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August 21, 2023

**VIA: ELECTRONIC FILING**

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

Re: Tampa Electric Company's Petition for Approval of Shared Solar Tariff Change  
FPSC Docket No. 20230072-EI

Dear Mr. Teitzman:

Attached for filing are Tampa Electric Company's answers to Staff's Second Data Request (Nos. 1-21), propounded and served by electronic mail on August 11, 2023.

Sincerely,

A handwritten signature in blue ink that reads 'Malcolm N. Means'.

Malcolm N. Means

MNM/bml  
Attachment

cc: Shaw Stiller  
Paula Brown  
Jordan Williams  
TECO Regulatory Department

**TAMPA ELECTRIC COMPANY  
DOCKET NO. 20230072-EI  
STAFF'S SECOND DATA REQUEST  
REQUEST NO. 1  
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1. The utility's Responses to Staff's First Data Request, Item 3(A), states, in part, that the proposed SSR-1 rate is expected to be higher than the 2024 fuel charges. Explain how TECO arrived at that expectation quantitatively for all rate classes. Please specifically discuss whether and how TECO included sales volume in arriving at that expectation.
  
- A. Please see the table below for Tampa Electric's 2024 fuel charges. These factors were calculated using updated 2024 fuel and purchased power costs and billing determinants.

<b>Rate Class</b>	<b>2024 Fuel Factor</b>
RS	3.536
Distribution Secondary	3.843
Distribution Primary	3.805
Transmission	3.766
Lighting	3.806

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2. The utility's Responses to Staff's First Data Request, Item 3(C), discusses that its current fuel rate is higher than the proposed SSR-1 rate, although the projected fuel rate for 2024 is expected to be lower than the proposed SSR-1 rate, and explains that fuel prices fluctuate. Please answer the following:
- a. Is it correct that residential class participants of the SSR-1 program may or may not receive a lower total cost of service under the SSR-1 tariff, as opposed to residential non-participants, depending upon fuel price? Please discuss.
  - b. If it is correct that residential participants can expect nearly the same total cost of service as non-participants, depending upon fuel price, would the proposed SSR-1 rate provide an incentive to participate in the program rather than remain on standard service due to the attractive aspects of avoiding fuel price fluctuations (annual adjustments, mid-course corrections, etc.)? Please discuss.
- A.
- a. Yes. Individual residential customers may or may not receive a lower bill as a result of participating in the SSR-1 program. This is dependent upon the SSR-1 rate relative to the fuel rates. If the SSR-1 rate is lower than Tampa Electric's published fuel rates, participating customers benefit financially from participating in the program and vice versa. Tampa Electric recognizes solar assets do not generate electricity 24 hours a day. For that reason, Tampa Electric included load following costs, also referred to as Shaping and Firming, to ensure SSR-1 participating customers pay their fair share of generation costs, meaning that Tampa Electric included system lambda and generation capacity avoided costs for hours solar assets are not producing in the proposed SSR-1 rate change.
  - b. Tampa Electric believes a more competitive price point, reaching decarbonization goals, and having the opportunity to mitigate fuel price fluctuations makes the proposed SSR-1 rate and program attractive to customers that prefer a fixed portion of their bill. The SSR-1 program provides a greater level of bill stability which incentivizes customers, who are looking to avoid fuel price fluctuations, to participate. The proposed SSR-1 rate is lower than Tampa Electric's current fuel rates, but that is not expected to remain true in 2024.

