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October 27, 2022

VIA ELECTRONIC FILING

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

RE: Docket No. 20220148-EI; Petition to implement 2023 generation base rate adjustment provisions in 2021 Agreement, by Tampa Electric Company

Dear Mr. Teitzman:

The purpose of this letter is to update the Commission on the company's progress updating its 2023 GBRA for the impact of the Inflation Reduction Act of 2022 ("IRA") and to respectfully request that the Commission schedule staff's recommendation in this docket, dated September 22, 2022, for consideration by the Commission as soon as possible so the company's 2023 GBRA as revised in its Original Petition can go into effect with the first billing cycle in January 2023 as contemplated in the 2021 Agreement and subject to refund as discussed below.

The Inflation Reduction Act of 2022 ("IRA") was signed into law on August 16, 2022. Among other things, the IRA increased the investment tax credit ("ITC") applicable to certain renewable energy projects from 26 percent to 30 percent of the cost of the asset and extended the production tax credit ("PTC") in section 45 of the Internal Revenue Code to electricity generated by solar energy facilities. The PTC is a tax credit that reduces income tax expense, the amount of which is based on the amount of energy produced by qualifying assets and is available for solar energy facilities placed into service on or after January 1, 2022, and thereafter. The higher ITC percentage (30%) and PTC in the IRA applies to qualified facilities, including solar generating assets, for which construction began before January 1, 2025.

Tampa Electric filed its Original Petition to update the 2023 GBRA for the effect of the ROE Trigger on August 26, 2022. In footnote 2 to its Original Petition, the company noted that the IRA had become law and indicated that it would update its petition to address the implications of the IRA on the 2023 GBRA as specified in the 2021 Agreement. The staff issued a recommendation to approve the company's Original Petition on September 22, 2022 ("Staff

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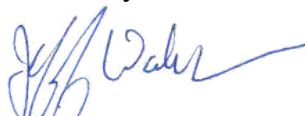
Recommendation”). The item was deferred from the October 4, 2022, agenda so the company could update the 2023 GBRA to reflect the impact of the IRA consistent with the 2021 Agreement.

The company is in the process of updating the 2023 GBRA as reflected in its Original Petition for the impact of the IRA and has begun discussions with the Office of Public Counsel (“OPC”) about its proposed update. For a variety of scheduling reasons, Tampa Electric and OPC have not completed their discussions. Considering the petitions filed by Florida Power and Light and Duke Energy Florida in Docket Nos. 20220165-EI and 20220172-EI and other regulatory activity on the Commission’s calendar in the next four to six weeks, the company does not foresee completing its work with OPC in the short term.

Accordingly, Tampa Electric Company requests that the Commission schedule Staff Recommendation, dated September 22, 2022, for consideration by the Commission as soon as possible so the company’s 2023 GBRA as revised in its Original Petition can go into effect with the first billing cycle in January 2023 as contemplated in the 2021 Agreement. By this letter, Tampa Electric agrees that it will collect the rate increase reflected in the 2023 GBRA subject to refund and that the company will refund the difference between the 2023 GBRA as reflected in the Original Petition/Staff Recommendation and the 2023 GBRA as adjusted for the IRA once the 2023 GBRA updated for the IRA has been approved by the Commission. The company will refund the difference described above through the energy conservation cost recovery clause or some other manner as ordered by the Commission.

I have been authorized by the Office of Public Counsel to represent that it does not object to the Commission granting the procedural request in this letter.

Sincerely,



J. Jeffry Wahlen

JJW/ne

cc: Richard Gentry (OPC)
Charles Rehwinkel (OPC)
Mary A. Wessling (OPC)
Jennifer Crawford (OGC)
Shaw Stiller (OGC)