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June 22, 2015

VIA: ELECTRONIC FILING

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

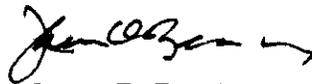
Re: Request to opt-out of cost recovery for investor-owned electric utility energy efficiency programs by Wal-Mart Stores East, LP and Sam's East, Inc. and Florida Industrial Power Users Group; FPSC Docket No. 140226-EI

Dear Ms. Stauffer:

Attached for filing in the above docket is Tampa Electric Company's Prehearing Statement.

Thank you for your assistance in connection with this matter.

Sincerely,



James D. Beasley

JDBpp
Attachment

cc: All Parties of Record (w/attachment)

D. STATEMENT OF BASIC POSITION

Tampa Electric Company's Statement of Basic Position:

The Commission should reject the request to opt-out of cost recovery for investor-owned utility energy efficiency programs filed by Wal-mart Stores East LP and Sam's East, Inc. and Florida Industrial Power Users Group ("FIPUG"). Since the inception of DSM in Florida, this Commission has a longstanding practice of being fair, equitable and reasonable in regards to all ratepayers while minimizing the overall rate impacts of DSM expenditures. Specifically, this Commission has rendered numerous prior decisions that are based upon two foundational principles: Establish DSM goals that create the least amount of upward pressure on customer rates and avoid establishing subsidies across or amongst customers. What Wal-mart and FIPUG are asking for goes against this longstanding practice and foundational principles by purposely putting in cost subsidies between customer classes and allowing some large customers to exempt themselves from helping fund Commission approved DSM programs solely because they are large energy or large demand users, while requiring all other non-eligible or eligible non-participating customers to take on the responsibility for their portion of the utility's cost-effective DSM programs that benefit all customers.

The opt-out proposals advanced by FIPUG and Wal-Mart/Sam's, if approved, would cede to industrial and other large customers the Commission's authority to decide which DSM programs are cost beneficial to all customers, and convert that process into the opt-out customers' individual determinations as to which programs best serve their economic interests.

E. STATEMENT OF ISSUES AND POSITIONS

ISSUE 1: Should the Commission require the utilities to separate their Energy Conservation Cost Recovery expenditures into two categories, one for Energy Efficiency programs and the other for Demand Side Management Programs?

TECO: No. Separating their expenditures in the manner described would represent an erroneous and unwarranted departure from the manner in which ECCR has been administered for the last 30 plus years. All of Tampa Electric's approved DSM measures provide demand and energy savings. Energy efficiency programs clearly provide both energy savings and demand reductions. (Witnesses: Roche, Deason)

ISSUE 2: Should the Commission allow pro-active non-residential customers who implement their own energy efficiency programs and meet certain other criteria to opt-out of the utility's Energy Efficiency programs and not be required to pay the cost recovery charges for the utility's Energy Efficiency programs approved by the Commission pursuant to Section 366.82, Florida Statutes?

TECO: No. This proposal is as inappropriate now as it was in 1981 when the Commission first rejected a similar proposal, and should be rejected for the many

reasons put forth by Tampa Electric's rebuttal witnesses and those for the other IOUs. (Witnesses: Roche, Deason)

ISSUE 3: If the Commission allows pro-active customers to opt-out of participating in, and paying for, a utility's Energy Efficiency's programs, what criteria should the Commission apply in determining whether customers who wish to opt-out are eligible to do so?

TECO: The Commission should not need to reach this issue, as the Commission should reject the very generally described "opt-out" proposals of the intervenors, FIPUG and Wal-Mart/Sam's. If the Commission did have to decide this issue, it is very clear from the testimony submitted in this proceeding that the tests and criteria would be very difficult and costly to devise and administer and would lead to continuing controversy in areas where none has arisen over the life of the ECCR programs, particularly in the form of claims of favoritism and/or undue disadvantage by those customers who do not qualify to opt-out. (Witnesses: Roche, Deason)

F. STIPULATED ISSUES

TECO: None at this time.

G. MOTIONS

TECO: None at this time.

H. PENDING REQUEST OR CLAIMS FOR CONFIDENTIALITY

TECO: None at this time.

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

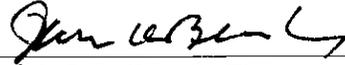
TECO: None at this time.

J. STATEMENT OF COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

TECO: There are no requirements of the Order Establishing Procedure with which TECO cannot comply.

DATED this 22nd day of June 2015.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Prehearing Statement, filed on behalf of Tampa Electric Company, has been served by electronic mail on this 22nd day of June 2015 to the following:

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