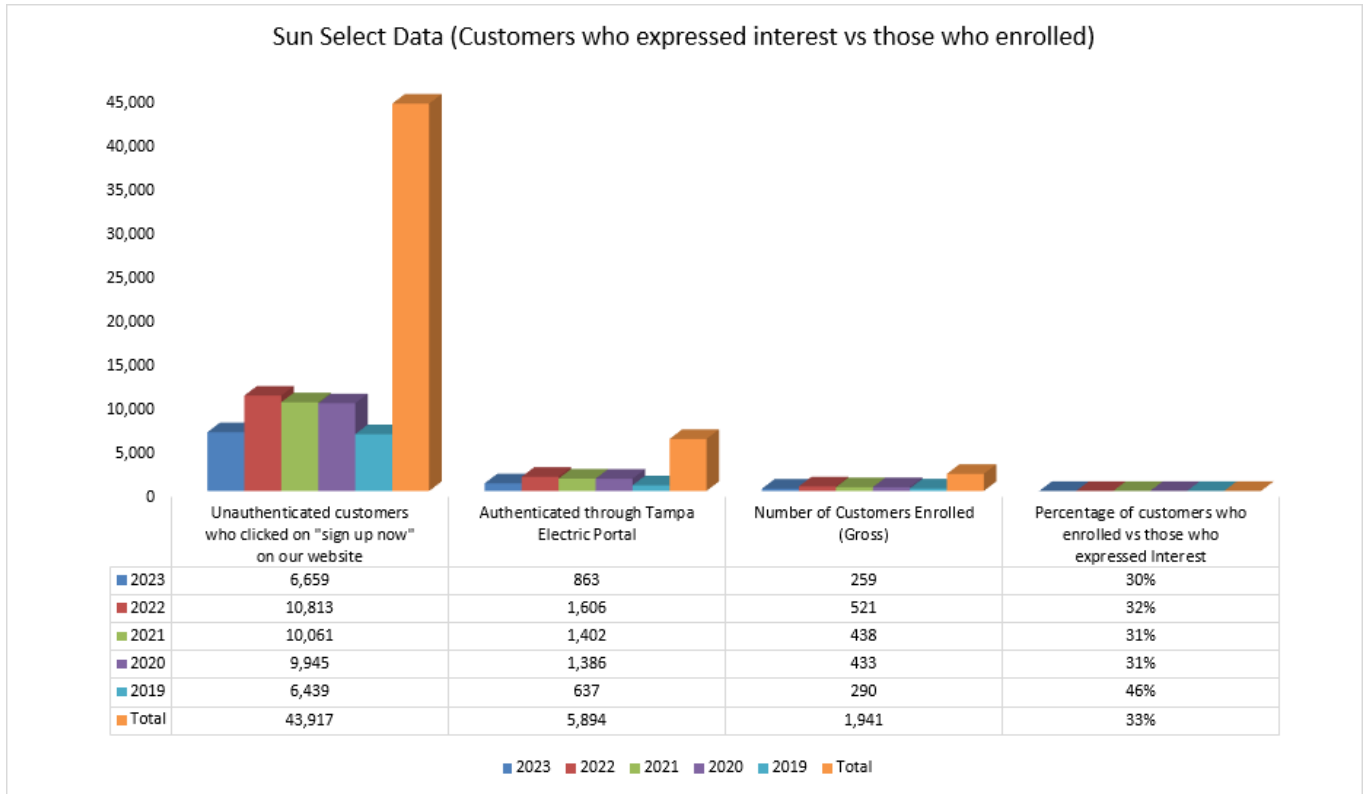
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- 3.** Please provide the calculation(s) to support the conclusion referenced in the utility's Response to Staff's First Data Request, Item 4 (H), regarding fixed fuel costs.
  
- A.** Please see Tampa Electric's electronic attachment in MS Excel format containing the provided Excel spreadsheet titled "(BS 4) Docket 20230072-EI Second Data Request Answer #3."

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4. The utility's Responses to Staff's First Data Request, Item 4(B), states, in part, that the utility did not pre-enroll customers in the program but rather plans to "discuss the price reduction with customers who previously expressed interest." Please answer the following:
- a. Please estimate the number residential customers who previously expressed interest in the program but did not enroll.
  - b. Please estimate the number small business customers who previously expressed interest in the program but did not enroll.
  - c. Please estimate the number commercial and/or industrial customers who previously expressed interest in the program but did not enroll.
  - d. If this program is approved, please describe how the utility plans to market it to residential customers who have not previously expressed interest?
  - e. If this program is approved, please describe how the utility plans to market it to small business and/or to C/I customers who have not previously expressed interest?
  - f. If this program is approved, please describe any screening methods or selection process the utility will use for enrolling customers in the program. Express in your response if enrollment will be conducted on a first-come-first-serve basis, or what selection criteria (customer class, subscription level, projected MW usage, or other) will be used to determine which customers may enroll?
- A. a. The company has not formally tracked this activity; however, website analytics are provided to show the percentage of customers—residential and business—that enrolled and those that expressed interest via our customer portal. The "unauthenticated" portion of the graph includes clicks from customers and potentially people or businesses that may not be a customer of Tampa Electric.

