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July 1, 2024

VIA HAND DELIVERY

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

REDACTED

In re: Petition for Rate Increase by Tampa Electric Company	DOCKET NO. 20240026-EI
In re: Petition for approval of 2023 Depreciation and Dismantlement Study, by Tampa Electric Company	DOCKET NO. 20230139-EI
In re: Petition to implement 2024 Generation Base Rate Adjustment provisions in Paragraph 4 of the 2021 Stipulation and Settlement Agreement, by Tampa Electric Company	DOCKET NO. 20230090-EI

CONFIDENTIAL DOCUMENTS ENCLOSED

Dear Mr. Teitzman:

Pursuant to an Amended Request for Confidential Classification and Request for Temporary Protective Order on behalf of Tampa Electric Company, which is being filed simultaneously with your office, please find enclosed confidential information pertaining to Tampa Electric's answers to Office of Public Counsel's Tenth Set of Interrogatories (Nos. 174-186) and responses to OPC's Eleventh Request for Production of Documents (Nos. 133-145).

Thank you for your assistance in connection with this matter.

Sincerely,

V. Ponder

Virginia Ponder

VLP/ne
Attachment
cc: All parties of record (w/out attachment)

COM ___
AFD ___
APA ___
ECO ___
ENG 1 redacted copy
GCL ___
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for Rate Increase by Tampa Electric Company	DOCKET NO. 20240026-EI
In re: Petition for approval of 2023 Depreciation and Dismantlement Study, by Tampa Electric Company	DOCKET NO. 20230139-EI
In re: Petition to implement 2024 Generation Base Rate Adjustment provisions in Paragraph 4 of the 2021 Stipulation and Settlement Agreement, by Tampa Electric Company	DOCKET NO. 20230090-EI SERVED: May 23, 2024

REDACTED
TAMPA ELECTRIC COMPANY'S
ANSWERS TO OFFICE OF PUBLIC COUNSEL'S
TENTH SET OF INTERROGATORIES (NOS. 174-186)

Pursuant to Rule 106.206, Florida Administrative Code, and Florida Rule of Civil Procedure 1.350, Tampa Electric Company ("Tampa Electric" or "the company"), hereby answers Office of Public Counsel's Tenth Set for Interrogatories (Nos. 174-186), served May 3, 2024 ("OPC's Tenth ROG").

General Objections

1. Tampa Electric objects to each interrogatory in OPC's Tenth ROG ("Interrogatory") to the extent that it seeks information that is duplicative, not relevant to the subject matter of this docket, and is not reasonably calculated to lead to the discovery of admissible evidence.

2. Tampa Electric objects to each Interrogatory to the extent it is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of such Interrogatory. Tampa Electric will seek

clarification from OPC if an Interrogatory is not clear, but Tampa Electric will produce documents subject to, and without waiving, this objection.

3. Tampa Electric objects to each Interrogatory to the extent it requires Tampa Electric to produce information that is already in the public record before the Florida Public Service Commission ("FPSC" or the "Commission") or other public agency and available to OPC through normal procedures or is readily accessible through legal search engines.

4. Tampa Electric objects to each Interrogatory to the extent that it calls for data or information protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law. Tampa Electric will describe the nature of the privileged material, if any, in a privilege log that will accompany its responses.

5. Tampa Electric objects to producing paper copies on the grounds that doing so would be unduly burdensome. Tampa Electric has entered into an agreement with OPC, governing discovery production and responses, and will serve its answers to the Interrogatories and related responsive documents to OPC in electronic form via a SharePoint site to which OPC and its consultants has remote access.

6. Tampa Electric objects to each Set to the extent it requires the company to provide information that it believes is "proprietary confidential business information" as described in Section 366.093, Florida Statutes. Tampa Electric will provide such confidential information to OPC in a designated confidential portion of the SharePoint site described above and subject to a Motion for Temporary Protective Order, Notice of Intent to Request Confidential Classification, and/or Request for Confidential Classification, as appropriate.

7. Tampa Electric objects to each Interrogatory, instruction, or definition in that purports to expand Tampa Electric's obligations under applicable law.

8. Tampa Electric objects to each Interrogatory to the extent it requests Tampa Electric to prepare information in a particular format or create data or information that it otherwise does not possess as unduly burdensome and as purporting to expand Tampa Electric's obligations under applicable law.

9. Subject to Section 366.093(1), Florida Statutes, Tampa Electric objects to any definition or Interrogatory that requests documents from persons or entities who are not parties to this proceeding, that seek information from affiliates unrelated to transactions or cost allocations involving Tampa Electric, or that are not otherwise subject to discovery under applicable rules.

10. Tampa Electric objects to any Interrogatory requiring the company to provide additional information beyond that obtained through a reasonable and diligent search.

General Response

Subject to and without waiving its general objections, which are incorporated by reference in each of its specific answers, Tampa Electric provides its answers to OPC's Tenth ROG by posting its answers on the Tampa Electric Discovery SharePoint site established for this docket (the "SharePoint") and as specified in its specific answers. Tampa Electric will serve its answers to the Commission staff by hand delivering a USB containing its answers to the Commission Clerk's office, and for Staff's purposes, the term "USB" should be substituted for "SharePoint" in the specific answers shown below.

The company's specific answers will identify interrogatories that call for answers that contain (a) information for which the company asserts a legal privilege and/or (b) "proprietary confidential business information" as defined in Section 366.093, Florida Statutes.

An answer that contains information for which the company asserts a legal privilege will be identified in the privilege log attached as Exhibit A.

An answer that contains information the company asserts to be "proprietary confidential business information" will be provided in the Confidential portion of the SharePoint subject to a request for confidential classification, motion for temporary protective order and/or a non-disclosure agreement.

