

# AUSLEY McMULLEN

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February 12, 2021

**VIA: ELECTRONIC FILING**

Mr. Adam J. Teitzman  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

In re: Proposed Revisions to Rule 25-6.0143, Florida Administrative Code (F.A.C.)  
Statement of Estimated Regulatory Costs - Staff Data Request  
Undocketed: 20210000-OT

Dear Mr. Teitzman:

Attached for filing on behalf of Tampa Electric Company is the company's response to Staff's SERC Data Request (Nos. 1-6) received on January 25, 2021.

Thank you for your assistance in connection with this matter.

Sincerely,



Malcolm N. Means

MNM/bmp  
Attachments

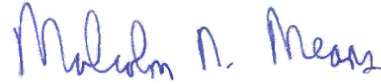
cc: Sevini Guffey, Public Utility Analyst – Economics Division  
All parties of record

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing Responses to Staff's (SERC) Informal Data Request (Nos. 1-6), filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 12th day of February, 2021 to the following:

<p>Adria Harper Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 <a href="mailto:aharper@psc.state.fl.us">aharper@psc.state.fl.us</a></p> <p>Mr. Charles Rehwinkel Mireille Fall-Fry Office of Public Counsel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-400 <a href="mailto:rehwinkel.charles@leg.state.fl.us">rehwinkel.charles@leg.state.fl.us</a> <a href="mailto:fall-fry.mireille@leg.state.fl.us">fall-fry.mireille@leg.state.fl.us</a></p> <p>Mr. Ken Rubin Florida Power &amp; Light Company 700 Universe Boulevard Juno Beach, FL 33408 <a href="mailto:ken.rubin@fpl.com">ken.rubin@fpl.com</a></p> <p>Mr. Kenneth A. Hoffman Florida Power &amp; Light Company 215 S. Monroe Street, Suite 810 Tallahassee, FL 32301 <a href="mailto:ken.hoffman@fpl.com">ken.hoffman@fpl.com</a></p> <p>Ms. Beth Keating Gunster, Yoakley &amp; Stewart, P.A. 215 S. Monroe St., Suite 601 Tallahassee, FL 32301 <a href="mailto:bkeating@gunster.com">bkeating@gunster.com</a></p>	<p>Mr. Russell A. Badders Vice President &amp; Associate General Counsel Gulf Power Company One Energy Place <a href="mailto:Russell.Badders@nexteraenergy.com">Russell.Badders@nexteraenergy.com</a></p> <p>Mr. Ken Plante, Coordinator Joint Administrative Procedures Committee 680 Pepper Building 111 W. Madison Street Tallahassee, FL 32399 <a href="mailto:joint.admin.procedures@leg.state.fl.us">joint.admin.procedures@leg.state.fl.us</a></p> <p>Ms. Dianne M. Triplett Duke Energy Florida 299 First Avenue North St. Petersburg, FL 33701 <a href="mailto:Dianne.triplett@duke-energy.com">Dianne.triplett@duke-energy.com</a> <a href="mailto:FLRegulatoryLegal@duke-energy.com">FLRegulatoryLegal@duke-energy.com</a></p> <p>Christopher T. Wright Florida City Gas 700 Universe Boulevard (JB/LAW) Juno Beach, Florida 33408 <a href="mailto:Christopher.Wright@fpl.com">Christopher.Wright@fpl.com</a></p> <p>Mr. Matthew R. Bernier Senior Counsel Duke Energy Florida 106 East College Avenue, Suite 800 Tallahassee, FL 32301-7740 <a href="mailto:Matthew.bernier@duke-energy.com">Matthew.bernier@duke-energy.com</a></p>
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ATTORNEY

**TAMPA ELECTRIC COMPANY  
UNDOCKETED: PROPOSED  
REVISION TO RULE 25-6.0143  
STAFF'S (SERC) FIRST  
INFORMAL DATA REQUEST  
REQUEST NO. 1  
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FILED: FEBRUARY 12, 2021**

**Re: Rule 25-6.0143 Use of Accumulated Provision Accounts 228.1, 228.2,  
and 228.4, F.A.C.**

1. Proposed revision to Section (1)(e)1 states that the utility may adjust historical monthly contract labor costs charged to operation and maintenance expenses and that each adjustment shall be accompanied by a detailed explanation of the nature and derivation of the adjustment. What are the types of transactional costs involved and what would be the estimated annual incremental regulatory costs including transactional costs to your utility to prepare the detailed contract labor costs adjustments?
  - A. Tampa Electric Company does not anticipate any incremental cost impacts to implement and comply with the proposed modifications to Section 1(e)1 of Rule 25.60143 of the Florida Administrative Code.

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- 2)** Proposed revision to Section (1)(e)8 states that the utility may adjust historical monthly payroll and payroll related costs charged to operation and maintenance expenses and that each adjustment shall be accompanied by a detailed explanation of the nature and derivation of the adjustment. What are the annual incremental regulatory, including transactional costs to your utility to prepare the detailed payroll and payroll related cost adjustments?
- A.** Tampa Electric Company does not anticipate any incremental cost impacts to implement and comply with the proposed modifications to Section 1(e)8 of Rule 25.60143 of the Florida Administrative Code.

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- 3)** Proposed revision to (1)(e)9 states that the utility may adjust historical monthly fuel costs charged to operation and maintenance expenses and that each adjustment shall be accompanied by a detailed explanation of the nature and derivation of the adjustment. What are the annual incremental regulatory, including transactional expenses to your utility to prepare the detailed fuel costs adjustments?
- A.** Tampa Electric Company does not anticipate any incremental cost impacts to implement and comply with the proposed modifications to Section 1(e)9 of Rule 25.60143 of the Florida Administrative Code.

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- 4)** Proposed new language in Section (1)(e)11 states that the utility may adjust historical monthly vegetation management costs specifically related to storm restoration activities, charged to operation and maintenance expenses and that each adjustment shall be accompanied by a detailed explanation of the nature and derivation of the adjustment. What are the annual incremental regulatory, including transactional costs to your utility to prepare the detailed vegetation management cost adjustments?
- A.** Tampa Electric Company does not anticipate any incremental cost impacts to implement and comply with the proposed modifications to Section 1(e)11 of Rule 25.60143 of the Florida Administrative Code.

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- 5)** Proposed new language in Section (1)(e)12 requires the utility to report other costs and expenses not specifically identified in 1 through 11, that are directly and solely attributable to a storm restoration event. What are the estimated annual regulatory, including transactional costs and expenses to your utility to collect and report this information to the Commission?
- A.** Tampa Electric Company does not anticipate any incremental cost impacts to implement and comply with the proposed modifications to Section 1(e)12 of Rule 25.60143 of the Florida Administrative Code.



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- 6)** Please discuss any potential benefits to your utility from the proposed rule revisions for the accounting of electric utilities' costs that result from storm-related damage.
- A.** Tampa Electric Company believes that application of the three-year average to derive incremental storm restoration costs for certain expense categories, subject to the ability to adjust the three-year average, offers a reasonable way to identify incremental costs and may be beneficial to the extent that this methodology helps to avoid litigated issues. Tampa Electric expects that additional effort will be required to calculate the three-year average, but does not expect that this effort will result in material incremental costs.