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- b. While the company has not formally tracked the interest of small business customers, many small business customers have provided feedback to the phone team supporting them on their interest in a community solar program. The most common reason cited by these customers for not participating in the program is the cost.
- c. The Key Account Managers and Midmarket Account Manager serve most of the medium and large business accounts in Tampa Electric’s service area. While the company has not formally tracked the interest of small business customers, this team has worked with customers and has had many conversations over the past few years regarding Tampa Electric’s SSR-1 program. The most common reason cited by these customers for not participating in the program is the cost.
- d. Tampa Electric plans to market the program to its residential customers using multiple marketing channels, including but not limited to:

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- o Depending on the rate of subscription, Tampa Electric may use elements of a coordinated omni-channel campaign to attract customers who have not previously expressed interest, as follows.
  - Social Media Campaign - Leads to Sun Select enrollment/"more info" page
  - Lead-Magnet ads on existing website that lead to the existing or new additional landing page; updated content for landing pages
  - Word of mouth from TEC employees
  - Customers who call in to start new service are made aware of the optional program
  - IVR call system messages when customers call us
  - Bill Inserts
  - Newsletter articles or mentions. (TECO Cares is an opt-in newsletter available to all customers.)
  
- e. Tampa Electric plans to market the program to its commercial and industrial customers in the same manner as residential customers. Please see the response to subpart d.
  
- f. There is no change to the structure of the program and its enrollment process. All customer classes are treated in the same manner. Eligible rates may enroll on a first-come-first-served basis via their customer portal or through a customer service representative. Ineligible rates (e.g., NM-1, GDST) are automatically prevented from enrolling. Enrollment is also contingent upon kWh availability. Customers will be put on a waitlist if the program is at capacity.

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5. The utility's Responses to Staff's First Data Request, Item 4(D), asserts that the utility "expects customer interest in the program to increase." Please clarify that response to express which customer class (residential, small or large business) the utility expects the greatest increase in new participation to come from.
- A. Current enrollment in the program consists of 1,906 residential customers, 36 commercial customers, and zero industrial customers through the end of July 2023. Residential customers accordingly make up the largest group of subscriptions by number of participating customers. Commercial customers, however, make up a larger percentage of subscriptions in terms of capacity and energy due to their greater usage on a per-customer basis.

The current program has experienced an average churn rate of 46 percent since the program launched in 2019 and 49 percent of customers that choose to leave the current program cite "Costs too much" as their reason for leaving. The utility expects the new lower price point to drive more residential customers to join and remain subscribed to the program, reducing the churn rate, and increasing the number of customers that participate in the program.

Similarly, the Business & Industry and Account Management teams have marketed Sun Select for several years to small and large commercial and industrial customers. Many of those customers have expressed interest in joining the program to support their sustainability goals with the most cited reason for not participating in the program being the cost.

Even if the participation cost is reduced through this filing, Tampa Electric expects the existing mix of subscribers, both in terms of proportions of customers by class and proportion of capacity and energy by class, to stay roughly the same.



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- 6.** The utility's Responses to Staff's First Data Request, Item 6(D), states, in part, that non-participants would benefit from this program. Non-participants will continue to pay a fuel cost recovery charge that is subject to fuel price volatility, whereas participants in this program will not pay a fuel recovery charge. Please explain how non-participants benefit when fuel price volatility is only absorbed by them (and not shared across all customers that continue to pay a fuel charge).
- A.** Non-participants benefit when fuel prices are lower than that of the proposed SSR-1 rate. Furthermore, as explained in the company's response to Staff's First Data Request No. 9c, Shaping and Firming costs are included in the program charge development. As a result, participants will pay their share of fuel costs when solar generation is not available.

The total revenue collected from this program, including the value of monetized Renewable Energy Credits ("REC") collected in the proposed SSR-1 charge, benefits non-participating customers. Commission Order No. PSC-2019-0215-TRF-EI, issued June 3, 2019, in Docket No. 20180204-EI states, at page 5, "The revenues collected under the tariff will be revenue credited to the revenue requirement as an offset." This revenue offsets the company's revenue requirement which puts downward pressure on non-participating customers' base rates.