Specific Answers

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF INTERROGATORIES
INTERROGATORY NO. 174
BATES PAGE(S): 30602 - 30603
MAY 23, 2024

174. TECO Accounts Receivable from Affiliates Used in MMM Allocation Factor. One of the MMM allocator factor inputs is "Operating Assets less Cash". The Confidential response to OPC Production of Documents (POD) No. 7 provides TECO billings to affiliates, and these documents show significant amounts of Accounts Receivable balances due from affiliates. Please address the following:

a. Explain if the Accounts Receivable balances on TECO books (for amounts due from affiliate charges) is (or is not) included in the TECO "Operating Asset" balances used for calculating a portion of the MMM method (that is used to determine the allocation of costs from Emera to TECO), and explain why the TECO affiliate Accounts Receivable balances are included or excluded from the "Operating Asset" calculation.

b. Provide the Accounts Receivable balances from affiliates (for each affiliate) on TECO's books at December 31, 2021, 2022, and 2023, and show amounts by account number.

c. Explain if the Accounts Receivable balances from affiliates on TECO's books are offset by a debit to "Cash" when payment is received, or explain if a debit is not recorded to "Cash" when payment is received, but rather an entry is made to an affiliate transfer non-cash account (and identify this account and account number).

d. Explain why it is reasonable to include the Accounts Receivable from affiliates balance in the "Operating Asset" balance of the TECO MMM calculation (which could overstate Accounts Receivable), but why is not considered reasonable to reduce the Accounts Receivable balance by some other offsetting affiliate entry (which is a surrogate for the offsetting debit to "Cash") that is used to reduce the Accounts Receivable balance.

ANSWER:

In addition to the answer below, please see Tampa Electric's response to "OPC Clarification Questions for TECO TEAMs Call – May 16, 2024".

a. Tampa Electric Accounts Receivable from affiliates is included in the Tampa Electric "Operating Asset" balances used by Tampa Electric for calculating a portion of the MMM method to distribute certain costs to affiliates.

Tampa Electric Accounts Receivable from affiliates is also included in the Tampa Electric "Operating Asset" balances used for calculating a portion of the MMM method used by Emera to distribute certain costs to affiliates, including Tampa Electric.

It is reasonable to include the Accounts Receivable from affiliates balance in the "Operating Asset" balance of the TECO MMM calculation because these receivable balances, like any other receivable, are associated with the operations of the utility itself.

b. Please see Tampa Electric's answer to OPC's Second Set of Interrogatories, No. 69 (Bate Stamp page 18164) for the requested information.

c. When cash is received for payment on the Accounts Receivable balances, we book this as a debit to cash (FERC Account 131) and the offset is a credit to Accounts Receivable (FERC Account 146).

Prior to the intercompany invoices being created and sent out and prior to payments being applied, Tampa Electric nets the Affiliate Accounts Receivable (FERC account 146) and the Affiliate Accounts Payable (FERC account 234) ending balances. This is done during the end of the month closing process so that the result is either a net payable (in which case Tampa Electric issues a cash payment to the affiliate) or a net receivable (in which case Tampa Electric receives a cash payment from the affiliate).

d. It is reasonable to include the Accounts Receivable from affiliates balance in the "Operating Asset" balance of the TECO MMM calculation because these receivable balances, like any other receivable, are associated with the operations of the utility itself. Cash is not included in the "Operating Asset" balance of the TECO MMM calculation because cash is not included in retail regulated rate base.

175. TECO Dividends Paid to Emera or Other Affiliates. Please explain if TECO paid a dividend to Emera or any other affiliate for the calendar years 2021 to 2024 (and budgeted 2024 and 2025), and provide the related amount of the dividend by account number for each year, explain how the dividend amount is determined for each year, and explain how this reduction in cash balance impacts the calculation of Net Assets input of the MMM allocation factor for each of the years.

ANSWER:

In addition to the answer below, please see Tampa Electric's response to "OPC Clarification Questions for TECO TEAMs Call – May 16, 2024".

- Tampa Electric is providing dividend payment information for the period 2021 – 2025. Tampa Electric makes dividend payments quarterly. Each quarterly dividend is approved by the Tampa Electric Board of Directors.
    - The account numbers impacted are as follows:
        - Debit FERC Account 216 (Retained Earnings)
        - Credit FERC Account 238 (Dividends Declared)
- Tampa Electric made dividend payments to its parent company, TECO Energy, through the first quarter of 2024. Subsequent dividend payments will flow from Tampa Electric to TECO Holdings.
- Tampa Electric continues its decades-long procedure of paying dividends to its parent (TECO Energy/TECO Holdings) that is equal to 100 percent of Tampa Electric's net income.
    - This procedure allows for a clear line of sight related to equity infusions made by the parent to Tampa Electric.
- When Tampa Electric pays its parent the dividend, Tampa Electric transfers cash from the company's bank account to the parent bank account.
    - The account numbers impacted are as follows:
        - Debit FERC Account 238 (Dividends Declared)
        - Credit FERC Account 131 (Cash)
- Since Tampa Electric pays dividends to its parent company, there is no dividend payment or cash transaction between Tampa Electric and Emera.

- From a timing perspective, the Tampa Electric dividend, in any particular quarter, equals the net income earned by Tampa Electric in the prior quarter.
  - For example: On February 8th, 2024, Tampa Electric declared a dividend of $85 million which represented the total net income for Q4 2023 payable on February 15th, 2024. On February 15th, 2024, $85 million in cash was transferred from Tampa Electric's bank account to TECO Energy's bank account.

The chart below provides the dividend payments by Tampa Electric to its parent in 2021 through 2025. For 2024 and 2025, the amounts are the budgeted amounts included in this petition. The actual 2024 first quarter payment is described above.

Dividends Paid to Parent (in $ millions)

	2021	2022	2023	2024B	2025B
Q1	75,808,730	67,552,985	91,260,244	84,626,900	86,234,063
Q2	65,348,097	88,264,348	79,391,914	65,478,985	74,528,773
Q3	101,784,181	125,912,056	131,529,532	122,849,839	120,026,269
Q4	134,422,561	152,433,969	169,965,146	168,992,806	159,979,212
Total Dividends Paid	**377,363,569**	**434,163,358**	**472,146,836**	**441,948,530**	**440,768,317**

Cash is excluded from the calculation of Net Operating Assets, therefore dividends have no impact on the MMM allocation calculation.

176. "2023 Corp Shared Services Actual MMM calc" Excel Spreadsheet for MMM Method. TECO provided the noted Excel spreadsheet to OPC on April 29, 2024, providing examples of the MMM allocation factor calculation which uses December 31, 2022, MMM inputs for Total Revenues, Net Income, and Operating Assets. Please address the following:

a. Explain why "December 31, 2022" financial inputs for Total Revenues, Net Income, and Operating Assets are used for calculating the "2023 MMM" allocation factor, and explain why the MMM factor is calculated a year in arrears.

b. The TECO MMM calculation shows a reduction in Operating Assets related to the "Acquisition Adjustment." Explain if TECO Net Income has also been increased to remove the impact of amortization expense related to the Acquisition Adjustment on TECO books, and provide this Acquisition Adjustment amortization expense by account number for TECO (and all other affiliates impacted by this amortization) at December 31, 2021, 2022, and 2023. Otherwise, explain why the impact of the Acquisition Adjustment amortization expense should not be removed from Net Income for purposes of the Operating Assets MMM allocation factor.

