



July 13, 2022

VIA: ELECTRONIC TRANSMISSION

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

In re: Review of Storm Protection Plan pursuant to Rule 26-6.030, F.A.C.
Tampa Electric Company; Docket No. 20220048-EI

Mr. Teitzman,

Enclosed for filing in the above dockets are revised versions of the following pages included in the company's 2022-2031 Storm Protection Plan filing (DN 02064-2022, filed April 11, 2022):

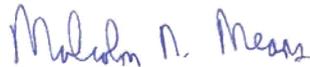
- Bates Stamped Page 103, Exhibit No. DAP-1, Witness: Pickles, Page 71 of 78, Filed: 04/11/2022
- Bates Stamped Page 66, Exhibit No. DLP-1, Witness: Plusquellic, Document No. 1, Page 1 of 1, Filed: 04/11/2022
- Bates Stamped Page 208, Table 7-7 Program Benefit Levels, Exhibit No. DAP-1, Witness: Pickles, Appendix F, Page 79 of 82, Filed: 04/11/2022
- Bates Stamped Page 145, Figure 1-5 Storm Protection Plan Customer Benefit, Exhibit No. DAP-1, Witness: Pickles, Appendix F, Page 16 of 82, Filed: 04/11/2022. The third bullet point on this page is also revised to show a CMI reduction of 29 percent instead of 46 percent.
- Bates Stamped Page 205, Figure 7-2 Storm Protection Plan Customer Benefit, Exhibit No. DAP-1, Witness: Pickles, Appendix F, Page 76 of 82, Filed: 04/11/2022
- Direct testimony of Jason D. De Stigter, Figure 15: Storm Protection Plan Customer Benefit, Page 481 of 486, A50, line 8 is also revised to show total CMI reduction of 29 percent instead of 46 percent.
- Direct testimony of Jason D. De Stigter, Page 485 of 486, in A52, Line 16 changed to total CMI reduction of 29 percent instead of 46 percent.

Substitution of these revised pages is necessary to correct a calculation error identified during preparation for the upcoming hearing in this docket. The error resulted from an incorrect cell reference in a spreadsheet which was used in calculating the Customer Minutes of Interruption (“CMI”) benefits associated with the Distribution Overhead Feeder Hardening Program. This value appears in two tables and a chart contained in the above-identified pages. The tables and chart, as included in the original versions of these pages, showed that the projected reduction in CMI would be 46 percent. After correcting this error, the tables and chart should show a reduction in CMI of 27 percent. This CMI reduction change also impacted the total CMI benefit of the company’s SPP, which should be 29 percent rather than the original total of 46 percent. This change is also reflected in the above-identified pages.

This error affected only the tables, chart, and summary CMI benefits that appear in the above pages, and only the Distribution Overhead Feeder Hardening Program CMI benefit. This error did not have any impacts to the Distribution Overhead Feeder Hardening Program’s projects, prioritization, projected costs, projected restoration cost benefits, monetized CMI benefits, or financial components as presented in the company’s filing.

Thank you for your assistance in connection with this matter.

Sincerely,

A handwritten signature in blue ink that reads "Malcolm N. Means". The signature is written in a cursive style.

Malcolm N. Means

MNM
Enclosure

cc: All parties of record (w/enc.)

Tampa Electric developed the 2022-2031 SPP projected costs and benefits for each of the proposed SPP Programs through the thorough and comprehensive analysis the company performed with 1898 & Co. Tampa Electric and 1898 & Co. modeled the proposed continuing SPP Programs during extreme weather and evaluated the 10-year benefits of these SPP Programs against a status quo scenario. Both the reduction in restoration costs and the reduction in customer minutes of interruption show the percentage improvement expected during major event days from the SPP Programs when compared to the status quo.