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7. Is it correct that because participating customers do not pay a fuel cost recovery charge, then Fuel Cost Recovery Revenue will decline as a result of customers enrolling in this program? If so, please answer the following:
- a. For the general body of rate payers, how is the decline in Fuel Cost Recovery Revenue re-paid?
  - b. Please provide a dollar estimate of the decline in Fuel Cost Recovery Revenue for the estimated life of the SSR-1 Tariff program generation assets, or a minimum of the next 20 year period, based on the assumption of:
    - i. Full subscription of this program by customers from the residential customer class.
    - ii. Full subscription of this program divided equally between customers from the residential and commercial/industrial customer classes.
    - iii. Full subscription of this program by customers from the commercial/industrial customer class.
  - c. Please provide a dollar estimate of the base rate revenues from this program for the estimated life of the SSR-1 Tariff program generation assets, or a minimum of the next 20 year period, based on the assumption of:
    - i. Full subscription of this program by customers from the residential customer class.
    - ii. Full subscription of this program divided equally between customers from the residential and commercial/industrial customer classes.
    - iii. Full subscription of this program by customers from the commercial/industrial customer class.
- A. No. The change in sales at full SSR-1 subscription does not change any of the customer segment fuel factors billed to customers. In addition, the potential for lost fuel revenue due to this program change is de minimis and would likely occur regardless of this program since SSR-1 participants can build their own PV installations and therefore would, in either case, consume their solar energy from a resource that would not add cost or revenues to the fuel clause.

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**8.** Please provide the estimated annual base rate, fuel clause, and total impact of the program to a participant and non-participant bill for a residential customer using 1,200 kWh monthly for each year of the estimated life of the SSR-1 Tariff program generation assets, or a minimum of the next 20 year period.

**A.** Tampa Electric does not forecast base rates or fuel factors for the next 20 years. However, assuming current base and clause rates and the proposed SSR-1 rate, a non-participant consuming 1,200 kWh would have a monthly bill of \$193.34. A 100% subscribed SSR-1 participating customer would have a monthly bill of \$191.19. For the non-participant and participant, base rates would be the same amount at \$101.45. For the non-participant, the fuel clause charge would be \$60.90. For the participant, the SSR-1 charge would be \$58.80.

Assuming 2024 proposed base, clause, and SSR-1 rates, a non-participant consuming 1,200 kWh would have a monthly bill of \$172.22. A 100% subscribed SSR-1 participating customer would have a monthly bill of \$186.95.

For the non-participant and participant, base rates would be the same amount at \$103.40.

For the non-participant, the fuel charge would be \$44.43.

For the participant, the SSR-1 charge would be \$58.80.

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- 9.** Paragraph 15 in the utility's Petition indicates a desire to cap participation at 30 MWs. If Commission approval is granted, describe what future actions would be needed to modify the cap (higher or lower than 30 MWs).
  
- A.** If this petition is approved, then a new petition to change the cap, as well as the Commission's approval of that petition, would be required to change the cap from 30 MW.

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- 10.** Paragraph 16 in the utility's Petition indicates the proposed tariff changes "will allow Tampa Electric to learn more about customer adoption of community solar programs and customers' desire to reach decarbonization goals." Please answer the following:
- a. What community solar programs from public, private, or municipal Florida utilities in Florida did Tampa Electric study when it sought to make changes to its program?
  - b. Based on the utility's response to sub-part (A) above, what community solar programs from public, private, or municipal Florida utilities in Florida use a cost approach similar to Tampa Electric's instant proposal?
  - c. Based on the utility's response to sub-part (A) above, what community solar programs from public, private, or municipal Florida utilities in Florida offer a kWh credit to participating customers, rather than exempting participating customers from paying a fuel recovery charge and, instead, charging a kWh rate (which is similar to Tampa Electric's instant proposal)?
  - d. Specifically describe how Commission approval of the proposed tariff changes will "allow Tampa Electric to learn more about customer adoption of community solar programs."
  - e. Specifically describe how Commission approval of the proposed tariff changes will allow Tampa Electric to learn more about customers' desire to reach decarbonization goals."
- A.** This program is fair to participants and non-participants because participants are paying the full cost to serve the program with solar energy, are not paying additional costs that are not incurred for the service, such as fuel costs, and non-participants do not have to pay costs allocated to the participants.
- a. When we created the Sun Select program, we reviewed programs that existed at the time, such as at City of Tallahassee and Jacksonville Electric Authority. We also reviewed programs across the nation. We modeled the program after the City of Tallahassee community solar program. As we began to update our Sun Select program, we reviewed the Florida Power & Light ("FPL") and Duke Energy Florida ("DEF") programs. Due to criticisms of cost elements or allocations for the latter two programs, Tampa Electric followed an avoided cost methodology and ensured that participants would fully pay for this program in the SSR-1 proposed rate update.