ANSWER:

In addition to the answer below, please see Tampa Electric's response to "OPC Clarification Questions for TECO TEAMs Call – May 16, 2024".

a. The actual Tampa Electric MMM allocation factor for each year is calculated using prior year-end actual amounts. This method, which has been used for decades, facilitates the administrative efficiency of the process and facilitates consistency and predictability of the percentages. The company does not believe that the factor is year in arrears because (a) the year-end amounts exist at the beginning of the period, and (b) the costs to which the factor is applied are actual costs incurred in the current period.

b. Tampa Electric net income is not increased to remove the impact of amortization expense due to the impact from the amortization expense being immaterial to this calculation. In 2023, this expense was $237 thousand pre-tax (a net income impact of $178 thousand). Removing this expense to increase net income does not change the allocation percentages.

177. "OPC IRR 95b - Allocation Factor Percentages" Factors for Allocating Costs from TECO to Affiliates. TECO provided the above noted Excel spreadsheets to OPC on or about April 27, 2024, showing sample calculations of various allocation factors (used for allocating costs from TECO to affiliates/allocable costs), including HR Benefits Admin., HR Employees Relations, etc. Please address the following:

a. Regarding the TECO "HR Benefits Admin." allocation factor percentages, explain why the allocation factor was relatively stable in 2020 and 2021 at about 66.61%, increased in 2022 to 68.88%, increased in 2023 by a greater amount to 71.51%, and then increased significantly for Budget 2024/2025 purposes to 71.97%. Provide all calculations to support the reasons for the increase in allocation factors for 2023 and the 2024/2025 Budget.

b. Regarding (a) above, explain the corresponding reduction in the NMG allocation factor from 15.17% in 2022 to $12.57% for 2024/2025 Budget, and provide all calculations to support the reasons.

c. Regarding the TECO "HR Employee Relations" allocation factor percentages, explain why the allocation factor was relatively stable in 2020 and 2021 at about 76.70% to 74.19%, increased significantly in 2022 to 95.40%, increased again in 2023 to a factor of 97.81%, and then increased for Budget 2024/2025 purposes to 97.75%. Provide all calculations to support the reasons for the increase in allocation factors from 2021 through 2024/2025 Budget.

d. Per the NMG "HR Benefits Admin" factor and the "HR Employee Relations" factor, explain why HR Benefits Admin. allocates about 13% to 15% of these costs to NMG but "HR Employee Relations" allocates significantly less costs using a reduced factor of 1% to 2%, explain why HR-related functions would not be similar in their respective allocation factors – and explain why different allocation inputs are used for these HR-related functions.

e. Regarding the TECO "Procurement" allocation factor percentages, explain why the allocation factor was relatively stable from 2020 to 2023 at about 75.41% to 74.70%, but increased significantly in 2022 to 80.96%, and then significantly increased for Budget 2024/2025 purposes to 85.41%. Provide all calculations to support the reasons for the increase in allocation factors from 2022 through 2024/2025 Budget.

f. Explain why this Excel spreadsheet does not show allocation factors used in allocating/assigning TECO costs to affiliates NSP, TECO Energy (which receives a similar allocation of costs as TECO Partners in 2022 and 2023), TECO Services, Emera Technologies, and SeaCoast. Provide the related allocation factors for these affiliates in a similar format and explain the reasons for changes in allocation factors from 2020 to 2024/2025 Budget.

g. For the affiliates noted in (f) above, explain why the Excel spreadsheet does not show any allocation factors for the Corporate Overhead, IT, HR, Administrative Services and other function costs from 2020 to 2024/2025 Budget – and provide these related allocation factors.

h. Regarding the "2024/2025 Budget" allocation factors for each function at this Excel spreadsheet, explain if TECO budgeted expenses for account 923 were determined in this rate case by using the related 2024/2025 Budget allocation factors provided in this Excel spreadsheet.

ANSWER:

In addition to the answer below, please see Tampa Electric's response to "OPC Clarification Questions for TECO TEAMs Call – May 16, 2024".

a. As described in the TECO Cost Allocation Manual ("CAM"), provided in the company's response to OPC's Second Request for Production of Documents, No. 34, the costs following the HR Benefits Admin assessment are charged to affiliates that benefit from described services using a statistical shared services assessment methodology. The support for each affiliate could change year over year, as necessary. The requested detailed calculations have been provided in OPC's Fifth Request for Production of Documents, No. 71. The change in the HR Benefits Admin allocation factor from 2020 to 2021 was insignificant as the employee count decreased at Tampa Electric with offsets related to changes in the support provided to operating companies. The increase from 66.61 percent in 2021 to 68.88 percent in 2022 was caused by a reduction in services provided to Peoples Gas Services ("PGS"), specifically in the Administration, Healthcare and Compensation/HRIS areas. The increase in the allocation factor from 68.88 percent in 2022 to 71.51 percent in 2023 and 71.97 percent in 2024/2025 is related to active employee count at each affiliate. In the 2022 assessment calculation, Tampa Electric's active employee count comprised 60 percent of the total TECO employee count versus 64 percent in 2023 and 63 percent budgeted in the 2024/2025 assessment, supporting the increase in Tampa Electric's allocation percentage in those years with slight changes to the support provided to operating companies in 2024/2025.

b. Please see Tampa Electric answer to OPC's Sixth Set of Interrogatories, No. 96(e) and OPC's Fifth Request for Production of Documents, No. 71 for the related calculations. The assessment methodology used to calculate this percentage is based off of active employee count at each affiliate. In the 2022 assessment calculation, New Mexico Gas Company's ("NMGC") active employee count comprised 20 percent of the total TECO employee count versus 17 percent budgeted in 2024/2025.