Tampa Electric - Proposed 2022-2031 Storm Protection Plan Projected Costs versus Benefits						
Storm Protection Program	Projected Costs (in Millions)		Projected Reduction in Restoration Costs (Approximate Benefits in Percent)	Projected Reduction in Customer Minutes of Interruption (Approximate Benefits in Percent)	Program Start Date	Program End Date
	Capital	O&M				
Distribution Lateral Undergrounding	\$1,070.2	\$2.0	32	45	Q2 2020	After 2031
Vegetation Management	\$0.0	\$324.8	21	22 to 29	Q2 2020	After 2031
Transmission Asset Upgrades	\$139.1	\$5.6	85	14	Q2 2020	2029
Substation Extreme Weather	\$28.8	\$0.0	20 to 25	12 to 45	Q1 2021	After 2031
Distribution Overhead Feeder	\$316.9	\$7.9	54	27	Q2 2020	After 2031
Transmission Access Enhancements	\$31.5	\$0.0	28	55	Q1 2021	After 2031

Tampa Electric developed the estimated annual jurisdictional revenue requirements with cost estimates for each of the proposed 2022-2031 SPP Programs plus depreciation and return on SPP, as outlined in Rule 25-6.030 F.A.C. The estimated annual

Tampa Electric - Proposed 2022-2031 Storm Protection Plan						
Projected Costs versus Benefits						
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Table 7-7: Program Benefit Levels

Program	Restoration Cost Percent Decrease	Storm CMI Percent Decrease
Distribution Lateral Undergrounding	~32%	~45%
Transmission Asset Upgrades	~85%	~14%
Substation Extreme Weather Hardening	20%-25%	12%-45%
Distribution Feeder Hardening	~54%	~27%
Transmission Access Enhancements	~28%	~55%

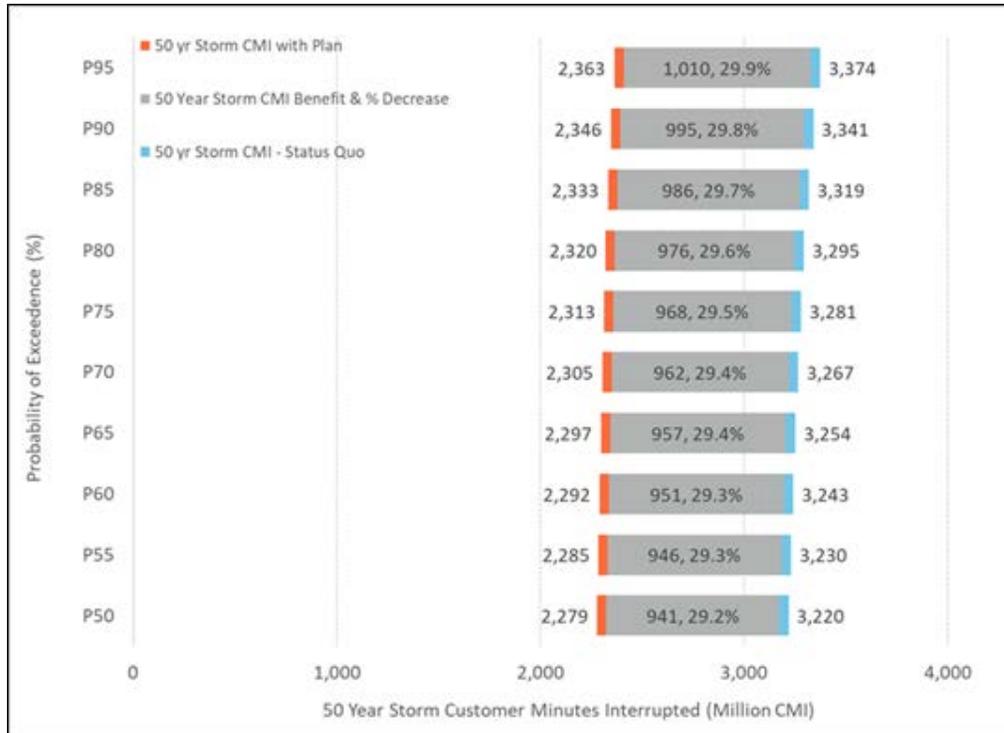
Figure 7-3: Program Benefits vs. Capital Investment



Table 7-7 and Figure 7-3 shows

- Distribution Feeder Hardening and Lateral Undergrounding account for 88 percent of the total capital investment, nearly all the CMI benefit, and approximately 81 percent of the restoration benefit.
- The Distribution Lateral Undergrounding program decreases the storm related CMI and restoration costs for the asset base by approximately 45 and 32 percent, respectively.

