

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm protection plan cost recovery clause.

DOCKET NO. 20210010-EI

DATED: APRIL 20, 2021

STAFF'S FIRST SET OF INTERROGATORIES TO  
TAMPA ELECTRIC COMPANY (NOS. 1 - 6)

The Staff of the Florida Public Service Commission, by and through its undersigned attorney, propounds the following interrogatories, pursuant to Rule 1.340, Florida Rules of Civil Procedure, to Tampa Electric Company (TECO). These interrogatories shall be answered under oath by you or your agent, who is qualified and who will be identified, with the answers being served as provided by the Rules of Civil Procedure, **and within the time period set out in Order No. PSC-2021-0083-PCO-EI**. As provided by Rule 1.340(a), Florida Rules of Civil Procedure, each interrogatory shall be answered separately and fully in writing under oath unless it is objected to. Each answer shall be signed by the person making it.

Give the name, address, and relationship to TECO of those persons providing the answers to each of the following interrogatories.

If an interrogatory contained herein asks for information that has already been provided or is in the process of being provided to the Commission through a Commission audit, please so state, indicating the date provided and the audit document/record request number.

DEFINITIONS

“You”, “your”, “Company” or “TECO” refers to Tampa Electric Company, its employees and authorized agents.

“Document” refers to written matter of any kind, regardless of its form, and to information recorded on any storage medium, whether in electrical, optical or electromagnetic form, and capable of reduction to writing by the use of computer hardware and software.

“Identify” means:

- (a) With respect to a person, to state the person’s name, address and business relationship (e.g., “employee”) to the Company;
- (b) With respect to a document, to state the nature of the document in sufficient detail for identification in a request for production, its date, its author, and to identify its custodian. If the information or document identified is recorded in electrical, optical or electromagnetic form, identification includes a description of the computer hardware or software required to reduce it to readable form.

INTERROGATORIES

1. Please refer to Witness David Plusquellic's April 1, 2021 testimony at page 5. Please explain why Tampa Electric Company (TECO) “. . . was only able to begin construction on one project in 2020 and made less progress in construction than originally projected.”

2. Please refer to Witness David Plusquellic's April 1, 2021 testimony at pages 7, 10, and 15. Witness Plusquellic notes that the reason for program achievements variances relative to projections was that resources were allocated to mutual assistance support for several weeks for the Transmission Asset Program, Distribution Overhead Feeder Program, and Vegetation Management Program.
  - a. Please describe TECO's Storm Protection Plan program forecasting process and use of contingency factors in addressing uncertainty associated with weather events within TECO's system and off-system.
  - b. Does TECO use the same forecasting process and contingency factors for all of its programs regardless of whether a program may be included in a clause? If not, please explain why and describe the differences.



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4. Please refer to Witness David Plusquellic's April 1, 2021 testimony at page 17 addressing the Transmission Aerial Infrared Patrol.
  - a. What percentage of the 2020 planned Transmission Aerial Infrared Patrol was completed in 2020?
  - b. Has TECO suspended its Transmission Aerial Infrared Patrols?
  - c. Did TECO consider alternative infrared patrols of its transmission system? If not, why?

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5. Please refer to the testimony of Mark Roche, Exhibit MRR-1, Schedule A-5, page 1 of 2.
  - a. Please provide the monthly additions and retirements, by account, for the assets reflected in the calculation of Depreciation Expense for the Transmission Asset Upgrades on Line 2.1.

6. Please refer to the testimony of Mark Roche, Exhibit MRR-1, Schedule A-7, page 2 of 18.
  - a. Please provide the retirement amounts, by month and account, for the assets reflected in the calculation of Depreciation Savings for the Transmission Asset Upgrades on Line 8.b.

*/s/ Margo A. DuVal*

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MARGO A. DUVAL

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**AFFIDAVIT**

STATE OF FLORIDA)

COUNTY OF \_\_\_\_\_)

I hereby certify that on this \_\_\_\_\_ day of \_\_\_\_\_, 2021, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared \_\_\_\_\_, who is personally known to me, and he/she acknowledged before me that he/she provided the answers to interrogatory number(s) \_\_\_\_\_ from STAFF'S FIRST SET OF INTERROGATORIES TO TAMPA ELECTRIC COMPANY (NOS. 1 - 6) in Docket No. 20210010-EI, and that the responses are true and correct based on his/her personal knowledge.

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

\_\_\_\_\_  
Notary Public  
State of Florida, at Large

My Commission Expires:  
\_\_\_\_\_

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clause.

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DATED: APRIL 20, 2021

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of STAFF'S FIRST SET OF INTERROGATORIES TO TAMPA ELECTRIC COMPANY (NOS. 1 - 6) has been served by electronic mail to the following this 20th day of April, 2021:

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*/s/ Margo A. DuVal*

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