c. As described in the TECO CAM, provided in the company's response to OPC's Second Request for Production of Documents, No. 34, the costs following the HR Employee Relations assessment are charged to affiliates that benefit from described services using a statistical shared services assessment methodology. The support for each affiliate could change year over year as necessary. The requested detailed calculations have been provided in the company's response to OPC's Fifth Request for Production of Documents, No. 71. The decrease in the allocation factor from 76.70 percent in 2020 to 74.19 percent in 2021 was due to a decrease in Tampa Electric employee count and an increase in PGS employee count. The increase from 74.19 percent in 2021 to 95.40 percent in 2022 was caused by reduced services provided to PGS, specifically in the Labor/Employee Relations, Training & Development and Recruitment & Staffing areas. The increase from 95.40 percent in 2022 to 97.81 percent in 2023 and 97.75 percent in 2024/2025 was driven by active employee count. In the 2022 assessment calculation, Tampa Electric's active employee count comprised

60 percent of the total TECO employee count versus 64 percent in 2023 and 63 percent budgeted in the 2024/2025 assessment supporting the increase in Tampa Electric's allocation percentage in those years. The predominant cause of the changes above was the establishment of separate Labor/Employee Relations, Training & Development and Recruitment & Staffing functional groups at PGS.

d. There are two primary reasons that these factors are different: (1) the factors reflect different support profiles and (2) the costs incurred at Tampa Electric are impacted by the existence of HR functional groups in affiliate companies, which reduces the services required to be provided by Tampa Electric.

(1) "HR Benefits Admin" relates to the administration of benefit programs provided to employees at various affiliated companies. "HR Employee Relations" relates to the remainder of human resources functions conducted for various affiliated companies. These two separate Human Resources-related allocations vary as the services provided vary. The TECO Energy CAM, provided in the company's response to OPC's Second Request for Production of Documents, No. 34 describes the different services provided by Tampa Electric.

(2) The factor for NMGC has been impacted by the existence of separate Labor/Employee Relations, Training & Development, Recruitment & Staffing, and other HR functional groups at NMGC.

e. As described in the TECO CAM, provided in the company's response to OPC's Second Request for Production of Documents, No. 34, the costs following the Procurement assessment allocate costs proportionately based on the percentage of total procurement purchase order spend for each company as a percent of total procurement purchase order spend for all companies that receive this service. The support for each affiliate could change year over year as PO spend and team member support changes. The requested detailed calculation for 2022 has been provided the company's response to OPC's Fifth Request for Production of Documents, No. 71. Additionally, please see the company's response to OPC's Eleventh Request for Production of Documents, No. 136 for 2023-2024 calculations.

The increase from 2022 to 2023 and 2024/2025 was related to lower support provided to PGS. In addition to this, as mentioned in Christian Richard's testimony in the PGS rate case, PGS established its own supply chain management group in 2023 which resulted in a higher allocation to Tampa Electric. In 2023, the Director of Procurement no longer provided services to PGS and in 2024/2025, PGS transitioned to their own procurement team.

f. The excel spreadsheet referenced only encompasses the Tampa Electric Shared Service departments and their allocation factor percentages to affiliates that they service. As described in the TECO CAM, provided in the company's response to OPC's Second Request for Production of Documents, No '34, the costs following these assessments are charged to affiliates that benefit from described services using statistical shared services assessment methodologies. NSP, TECO Energy, TECO Services, Emera Technologies, and SeaCoast do not receive these services.

g. The functions that flow through the Corporate Overhead, IT, HR, and Admin Services assessments do not service the companies stated. NSP, TECO Energy, TECO Services, Emera Technologies, and SeaCoast do not receive these services.

h. The budgeted expenses for FERC account 923 in this rate case were determined using the same methodology used for budgeting all O&M expense as described in witness Chronister's pre-filed testimony volume II (page 16 – 18). The allocation factors reflected on the Excel spreadsheet impact the 2024/2025 budget amounts through the budgeting of credits to FERC account 922 for the portion that is allocated to affiliates.

178. Headcount Allocation Factors for Allocating/Assigning Costs from TECO to Affiliates. TECO provided the above noted Excel spreadsheet to OPC on or about April 29, 2024, in the 11th email that day. The table refers to "2023 Headcounts with NMGC", but shows headcount data using "2021" headcount. Please address the following:

a. Explain why 2021 headcounts for NMG, TECO, TEC SS, PGS, and TECO Partners are used to determine 2023 Headcount allocation factors for each affiliate in this rate case.

b. Although affiliate headcount data and related allocation factors were previously requested in OPC Interrogatory (INT) No. 62 and POD No. 38 and INT No. 68, but not provided, provide all headcounts and headcount factors for all affiliates (including all affiliates to which Emera allocates costs) as requested in these two prior INTs.

ANSWER:

In addition to the answer below, please see Tampa Electric's response to "OPC Clarification Questions for TECO TEAMs Call – May 16, 2024".

a. The correct 2023 headcounts were used to determine the 2024 and 2025 budgeted allocation factors for each affiliate. The Excel spreadsheet properly reflected the 2023 headcount data, but a typographical error resulted in the title incorrectly describing it as 2021 data.

b. Please see the company's Supplemental Response to OPC's Second Set of Interrogatories, Nos. 62 and 68, served on May 6, 2024, and its Second Supplemental Response to OPC's Request for Production, No. 37 (BS 19169) which includes the requested headcount information.

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TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF INTERROGATORIES
INTERROGATORY NO. 179
BATES PAGE(S): 30614 - 30619
MAY 23, 2024

179. 2021 -2023 Emera Allocations to TECO (and Other Affiliates) Do Not Reconcile to FERC Form 1. TECO's Confidential response to OPC's Second Set of PODs No. 37 includes four Excel documents (BS 16844, 16845, 16846, and 16847) that show the amount of Shared Services expenses by Function (and Emera Total Corporate Overhead expense) allocated from Emera/Parent to all affiliates for calendar years 2021, 2022, 2023, and a summary 2021-2023 (TECO's response to related OPC's Second set of INTs No. 61 is not deemed Confidential). Allocations to TECO – POD No. 37 shows total Emera Shared Services/Corporate Overheads allocated to TECO of [redacted] (including Corporate Overhead of [redacted]) for 2023, [redacted] (including Corporate Overhead of [redacted]) for 2022, and [redacted] (including Corporate Overhead of [redacted]) for 2021, but this does not reconcile to allocations from Emera to TECO at the FERC Form 1 diversification reports (that are not confidential) which show related allocations (that exclude gas purchases) from Emera to TECO of [redacted] ([redacted] of non-labor Corporate Support Services) for 2023, [redacted] ([redacted] of non-labor Corporate Support Services) for 2022. Please address the following regarding the allocations from Emera to TECO and affiliates for 2023:

a. Per the above information, explain and reconcile the allocated costs from Emera to TECO shown at the POD No. 37 Excel document to the similar information shown at FERC Form 1 diversification reports for calendar years 2021, 2022, and 2023, and provide all supporting and calculations, and show labor and non-labor allocated amounts separately by Function (exclude or separately identify all gas purchase amounts in the transactions). Explain which document (POD No. 37 or FERC Form 1 diversification reports) is correct regarding allocated amounts from Emera to TECO for calendar years 2021, 2022, and 2023, and explain the purpose of the other document if it does not show correct allocated amounts from Emera to TECO.

