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September 9, 2021

VIA ELECTRONIC FILING

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

Re: Petition by Tampa Electric Company for a Limited Proceeding to True-Up Third
SoBRA; Docket No. 20210107-EI

Dear Mr. Teitzman:

Attached for filing in the above docket is Tampa Electric Company's Response to Staff's
Second Data Request (Nos. 1-4), propounded on August 26, 2021.

Thank you for your assistance in connection with this matter.

Sincerely,



Malcolm N. Means

MNM/ne
Enclosure

cc: Service list (w/ enc.)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Response to Staff's Second Data Request (Nos. 1-4), filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 9th day of September 2021 to the following:

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**TAMPA ELECTRIC COMPANY
DOCKET NO. 20210107-EI
STAFF'S SECOND DATA REQUEST
REQUEST NO. 1
BATES PAGE(S): 1 - 2
FILED: SEPTEMBER 9, 2021**

1. Please refer to the Prepared Direct Testimony of Tampa Electric Company (TECO) witness Jeffery S. Chronister, Exhibit No. JSC-1, Page I of 4¹. Please provide a work paper detailing the derivation of the amounts appearing on line (1) for the months of January, February, and March of 2020.
 - A. Please see attached Excel file “(BS 2) Tranche 3 In Svc True-Up Amounts_updated Feb_052421.xls”, which shows the derivation of the amounts appearing on line (1).

¹ Document No. 04308-2021

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20210107-EI
STAFF'S SECOND DATA REQUEST
REQUEST NO. 2
BATES PAGE(S): 3
FILED: SEPTEMBER 9, 2021**

2. Please refer to the Direct Testimony of TECO witness Chronister, Exhibit No. JSC-1, Page 1 of 4 for the following questions:
- a. Regarding the "Total Installed Cost True up" appearing on lines (1) and (10), do these amounts represent the monthly difference between the estimated and actual revenue requirements (specifically related to capital cost differences) associated with the two solar facilities representing TECO's 3rd Solar Base Rate Adjustment (SoBRA)? Please explain.
 - b. Are the estimated revenue requirements associated with the two solar facilities representing TECO's 3rd SoBRA less than the actual revenue requirements being proposed for recovery/true up in this proceeding?
 - c. If the responses to subparts a. and b. are yes, for the month of January 2020, why was only the estimated amount of revenue incorporated into the true up (line 1) given the estimated revenue requirement is below or less than the actual revenue requirement?
- A.
- a. Yes, the amounts appearing on lines (1) and (10) represent the monthly difference between the estimated and actual revenue requirement (specifically related to capital cost differences) associated with the two solar facilities representing Tampa Electric's Third SoBRA. The amounts reflected on line (1), however, are adjusted for in-service timing delays and only include a cost true-up for the number of days each site was in-service.
 - b. Yes, the estimated revenue requirement associated with the two solar facilities representing Tampa Electric's Third SoBRA were less than the actual revenue requirement being proposed for recovery/true-up in this proceeding.
 - c. The "Total Installed Cost True-up" on line (1) is the incremental cost difference between the higher actual revenue requirement and the estimated revenue requirement, adjusted down for the number of days the sites were not in-service when compared to the estimated in-service date.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20210107-EI
STAFF'S SECOND DATA REQUEST
REQUEST NO. 3
BATES PAGE(S): 4
FILED: SEPTEMBER 9, 2021**

3. Please refer to the Direct Testimony of TECO witness Chronister, page 10, lines 5-15. Beginning on line 10, the witness testifies: “[o]n Page 4 of my exhibit, I provide the calculation of adjusted monthly true-up amounts to reflect the project in-service dates. The adjustment is calculated using the actual in-service dates and the daily average for the difference between estimated and actual annual revenue requirement for each project.” Please explain how for the month of January 2020, the “adjusted monthly trueup amount” incorporates “the difference between estimated and actual annual revenue requirement for each project” to arrive at a zero installed cost true-up amount (for January 2020) as indicated on Exhibit No. JSC-1, Page 1 of 4, line (1).

