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# Public Service Commission

February 16, 2023

Mr. J. Jeffry Wahlen  
Ausley Law Firm  
Post Office Box 391  
Tallahassee, FL 32302  
[jwahlen@ausley.com](mailto:jwahlen@ausley.com)

**STAFF'S SECOND DATA REQUEST  
VIA EMAIL**

**Re: Docket No. 20220186-EI –Petition for Approval of Purchased Power Agreement between Tampa Electric Company and with Pasco County**

Dear Mr. Wahlen:

By this letter, Commission staff requests that Tampa Electric Company (TECO or Company) provide responses to the following data request.

1. Please refer to Staff's First Data Request, Question 1.B. Please verify that the fuel forecast used is the same as TECO's Midcourse Correction filing in Docket No. 20230001-EI. If not, please explain why not. As part of this response, identify when the fuel forecast used in the response was developed.
2. Please refer to Section 12 of the Purchased Power Agreement (PPA). How will the Public Service Commission be informed of a third party sale of Renewal Energy Credits (RECs)? Also, what administrative costs are associated with the RECs?

For the following questions, please refer to Section 5 of the PPA.

3. Please discuss how this section of the PPA complies with Rule 25-17.0889, Florida Administrative Code (F.A.C.). Specifically, explain how the PPA is consistent with the requirements that a Qualifying Facility (QF) seek these services.
4. Please discuss how this section of the PPA complies with Rule 25-17.0883, F.A.C. Specifically, explain how the PPA is consistent with the requirements that a QF seek these services.

5. Please refer to TECO's most recent Standard Offer Contract, specifically Section 6 on Tariff Page No. 8.214. Please verify that under the Standard Offer Contract, the QF would be responsible for all transmission delivery to TECO's interconnection.
6. Does Section 5 of the PPA transfer risk associated with transmission service rates from the QF to TECO's ratepayers? If so, what benefits would TECO's ratepayers receive by assuming this risk? If not, please explain who bears the risk for transmission service rate increases.
7. Regarding a potential transmission study and associated costs, please provide the estimated cost of a transmission study and explain whether it was included in the Company's cost-effectiveness analysis provided as part of its Petition and in response to Staff's First Data Request Question No 1.
  - a. If the Commission approves the PPA, does TECO believe the transmission study costs are eligible for cost recovery from its ratepayers? If so, please explain.
8. If the transmission study determines additional transmission upgrades are needed, how would the Commission be notified of TECO's choice to either pay for transmission upgrades or cancel the PPA?
  - a. If TECO elects to pay for transmission upgrades, would the Commission have an opportunity to review TECO's decision separate from the approval of the PPA? If so, please explain.
  - b. If TECO elects to pay for transmission upgrades, does TECO believe any transmission upgrades it elects to pay for would be eligible for cost recovery from its ratepayers? If so, please explain.
  - c. If TECO elects to pay for transmission upgrades, where would TECO seek cost recovery?
9. Please provide the anticipated administrative costs associated with arranging transmission for the QF through DEF's territory. As part of your response, state whether this cost was included in the Company's cost-effectiveness analysis provided as part of its Petition and in response to Staff's First Data Request Question No. 1.

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Please file all responses no later than **March 2, 2023**, via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form (reference Docket No. 20220186-EI). Please contact me by phone at (850) 413-6582 or by email at [Gdavis@psc.state.fl.us](mailto:Gdavis@psc.state.fl.us), if you have any questions.

Sincerely,

*/s/ Phillip G. Davis*

Phillip G. Davis

Engineering Specialist

PGD:jp

cc: Office of Commission Clerk (Docket No. 20220186-EI)

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