b. If Emera allocations to TECO at POD No. 37 are not correct for years 2021, 2022, and 2023, then provide a corrected POD No. 37 Excel spreadsheet in the same format showing the correct allocated amounts by Function from Emera to TECO and all affiliates for years 2021, 2022, and 2023 (and also provide the correct total amount of Emera expenses allocated to affiliates by Function, per the first column of POD No. 37).

c. Regarding (a) and (b) above, compare the POD No. 37 information showing Emera allocations to PGS and NMG for 2021, 2022, and 2023 to the similar information in the FERC Form 1 affiliate diversification reports for PGS and NMG, and explain and reconcile the differences. Explain which document shows the correct allocated amounts from Emera for years 2021, 2022, and 2023 and explain the purpose of the other document if it does not show correct allocated amounts from Emera.

d. Per (a) above, please reconcile and identify the correct amount of allocated expenses from Emera to TECO for years 2021, 2022, and 2023, and identify the related amounts recorded on TECO's books by expense account number (and account description).

ANSWER:

In addition to the answer below, please see Tampa Electric's response to "OPC Clarification Questions for TECO TEAMs Call – May 16, 2024".

a. The Emera Allocations listed in POD No. 37 Excel files for 2021, 2022, and 2023 are all contained in the charges reported in the Tampa Electric FERC Form 1 Diversification Pages for those years – on the Page 457C line item titled "Emera, Inc. - Corporate Support Services & Monthly Allocations". The dollars on POD No. 37 will not directly match the amounts on FERC Form 1 Diversification Pages for the following two reasons:

   1. The amounts provided in Tampa Electric's response to OPC's Second Request for Production of Documents are in Canadian (CAD) currency. Tampa Electric converts all CAD currency to USD, and then records the charges in USD. Our FERC Form 1 is filed in USD as well. Also when Tampa Electric performs the conversion, we use the average conversion rate from the current month instead of an average annual conversion rate.
   2. Tampa Electric's response to OPC's Second Request for Production of Documents No. 37 reflects costs that Emera describes as monthly allocations. Emera describes costs related to Emera Corporate

Support Services, Pension Function, and External Financial Reporting & Compliance as direct costs. The executive compensation contained in the Emera Corporate Support Services costs are included in OPC's First Set of Interrogatories, No. 20. Since Emera does not describe Emera Corporate Support Services, Pension Function, and External Financial Reporting & Compliance costs as allocations.

To delineate the total Emera costs and to reconcile those Emera costs to the amounts presented in the FERC Form 1 Diversification Pages, the company is providing the chart below.

		2023	2022	2021	2020
1	**Reconciliation of CAD amounts between Emera schedules and Tampa Electric schedules**				
2					
3	**Emera Charges to Tampa Electric:**	**2023**	**2022**	**2021**	**2020**
4	Emera Allocations - SS (called "TSI Corp Support Allocation") - POD 37 (CAD)	1,158,627.66	1,757,750.68	2,074,586.29	1,062,361.38
5	Emera Allocations - TEC Non-SS (called "TEC Corp Support Allocation") - POD 37 (CAD)	4,132,878.19	2,995,235.26	2,751,315.77	2,664,620.12
6		**5,291,505.85**	**4,752,985.94**	**4,825,902.06**	**3,726,981.50**
7	Corporate Support Services - Direct Bill per Emera:				
8	Emera Corporate Services (called "TSI recoveries") - MMM	9,562,409.64	9,089,255.36	9,243,709.56	8,207,650.68
9	Pension Function (Labor, overhead and actuarial services)	233,656.84	207,890.08	151,678.00	129,208.11
10	External Financial Reporting & Compliance (Labor)	5,822.78	7,603.07	6,280.06	10,005.15
11		**9,801,889.26**	**9,304,748.51**	**9,401,667.62**	**8,346,863.94**
12					
13	Total Charges from Emera to Tampa Electric, Excluding Seconded Labor (CAD)	**15,093,395.11**	**14,057,734.45**	**14,227,569.68**	**12,073,845.44**
14					
15	**Tampa Electric Charges from Emera:**				
16	Tampa Electric Shared Service (CAD)	1,680,001.50	1,816,203.16	2,278,218.29	1,518,719.04
17	Tampa Electric (CAD)	3,517,384.53	2,936,782.40	2,641,083.93	1,956,334.04
18		**5,197,386.03**	**4,752,985.56**	**4,919,302.22**	**3,475,053.08**
19	Corporate Support Services - Direct Bill per Emera:				
20	Emera Corporate Services (called "TSI recoveries") - MMM	9,562,409.64	9,089,255.36	9,243,709.56	8,207,650.68
21	Pension Function (Labor, overhead and actuarial services)	233,656.84	207,890.08	151,678.00	129,208.11
22	External Financial Reporting & Compliance (Labor)	5,822.78	7,603.07	6,280.06	10,005.15
23		**9,801,889.26**	**9,304,748.51**	**9,401,667.62**	**8,346,863.94**
24					
25	Total Charges to Tampa Electric from Emera, Excluding Seconded Labor (CAD)	**14,999,275.29**	**14,057,734.07**	**14,320,969.84**	**11,821,917.02**
26					
27	Closeout Timing Difference (CAD)	94,119.82	0.38	(93,400.16)	251,928.42
28					
29					
30	**Reconciliation to amounts shown on FERC Form 1 Diversification Pages**				
31		**2023**	**2022**	**2021**	**2020**
32	Total Charges to Tampa Electric from Emera, Excluding Seconded Labor (CAD) - Line 25	14,999,275.29	14,057,734.07	14,320,969.84	11,821,917.02
33	Full-Year Average Currency Conversion Rate	1.3495	1.3017	1.2537	1.3412
34	Total Charges to Tampa Electric from Emera, Excluding Seconded Labor (Converted to USD)	11,114,690.84	10,799,519.14	11,422,963.90	8,814,432.61
35					
36	Impact of Accruals/Reversals (USD)	(16,404.67)	-	443,953.98	-
37					
38	Impact of using year-end average rate vs actual monthly conversion rate used (USD)	19,534.83	22,039.86	51,114.12	3,923.39
39					
40	FERC Form 1, Page 457 - Emera, Inc. : Corporate Support Services & Monthly Allocations (USD)	11,117,821	10,821,559	11,918,032	8,818,356