A. Exhibit No. JSC-1, Page 1 of 4, line 1 displays the monthly true-up of the difference between the estimated costs used to set base rates, effective January 1, 2020, and the actual costs for the Third SoBRA. The values on line 1 were derived from the levelized monthly revenue requirement true-up for the Third SoBRA, as evidenced on Exhibit JSC-1, Page 2. For months January, February and March, those values were calculated using the monthly true-up amount and are based on the actual number of days the site(s) were in service each month when compared to the estimate. Neither site was in-service during January 2020, so the resulting cost true up for January is zero under the updated calculation methodology because the entire estimated revenue requirement collected is refunded as the in-service timing true-up. The work paper showing the derivation of the true-up amounts listed on JSC-1, Page 1 of 4, line 1 has been provided in the response to Request No. 1 in Staff’s Second Data Request.

Exhibit JSC-1, Page 4 of 4, Lines 5 through 9 uses the true-up calculation methodology from the First and Second SoBRA True-Up. They display the current monthly revenue requirement true-up for the Third SoBRA, allocated across the months, based on the percentage of the total annual revenue requirement estimate that was projected for each month, then adjusted for the number of days the sites were not in-service. Line 10 shows the difference between the monthly levelized cost true-up amount prior to adjusting for timing (line 9) and the amount that would be deducted for the portion of the month that the sites were not in-service as calculated using a non-levelized monthly true-up allocation, based on the percent of total estimated for each month in the projection filing, adjusted by the number of days the sites were not in-service (lines 6 through 8). This calculation methodology would have resulted in \$1,025 of cost true-up owed to Tampa Electric for January 2020.

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20210107-EI
STAFF'S SECOND DATA REQUEST
REQUEST NO. 4
BATES PAGE(S): 5
FILED: SEPTEMBER 9, 2021**

4. Please refer to the Direct Testimony of TECO witness Chronister, Exhibit No. JSC-1, Pages 1 and 4 of 4, filed in Docket No. 2020144-EI, and Exhibit No. JSC-1, Pages 1 and 4 of 4, filed in Docket No. 20210107-EI for the following questions:²
- a. Concerning Exhibit No. JSC-1, Page 4 of 4, filed in Docket No. 2020144-EI, please explain why the values appearing on lines (13) and (22) correspond exactly to the amounts appearing on Exhibit No. JSC-1, Page 1 of 4, line (1), while for conceptually similar information presented in Docket No. 20210107-EI, the amounts appearing on line (10) of Exhibit No. JSC-1, Page 4 of 4 (filed in Docket No. 20210107-EI) presumably only serve “as a reasonableness check for the amounts on Page 1.”³
 - b. Regarding the values/analysis appearing on Exhibit No. JSC-1, Page 4 of 4, serving as a “reasonableness check” for the values appearing on Exhibit No. JSC-1, Page 1 of 4 (Docket No. 20210107-EI), please fully explain how TECO determines “reasonableness” in this context.
- A.
- a. In Docket No. 20210107-EI, Tampa Electric employed a calculation methodology for the cost true-up, starting with the levelized monthly true-up amount from JSC-1, Page 2 and adjusting for the number of days the sites were in service. The amounts appearing on line (10) of Exhibit No. JSC-1, Page 4 of 4 were calculated using the original methodology applied in Docket No. 20200144-EI and when compared to the true-up amounts shown on line (1) of Page 1, demonstrate that the methodology used on Page 1 of Docket No. 20200144-EI resulted in a true-up that was as favorable or more favorable for customers as the calculation methodology used in Docket No. 20210107-EI.
 - b. Comparing the true-up amounts shown on line (1) of Exhibit No. JSC-1, Page 1 of 4 to the amounts shown on line (10), Page 4 of 4 demonstrate that the methodology used on Page 1 of Docket No. 20200144-EI resulted in a true-up that is not materially different from the true-up calculated using the prior methodology shown on Page 4 of 4 and is slightly more favorable for customers.

²Document Nos. 02326-2020 and 04308-2021, respectively.

³TECO’s response to an informal staff data request via email, provided on 8/24/2021.