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- b. Tampa Electric is not aware of the specifics of each cost approach used by the utilities referred to in the response to Staff's Second Data Request No. 10a.
- c. Tampa Electric understands that the FP&L and DEF programs are calculated in this manner but is not aware of the methods used for other programs.
- d. From experience with the I SSR-1 tariff as currently designed, Tampa Electric learned that over 45% of customers enrolled in community solar want a lower cost to "go green" and de-enrolled from the program. The top reason for leaving the program was "costs too much". A reduction in the de-enrollment rate will confirm that cost is a primary factor in adoption of community solar programs. In addition, if enrollment does not increase at a lower price, it may indicate that customers may want to have community solar but are not willing to pay the cost. This would lead the company to reevaluate the offering.
- e. From the original SSR-1, Tampa Electric learned that over 45% of customers enrolled in community solar want a lower cost to "go green" and de-enrolled from the program. The advent of corporate sustainability and climate goals across the globe has prompted Tampa Electric to design and provide customer programs that assist customers with achieving the environmental components of those goals, which typically includes renewable energy targets. The SSR-1 program update will help us learn more about the dollar value that customers place on renewable energy and their ability to claim REC to achieve sustainability goals.

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- 11.** How frequently does TECO propose to review and revise the proposed SSR-1 tariff rate?
  - A.** Tampa Electric has no plans to change the SSR-1 tariff rate from the current proposal at this time. If the program is not subscribed with the proposed change, then the company may reevaluate the offering in the future.

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- 12.** What factors does TECO plan to use and monitor to indicate whether the SSR-1 tariff rate should be reviewed and/or revised?
  - A.** Tampa Electric currently monitors the de-enrollment reasons and rates monthly and periodically evaluates whether the program should be revised. For instance, this petition was filed as a result of this monitoring. The intent of this petition is to respond to the cost concerns expressed by de-enrolling customers and to potentially expand customer access to this renewable energy opportunity. In addition, if the cost of solar generation decreases significantly and we increase our solar generation capacity to include such lower cost solar generation, then the company may re-evaluate the offering.



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- 13.** Please identify asset and program costs:
- a. Recovered under the original SSR-1 Tariff when the tariff was first approved on June 3, 2019.
  - b. Recovered under the SSR-1 Tariff as a result of the 2021 Settlement Agreement.
  - c. Asset and program costs projected to be recovered under the proposed SSR-1 Tariff.
- A.**
- a. Please see “CE Costs” in Tampa Electric’s electronic attachment in MS Excel format containing the provided Excel spreadsheet titled “(BS 19) Docket 20230072-EI Second Data Request Answer #13.” This provides the annual program costs.  
  
Please see “Input Data” in Tampa Electric’s electronic attachment in MS Excel format containing the provided Excel spreadsheet titled “(BS 19) Docket 20230072-EI Second Data Request Answer #13.” Please see cell C50 for the asset costs.  
  
These have not been fully recovered. Since the program’s inception through June 2023, Tampa Electric has recovered \$2,219,358 via the SSR-1 charge. Commission Order No. PSC-2019-0215-TRF-EI, issued June 3, 2019, in Docket No. 20180204-EI states, at page 5, “The revenues collected under the tariff will be revenue credited to the revenue requirement as an offset.”
  - b. Tampa Electric does not assign cost recovery on an asset-specific basis. The revenues were credited against the need for additional base revenue in MFR E-13c submitted in Tampa Electric’s most recent rate case that was ultimately settled by Commission approval of the 2021 Settlement Agreement. Program and asset values are as described in the response to part a (program costs) and part c (asset values of solar generation portfolio).
  - c. Please see “Table 2 Program Costs” in Tampa Electric’s electronic attachment in MS Excel format containing the provided Excel spreadsheet titled “(BS 11) Docket 20230072-EI First Data Request Answer #6, #9, & #10.” Please see cells C40 through C49.

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Please see "Table 3 Plant Portfolio Costs" in Tampa Electric's electronic attachment in MS Excel format containing the provided Excel spreadsheet titled "(BS 11) Docket 20230072-EI First Data Request Answer #6, #9, & #10)." Please see row 28 and 30.