The chart above is provided in Excel format with formulas intact in the company's response to OPC's Eleventh Request for Production of Documents No. 138 ("POD_11_138").

b. The data provided in Tampa Electric's response to OPC's Second Request for Production of Documents No. 37 is correct. As discussed in the answer to (a) above, there are charges that Emera does not describe as allocated costs but rather describes as direct costs. To delineate the total Emera costs and to reconcile those Emera costs to the amounts presented in the Tampa Electric FERC Form 1 Diversification Pages, the company is providing the chart in the answer to (a) above. In addition, the company is also providing – for the same purpose – the chart in Tampa Electric's Eleventh Request for Production of Documents, No. 140.

c. In addition to its general objections, which are incorporated herein by reference, Tampa Electric objects to this request on grounds that it is overbroad and unduly burdensome to the extent it requests the company to independently reconcile information in public filings made by PGS and NMG for which Tampa Electric has no involvement.

Notwithstanding the objection above, the company is providing the following clarification: As discussed in the answer to (a) above, the Emera Allocations listed in Tampa Electric's response to OPC's Second Request for Production of Documents No. 37 Excel files for 2021, 2022, and 2023 are all contained in charges that would be reported by US affiliates in regulatory filings. The dollars will not directly match the amounts on regulatory filings for the following two reasons:

1. The amounts provided in Tampa Electric's response to OPC's Second Request for Production of Documents are in Canadian (CAD) currency. US affiliates convert all CAD currency to USD, and then record the charges in USD. US regulatory filings are filed in USD as well. Also, when an affiliate performs a conversion, they would use the average conversion rate from the current month instead of an average annual conversion rate.

2. Tampa Electric's response to OPC's Second Request for Production of Documents No. 37 reflects costs that Emera describes as monthly allocations. Emera describes costs related to Emera Corporate Support Services, Pension Function, and External Financial Reporting & Compliance as direct costs. Since Emera does not describe Emera Corporate Support Services, Pension Function, and External Financial Reporting & Compliance costs as allocations, these were not reflected.

   The data provided in Tampa Electric's response to OPC's Second Request for Production of Documents, No. 37 is correct. As discussed in the answer to (a) above, there are charges that Emera does not describe as allocated costs but rather describes as direct costs. To delineate the total Emera costs and to reconcile those Emera costs to the amounts that would be presented in regulatory filings, the company is providing the chart in response to OPC's Eleventh Request for Production of Documents, No 140.

d. Please see the answers to supbarts (a) and (b) above. Additionally, please see Tampa Electric's response to OPC's Eleventh Request for Production of Documents, Nos. 138 and 140 for files titled OPC Summary – POD 138.xlsx titled OPC POD_140_Emera Charges.xlsx, respectively. as Also, please see Tampa Electric's response to OPC's Ninth Request for Production of Documents, NO. 118 titled OPC_Affiliate_Purchases by FERC.xlsx.

REDACTED

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF INTERROGATORIES
INTERROGATORY NO. 180
BATES PAGE(S): 30620 - 30621
MAY 23, 2024

180. Confidential – 2021 -2023 Other Affiliate Allocations to TECO in POD No. 37 Format. TECO's Confidential response to OPC's POD No. 37 includes four Excel documents (BS 16844, 16845, 16846 and 16847) that show the amount of Shared Services expenses by Function (and Emera Total Corporate Overhead expense) allocated from Emera/Parent to TECO and all affiliates for calendar years 2021, 2022, 2023. In addition, TECO's FERC Form 1 affiliate diversification reports show allocations (excluding gas purchases) from various other affiliates to TECO for years 2021, 2022, and 2023 (such as 2023 allocations from PGS to TECO of [redacted] allocations from NMG to TECO of [redacted], and various other affiliate allocations to TECO of [redacted]). Please address the following:

a. Explain if a similar document/spreadsheet as POD No. 37 (which shows allocations by Function from Emera to TECO for years 2021, 2022, and 2023) that can be provided to show the expenses allocated (excluding gas purchases) from all other primary affiliates to TECO and all other affiliates (and which would provide similar information as TECO's FERC Form 1 affiliate diversification reports, except besides showing just the amount of each affiliates allocations to TECO by Function, it would show each affiliates allocations to all other affiliates also). This type of document/spreadsheet would only need to show the amount of expenses by Function allocated to TECO (and other affiliates) from PGS, NMG, Nova Scotia Power (and from any other affiliate that allocates $250,000 or more to TECO in any single year 2021, 2022, and 2023).

b. Per (a) above, if the information can be provided, please reconcile and identify the correct amount of allocated expenses from each affiliate to TECO for years 2021, 2022, and 2023, and identify the related amounts recorded on TECO's books by expense account number (and account description).

ANSWER:

In addition to the answer below, please see Tampa Electric's response to "OPC Clarification Questions for TECO TEAMs Call – May 16, 2024".

a. The amounts listed in the question above are not allocations from the affiliates to Tampa Electric. The $2,331,590 from PGS and the $173,855 from NMGC are direct charges from those affiliates to Tampa Electric. The PGS amount pertains to Labor Services and Property Sublease charged to Tampa Electric. The NMGC amount pertains to Labor Services and IT Charges. The remaining $130,419 mentioned in the question above are also direct charges for Labor Services to Tampa Electric from TECO Partners Inc, Nova Scotia Power, Emera Caribbean Holdings Ltd., and Emera Caribbean Inc.

Please see Tampa Electric's response to OPC's Ninth Request for Production of Documents, NO. 118 for a file titled OPC_Affiliate_Purchases by FERC.xlsx.

b. Please see the company's answer to subpart(a), above.