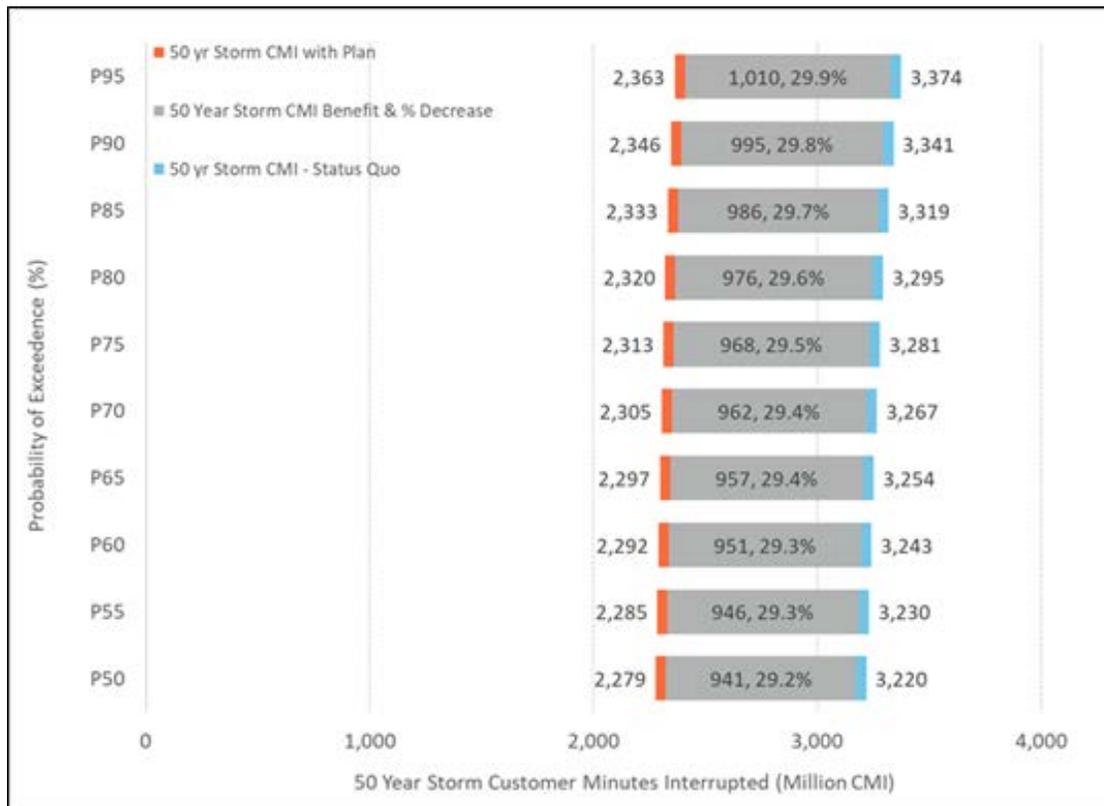
Figure 1-5: Storm Protection Plan Customer Benefit



The following include the conclusions of TEC’s Storm Protection plan evaluated within the Storm Resilience Model:

- The overall investment level of \$1.59 billion for TEC’s Storm Protection Plan is reasonable and provides customers with maximum benefits. The budget optimization analysis (see Figure 1-2) shows the investment level is right before the point of diminishing returns.
- TEC’s Storm Protection Plan results in a reduction in storm restoration costs of approximately 33 to 35 percent. In relation to the plan’s capital investment, the restoration costs savings range from 24 to 33 percent depending on future storm frequency and impacts.
- The customer minutes interrupted decrease by approximately 29 percent over the next 50 years. This decrease includes eliminating outages all together, reducing the number of customers interrupted, and decreasing the length of the outage time.
- The cost (Investment – Restoration Cost Benefit) to purchase the reduction in storm customer minutes interrupted is in the range of \$0.65 to \$0.78 per minute. This is below outage costs from the DOE ICE Calculator and lower than typical ‘willingness to pay’ customer surveys.