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- 14.** If the costs recovered under the SSR-1 Tariff changed as a result of the Settlement Agreement, please provide all documentation explaining the reasons for the change that were included in filings to the Commission in Docket No. 20210034-EI or otherwise explained in the annual reports to the Commission.
  
- A.** The costs recovered under the SSR-1 Tariff did not change as a result of the Settlement Agreement.

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- 15.** Please refer to Order No. PSC-2021-0423-S-EI approving TECO's 2021 Settlement Agreement, specifically paragraph 14. Please answer the following:
- a. Explain how the Petition is consistent with the restriction that TECO shall not recover any of the same costs previously collected under base rates or another tariff given the usage of TECO's existing portfolio of solar generation assets to provide the additional 12.5 MW of capacity for the SSR-1 Tariff program.
  - b. Has TECO contacted any of the signatories of the 2021 Settlement Agreement regarding this tariff offering, and if so, what were their response(s)?
- A.**
- a. Tampa Electric is not recovering the same costs through both the SSR-1 tariff and base rates. The SSR-1 Program is an optional program. The revenues collected under this optional program are credited to the base rates revenue requirement, putting downward pressure on base rates and avoiding double recovery.
  - b. Tampa Electric has not contacted signatories of the 2021 Settlement Agreement about the proposed SSR-1 rate change.

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- 16.** Please explain whether TECO is constructing any specific new incremental solar generation as a result of the program expansion from 17.5 MW to 30 MW.
- a. If TECO is constructing new incremental solar generation, please identify the solar project(s), their timing and financial estimates similar to the Ten-Year Site Plan Schedule 9 for the project(s).
  - b. If TECO is not constructing new incremental solar generation, please explain why TECO elected to include a credit for capacity.
  - c. Please provide an estimate of the SSR-1 levelized rate per kWh if the Capacity Credit is removed from the calculation.
- A.**
- a. Tampa Electric is not constructing incremental solar generation as a result of the program expansion from 17.5 MW to 30 MW.
  - b. The proposed SSR-1 tariff credit for capacity is designed to ensure the customer is not paying for capacity twice. Customers participating in the SSR-1 Program pay base rates, just like any other customer. Generating capacity costs are embedded in Tampa Electric's base rates. The proposed SSR-1 rate provides a capacity credit to avoid double-charging customers for the capacity costs- of the embedded cost for solar generation capacity the customer pays in the SSR-1 tariff rate. Tampa Electric did not credit the full embedded generation costs included in base rates, only the marginal or "avoided" cost of generation. This ensures that the SSR-1 customer is paying the full embedded cost of the renewable portfolio as well as a contribution to generation capacity in base rates.
  - c. Excluding the capacity credit, the proposed SSR-1 rate would be \$0.064 per kWh. However, to fully reflect an estimate of the proposed SSR-1 Tariff, the capacity costs included in the shaping and firming charge would need to be removed too, resulting in a rate of \$0.054 per kWh. (By removing the credit for capacity and including the capacity in the Shaping and Firming charge would result in the proposed SSR-1 customer paying for generation capacity three times. One via the SSR-1 rate that includes the full embedded costs of the renewable portfolio, the customer paying for generation capacity costs, already covered in the SSR-1 rate, in the base rate and paying for generation capacity costs for the generation the customer uses at times the renewable portfolio is not generating electricity.) These components are summarized in the following table and included in

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the workpapers provided in the company's response to Staff's First Set of Data Requests.

	Weighted Average
Capacity in Load Following	1.0
Capacity Credit	(1.5)
New Rate	4.9
Rate Excluding Generation Capacity	5.4
Participation Weights	

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17. Please explain whether TECO considered avoided generation and/or fuel and emissions as part of its requests for approval of its existing portfolio of solar generation assets. If so, please explain how these assets can create additional avoided generation and/or fuel after their installation by using a portion of their capacity in the SSR-1 Tariff program.
  - A. Tampa Electric considers the avoided generation and fuel costs when reviewing the cost effectiveness of adding a renewable resource. The assumptions included in the proposed SSR-1 Tariff do not assume these existing assets create additional avoided generation, but rather the avoided generation costs are the best representation of the cost to serve the SSR-1 customer such that the rate can be designed to fully recover all costs.