REDACTED

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF
INTERROGATORIES
INTERROGATORY NO. 181
BATES PAGE(S): 30622 - 30627
MAY 23, 2024

181. Explain Changes in Emera Allocations. TECO's Confidential response to OPC's POD No. 37 includes three Excel documents (BS 16844, 16845, 16846) that show the amount of Shared Services expenses by Function (including Emera Total Corporate Overhead expense) allocated from Emera/Parent to all affiliates for calendar years 2021, 2022, 2023. The OPC table below summarizes allocations from Emera to the largest affiliates for each of the years 2021 to 2023, address the following based on this table.

CONFIDENTIAL - Source POD 2-37 Excel spreadsheets

	A	B	C	D	E	F	G
		2023	2022	2021	2023	2022	2021
	Emera & Affiliates	Amount	Amount	Amount	Percent	Percent	Percent
1	Emera Allocated Below	[redacted]					
2	Nova Scotia Power	$ 9,281,239	$ 8,970,310	$ 8,620,688	34%	35%	34%
3	Emera Holdo	[redacted]			18%	19%	20%
4	TECO	$ 4,132,878	$ 2,995,235	$ 2,751,316	15%	12%	11%
5	Emera Energy Trading	[redacted]			10%	11%	10%
6	PGS	$ 1,334,044	$ 889,961	$ 597,285	5%	4%	2%
7	NMG	$ 1,067,629	$ 886,629	$ 913,344	4%	3%	4%
8	TSI	$ 1,158,626	$ 1,757,751	$ 2,074,586	4%	7%	8%
9	Barbados P&L	$ 708,164	$ 850,685	$ 904,458	3%	3%	4%
10	Grand Bahamas	$ 409,542	$ 247,350	$ 639,224	2%	1%	2%
11	Subtotal Above Affiliates	$ 25,789,737	$ 24,041,201	$ 24,203,273	95%	95%	94%
12	Other Affiliates	$ 1,346,767	$ 1,345,392	$ 1,446,152	5%	5%	6%
13	Total Allocated	[redacted]			100%	100%	100%

a. Explain why the total amount of Emera Shared Service expenses allocated to affiliates was relatively flat for 2021 [redacted] and 2022 [redacted] and then increased by [redacted] (6.9%) from 2022 to 2023, and explain the expense increases by Function/Cost Center (Audit Services, Corporate Insurance, Human Resources, etc.) and by type of expense (payroll, outside services, rent, etc.). Provide all supporting calculations.

b. Explain why total Emera Shared Service expenses allocated to TECO increased from 11% in 2021 to 15% in 2023, and was the single largest increase in dollar and percent among all affiliates from 2021 to 2023.

Explain the reason for the allocated expense increases by Function/Cost Center (Audit Services, Corporate Insurance, Human Resources, etc.) and by type of expense (payroll, outside services, rent, etc.), including reasons related to changes in allocation methods, significant changes in allocation factor inputs using the same methods, changes in services being provided to TECO, new types of costs being incurred and allocated, and other reasons. Provide all supporting calculations, including an explanation why other affiliates did not experience similar percent increases in allocated expenses.

c. Explain why total Emera Shared Service expenses allocated to PGS increased from 2% in 2021 to 5% in 2023 and was one of the largest increase in dollar and percent among all affiliates from 2021 to 2023. Explain the reason for the allocated expense increases by Function/Cost Center (Audit Services, Corporate Insurance, Human Resources, etc.) and by type of expense (payroll, outside services, rent, etc.), including reasons related to spin-off of gas operations, changes in allocation methods, significant changes in allocation factor inputs using the same methods, changes in services being provided to PGS, new types of costs being incurred and allocated, and other reasons. Provide all supporting calculations, including an explanation why other affiliates did not experience similar percent increases in allocated expenses.

d. Explain why total Emera Shared Service expenses allocated to TSI decreased from 8% in 2021 to 4% in 2023, and was the single largest decrease in dollar and percent among all affiliates from 2021 to 2023. Explain the reason for the allocated expense decreases by Function/Cost Center (Audit Services, Corporate Insurance, Human Resources, etc.) and by type of expense (payroll, outside services, rent, etc.), including reasons related to changes in allocation methods, significant changes in allocation factor inputs using the same methods, changes in services being provided to TSI, new types of costs being incurred and allocated, and other reasons. Provide all supporting calculations, including an explanation why other affiliates did not experience similar percent decreases in allocated expenses.

e. Explain why total Emera Shared Service expenses allocated to Emera Holdco decreased from 20% in 2021 to 18% in 2023, and was one of the larger decreases in dollar and percent among all affiliates from 2021 to 2023. Explain the reason for the allocated expense decreases by Function/Cost Center (Audit Services, Corporate Insurance, Human Resources, etc.) and by type of expense (payroll, outside services, rent, etc.), including reasons related to changes in allocation methods, significant changes in allocation factor inputs using the same methods, changes in services being provided to Emera Holdco, new types of costs being incurred and allocated, and other reasons. Provide all supporting calculations, including an explanation why other affiliates did not experience similar percent decreases in allocated expenses.

f. Explain why total Emera Shared Service expenses allocated to Nova Scotia Power, Emera Trading Company, Barbados P&L, Grand Bahamas, and NMG remained relatively flat from 2021 to 2023. Explain the reason for allocated expenses remaining flat by Function/Cost Center (Audit Services, Corporate Insurance, Human Resources, etc.) and by type of expense (payroll, outside services, rent, etc.), including reasons related to changes in allocation methods, significant changes in allocation factor inputs using the same methods, changes in services being provided to TSI, new types of costs being incurred and allocated, and other reasons. Provide all supporting calculations, including an explanation why other affiliates did not experience similar relatively flat changes in allocated expenses.

g. Regarding (a) to (f) above, explain if the trend showing increasing, decreasing, or relatively flat changes in allocated expenses from 2021 to 2023 for each affiliate identified above is a trend that will continue for 2024 and 2025, and provide all supporting calculations including the specific budgeted/projected expenses allocated from Emera to each affiliate in the table above for years 2024 and 2025.

ANSWER:

In addition to the answer below, please see Tampa Electric's response to "OPC Clarification Questions for TECO TEAMs Call – May 16, 2024".

