response to TECO Clarification.pdf)

Thank you for your attention and cooperation to this request.

Regards. Annisha Hayes AndrewsKurth, LLP 1350 I Street, NW Suite 1100 Washington, DC 20005 202-662-2783 202-662-2739 (fax) <u>ahayes@andrewskurth.com</u> <u>www.andrewskurth.com</u>

The information contained in this e-mail and any attachments to it may be legally privileged and include confidential information intended only for the recipient(s) identified above. If you are not one of those intended recipients, you are hereby notified that any dissemination, distribution or copying of this e-mail or its attachments is strictly prohibited. If you have received this e-mail in error, please notify the sender of that fact by return e-mail and permanently delete the e-mail and any attachments to it immediately. Please do not retain, copy or use this e-mail or its attachments for any purpose or its contents to any other person. Thank you.

FPSC-COMMISSION CLERK

Confidentiality Notice: The information contained in this e-mail and any attachments to it may be legally privileged and include confidential information intended only for the recipient(s) identified above. If you are not one of those intended recipients, you are hereby notified that any dissemination, distribution or copying of this e-mail or its attachments is strictly prohibited. If you have received this e-mail in error, please notify the sender of that fact by return e-mail and permanently delete the e-mail and any attachments to it immediately. Please do not retain, copy or use this e-mail or its attachments for any purpose, nor disclose all or any part of its contents to any other person. Thank you

Treasury Circular 230 Disclosure: Any tax advice in this e-mail (including any attachment) is not intended or written to be used, and cannot be used, by any person, for the purpose of avoiding penalties that may be imposed on the person. If this e-mail is used or referred to in connection with the promoting or marketing of any transaction(s) or matter(s), it should be construed as written to support the promoting or marketing of the transaction(s) or matter(s), and the taxpayer should seek advice based on the taxpayer's particular circumstances from an independent tax advisor.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

§

In re: Petition for rate increase by Tampa Electric Company

Docket No.: 130040-EI

Dated: June 11, 2013

WCF HOSPITAL UTILITY ALLIANCE'S RESPONSE TO TAMPA ELECTRIC COMPANY'S REQUEST FOR CLARIFICATION OF WCF HOSPITAL UTILITY ALLIANCE'S FIRST SET OF INTERROGATORIES TO TAMPA ELECTRIC COMPANY (NOS. 1-131)

The WCF Hospital Utility Alliance ("HUA"), by and through its undersigned representatives, hereby submits the clarifications requested by Tampa Electric Company ("Tampa Electric") on June 11, 2013 regarding the intended timeframes for HUA's Interrogatories Nos. 96 and 98 set forth in the First Set of Interrogatories of HUA to Tampa Electric and, states:

- 1. For Interrogatory No. 96, the intended and correct timeframe is 1992 2012.
- 2. For Interrogatory No. 98, the intended and correct timeframe is 2014 2022.

Accordingly, the corrected Interrogatories read as follows:

- 96. Regarding Cifuentes at 12-3-17. Please state the temperature at the time of winter and summer peaks for each year from 1992 2012.
- 98. Regarding Cifuentes at Doc No. 3. Document No. 3 to your testimony reflects a decline in the real price of electricity per megawatt hour for residential customers each year from 2014 2022. Please explain all reasons that support the projected decline in the real price of electricity per dollar megawatt hour and produce all documents supporting that analysis.

DOCUMENT NUMBER-DATE 03239 JUNII FPSC-COMMISSION CLERK

WAS:197089.1

Respectfully submitted,

/s/ Kenneth L. Wiseman

Kenneth L. Wiseman Mark F. Sundback Lisa M. Purdy William M. Rappolt Blake R. Urban Andrews Kurth LLP 1350 I Street NW Suite 1100 Washington, DC 20005 Phone: (202) 662-2700 Fax: (202) 662-2739 kwiseman@andrewskurth.com msundback@andrewskurth.com lpurdy@andrewskurth.com wrappolt@andrewskurth.com burban@andrewskurth.com

Qualified Representatives for the WCF Hospital Utility Alliance

DATED: June 11, 2013

CERTIFICATE OF SERVICE DOCKET NO. 130040-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served by

electronic mail, U.S. Mail, or Federal Express, this 11th day of June, 2013, to the following:

Tampa Electric Company

Gordon L. Gillette Paula K. Brown P.O. Box 111 Tampa, FL 33601-0111 Phone: (813) 228-1444 Fax: (813) 228-1770 Email: <u>Regdept@tecoenergy.com</u>

Office of Public Counsel

J.R. Kelly P. Christensen J. McGlothlin c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32393-1400 Phone: (850) 488-9330 Email: Christensen.patty@leg.state.fl.us

Florida Public Service Commission

Office of the General Counsel Martha Barrera Martha Brown Suzanne Brownless 2450 Shumard Oak Boulevard Tallahassee, FL 32399

Florida Retail Federation

100 East Jefferson Street Tallahassee, FL 32301 Phone: (850) 222-4082 Fax: (850) 226-4082

Florida Industrial Power Users Group

Jon C. Moyle, Jr. c/o Moyle Law Firm 118 North Gadsden Street Tallahassee, FL 32301 Phone: (850) 681-3828 Fax: (850) 681-8788 Email: jmoyle@kagmlaw.com

Ausley Law Firm

James D. Beasley P.O. Box 391 Tallahassee, FL 32302 Phone: (850) 224-9115 Fax: (850) 222-7560 Email: jbeasley@ausley.com

Charles Misted

AARP, Associate State Director 200 West College Avenue Tallahassee, FL 32301 Phone: (850) 577-5190 Email: <u>CMilsted@aarp.org</u>

Florida Consumer Action Network

Bill Newton 3006 W. Kennedy Blvd Suite B Tampa, FL 33609 Phone: (813) 877-6712 Email: <u>billn@fcan.org</u>

Macquarie Capital (USA) Inc.

Sunny Kwak Andrew Weisel 125 West 55th Street, Level 23 New York, NY 10019 Phone: (212) 231-1683 Email: <u>Sunny.Kwak@macquarie.com</u>

Federal Executive Agencies

Lt. Col. Gregory J. Fike AFLOA/JACL-ULFSC 139 Barnes Drive, Suite 1 Tyndall Air Force Base, Florida 32403 Phone: (850) 283-6347 Fax: (850) 283-6279 Email: <u>Gregory.fike@tyndall.af.mil</u>

Gardner Law Firm

Robert Scheffel Wright John T. La Via 1300 Thomaswood Drive Tallahassee, FL 32308 Phone: (850) 385-0070 Fax: (850) 385-5416 Email: <u>schef@gbwlegal.com</u>

<u>/s/ Kenneth L. Wiseman</u> Kenneth L. Wiseman