Figure 7-2: Storm Protection Plan Customer Benefit



7.2 Program Investment Profile Details

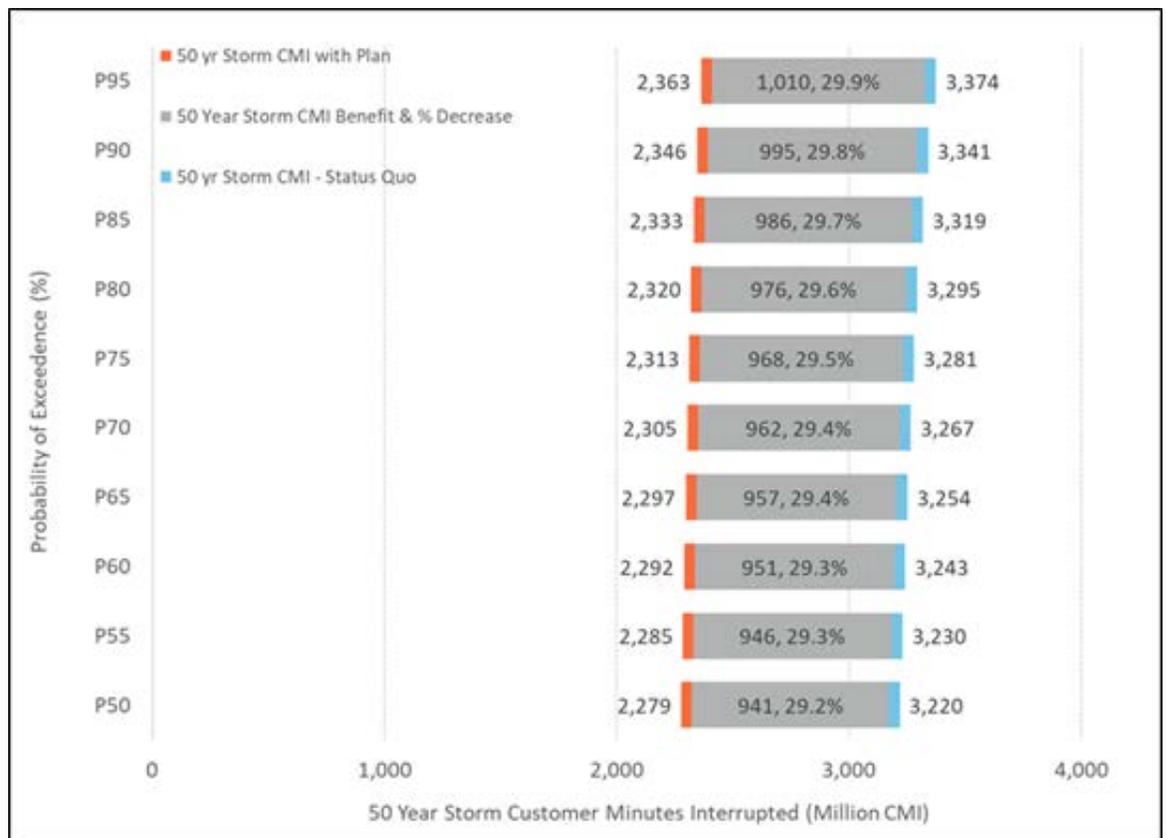
Table 7-3, Table 7-4, Table 7-5, and Table 7-6 show annual investment for the five programs evaluated in the Storm Resilience Model. The tables also show the counts associated with the investment level. For Table 7-3 the total count of circuits being worked on each year is shown. Several circuits are worked on over multiple years. The plan includes upgrading assets on 97 different circuits.

costs.

Q50. What are the customer outage benefits of the plan?

A50. Figure 15 below shows the range in CMI reduction at various probability of exceedance levels. The figure shows relative consistency in benefit level across the P-values with approximately 29 percent decrease in the storm CMI over the next 50 years.

Figure 15: Storm Protection Plan Customer Benefit



Q51. What are the key take-aways from how resilience-based

1 Storm Protection Plan evaluated within the Storm
2 Resilience Model:

- 3 • The overall investment level of \$1.59 billion for
4 Tampa Electric's Storm Protection Plan is reasonable
5 and provides customers with maximum benefits. The
6 budget optimization analysis (see Figure 13) shows
7 the investment level is right before the point of
8 diminishing returns.
- 9 • Tampa Electric's Storm Protection Plan results in a
10 reduction in storm restoration costs of
11 approximately 33 to 35 percent. In relation to the
12 plan's capital investment, the restoration costs
13 savings range from 24 to 33 percent depending on
14 future storm frequency and impacts.
- 15 • The customer minutes interrupted decrease by
16 approximately 29 percent over the next 50 years.
17 This decrease includes eliminating outages all
18 together, reducing the number of customers
19 interrupted, and decreasing the length of the outage
20 time.
- 21 • The cost (Investment - Restoration Cost Benefit) to
22 purchase the reduction in storm customer minutes
23 interrupted is in the range of \$0.65 to \$0.78 per
24 minute. This is below outage costs from the DOE ICE
25 Calculator and lower than typical 'willingness to