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**18.** Please explain how the general body of ratepayers will be compensated for assets taken away from their usage for the exclusive usage of SSR-1 Tariff program participants, including energy and capacity. If no assets are being removed from the general body of ratepayers, how does TECO justify using them for its rate calculation of the SSR-1 Tariff program?

**A.** The SSR-1 revenues are included in the company's base revenues for surveillance reporting and credited to the revenue requirement when developing base rates as required by Commission Order No. PSC-2019-0215-TRF-EI, issued June 3, 2019. This is evident in Docket No. 20210034-EI, Minimum Filing Requirement Schedule E-13c. The crediting of revenues collected from SSR-1 participating customers puts downward pressure on base rates which benefits the general body of rate payers.

Because SSR-1 is a cost-based rate, the revenue credit effectively removes (from the general body of ratepayers) the portions of the assets being used when base rates are reset. The revenue credit is how the general body of ratepayers is compensated for the use of the solar assets serving the SSR-1 program.



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- 19.** Please describe the company's efforts to monetize Renewable Energy Credits (RECs) for the past 5 years.
- a. Provide the average annual historic sale price for the last 5 years, and an estimate of the annual REC price for the next 30 year period.
  - b. Please explain if the \$5/MWh Renewable Generation Value component of the levelized rate will be treated the same as proceeds from REC sales. If not, please provide a comparison of how they are treated versus if they were treated as a typical REC sale.
- A.** Tampa Electric has not sold any REC in the past five years.
- a. Tampa Electric does not have historic sale prices or an estimate of the annual REC price for the next 30 years.
  - b. No. Tampa Electric is assigning a value to the REC for rate-setting purposes. All proceeds are included in the credit of SSR-1 rate to base rates. This ensures that the additional REC value paid for by SSR-1 customers is credited against the embedded cost of the renewable assets in Base Rates.

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- 20.** Please verify whether the current SSR-1 Tariff as approved in 2019 and included in the 2021 Settlement Agreement did not include net benefits from energy or capacity associated with the incremental generation of the 17.5 MW portion of the Hancock solar facility in its calculation of the levelized rate, but instead justified the removal of fuel clause payments as offset by the incremental avoided fuel and capacity?
- a. If so, please explain why TECO believes it is appropriate to include the net benefits both in the levelized rate for SSR-1 Tariff program participants and to still exclude program participants from fuel clause payments.
- A.** The SSR-1 Tariff as approved in 2019 was designed based on the actual embedded cost of the Lake Hancock asset plus program costs. There was no consideration for the Shaping and Firming costs of serving customers for the times the customer is using electricity, but the generation asset is not producing energy, and conversely credited for the value of the energy and capacity of the generation that is occurring when the SSR-1 customer is not consuming but the generation asset is producing. Similarly, the SSR-1 Tariff did not consider that the customers were paying for the cost of the renewable capacity in both the SSR-1 rate and the base rate. Nevertheless, the justification of including the SSR-1 in lieu of fuel cost is primarily from the fact that these SSR-1 customers are not contributing to the fuel costs because they are using the renewable asset that has no fuel cost.
- a. The use of the fuel clause exclusion as the appropriate mechanism for the SSR-1 Tariff is appropriate for several reasons. First, it ensures the SSR-1 customer is not subject to the volatility of the fuel clause given changes in fuel used by Tampa Electric's conventional fleet while the customer is paying the full embedded cost of the renewable asset that is protecting them from this fuel exposure. Second, it reflects the customer's perspective that they are using clean energy by participating in the SSR-1 Tariff. Lastly, the revised SSR-1 Tariff, with the Shaping and Firming costs included, reflects the potential costs the SSR-1 customer creates by consuming electricity when the renewable asset is not generating and thus fuel costs are being incurred by Tampa Electric.

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- 21.** Please verify whether the proposed SSR-1 Tariff includes a 1 cent per kWh adder for residential usage greater than 1,000 kWh. If not, explain why not and provide a comparison between the current fuel clause charge above 1,000 kWh and the proposed SSR-1 Tariff rate.
- A.** The proposed SSR-1 Tariff does not include a 1 cent per kWh adder for residential usage greater than 1,000 kWh. The SSR-1 rate does not have a 1 cent adder because it was originally proposed as a levelized rate and approved as a levelized rate in Order No. PSC-2019-0215-TRF-EI.

The proposed SSR-1 rate is \$0.049 per kWh. The current residential fuel rate for consumption above 1,000 kWh is \$0.05908 per kWh.