To provide clarity and a better understanding of the answers below, please see the chart provided in OPC POD No. 140.

a. 2023's total allocations included costs for the new Business Transformation group (primarily payroll and outside service expense for HR technology solutions and digital advancements), project costs for technology upgrades in the Treasury group (outside service expense), and succession planning costs in Corporate Secretary that were not required in previous years (payroll expense).

b. The TECO change of 4 percent for a total of $1.4 million CAD is the single largest increase on this chart. From 2021 to 2023, TECO's total headcount increased relative to most other affiliates, and as a result they were allocated a higher proportion of costs for shared services allocated on that statistical allocator. In addition, TECO's computer asset count increased significantly, while many other affiliates had a reduction in their computer asset count – increasing costs allocated on that statistical allocator to TECO. Please see Tampa Electric's answer to OPC's Second Set of Interrogatories ,No. 62 for these changes. Lastly, the Audit Services group (allocated on the Work Plan or Hours Worked metric) performed more work for TECO in 2023 than in prior years due to an increase in engagements and vacancies on the US team.

   See the offsetting amount of $916K CAD shown on the TSI section in the answer to (d). The change here in answer (b) and the change in answer (d) below should be considered in a combined fashion, as depicted in the chart provided in the company's response to OPC's Eleventh Request for Production of Documents, No. 140. Finally, it should be noted that the USD amount budgeted by Tampa Electric for Emera charges for the test year 2025 are lower than the equivalent amount for 2023, as depicted on line 19.

c. The PGS change of 3 percent for a total of $737k CAD was one of the largest increases on the chart. PGS had a significant increase over this time period in both the headcount and computer count, relative to other affiliates, driving increased costs for functional groups that are allocated on these statistical allocators. In addition, the Treasury group completed significant work for PGS in 2023 related to the reorganization of that entity that was not required in previous years.

d. The TSI change of -4 percent for a total of ($916K) CAD was the single largest decrease on the chart. Since the 2020 movement of employees from TECO Services Inc. to Tampa Electric Shared Services, the TSI designation has been used to show the costs assigned to the Tampa Electric shared service group and further allocated from Tampa Electric to the affiliates. For 2023's allocations, TECO requested that Emera no longer allocate costs via shared service (shown as TSI) for further reallocation under the Tampa Electric MMM, and Emera began directly charging each of Tampa Electric, PGS and NMGC.

   See offsetting amount of $1.4 million CAD shown on the TECO section in the answer to (b) and $737K CAD shown on the PGS section in the answer to (c). The change here in answer (d) and the change in answer (b) above should be considered in a combined fashion, as depicted in the chart provided in response to OPC's Eleventh Request for Production of Documents, No 140. Finally, it should be noted that the USD amount budgeted by Tampa Electric for Emera charges for the test year 2025 are lower than the equivalent amount for 2023, as depicted on line 19.

e. The Emera Holdco change of -2 percent for a total of ($150K) CAD was one of the larger decreases on the chart. The dollar value of this change from 2021 to 2023 in Emera HoldCo is $29K CAD and is comprised of many offsetting increases and decreases across all functional groups, as well as changes in statistical allocators. These fluctuations would be considered ordinary year over year as business needs and statistical allocator support changes.

f. The percentages for the other companies reflected on this chart stayed relatively flat with an increase for all affiliates totaling $435K. As detailed in subparts (b) and (c) above, PGS and Tampa Electric had the most significant increases in headcount and computer count compared to other affiliates over this time period. Where the listed affiliates did not have significant swings in statistical allocators, their costs remained y flat for the functional groups allocating on these metrics (the majority of shared service groups). While the increased allocations to PGS and Tampa Electric would result in an offsetting decrease across the remaining affiliates, it would be evenly spread over all entities and thus relatively small. Offsetting those savings are increased costs year-over-year and new Business Transformation costs.

g. The trends in the changes in allocated expenses for each affiliate behave in a variety of directions for the years 2024 and 2025. To provide a detailed, comprehensive answer to this question, the company has provided the chart in the company's response to OPC's Eleventh Request for Production of Documents, No. 140. It should be noted that the USD amount budgeted by Tampa Electric for Emera charges for the test year 2025 are lower than the equivalent amount for 2023, as depicted on line 19.

182. Reasons for Allocation Treatment of Corporate Overheads and Remaining Shared Service Costs. Please address the following regarding TECO's Confidential response to OPC's POD No. 37 Excel document "(BS 16846) Emera Affiliate Allocations – 2023 Shared Services expenses of [redacted] consisting of Total Corporate Overhead expenses of [redacted] and remaining Shared Service expenses of [redacted]. by Function.

a. Explain why Nova Scotia Power (NSP) and Emera Holdco receive a proportionately greater percent allocation of Emera's total Corporate Overhead expense (by Function) of [redacted] whereas most other affiliates receive a proportionately lesser percent allocation of these expenses. Identify those factors that cause a greater percent allocation of Emera's Corporate Overhead expense to NSP and Emera Holdco (compared to lesser amounts allocated to remaining affiliates) and provide all supporting calculations.

b. Explain why most other affiliates (such as TECO, PGS, NMG, etc.) receive a proportionately greater percent allocation of Emera's remaining Shared Service Costs (by Function) of [redacted] whereas NSP and Emera Holdco receive a proportionately lesser percent allocation of these expenses. Identify those factors that cause a greater percent allocation of remaining Shared Service Costs to other affiliates (compared to lesser amounts allocated to NSP and Emera Holdco) and provide all supporting calculations.

ANSWER:

In addition to the answer below, please see Tampa Electric's response to "OPC Clarification Questions for TECO TEAMs Call – May 16, 2024".

a. Overhead is calculated on a set rate for each hour worked by an Emera shared service employee. For each Shared Service group, a total for all employees' labor hours is determined and allocated out consistent with gross costs for the group (i.e., on the same statistical allocator). As a result, the affiliates who receive the most shared service allocations also receive the most allocated overhead.

b. Each functional group considered a Shared Service is required to determine the most appropriate statistical allocator for the services they perform – as such each group's allocations will differ to best align with the service they deliver. One key cost that Emera would not receive due to the nature of the charges is the Board Allocation, please see the company's answer to Interrogatory, No. 185, below, for detail on why Emera does not receive allocations for these costs.

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TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF INTERROGATORIES
INTERROGATORY NO. 183
BATES PAGE(S): 30630 - 30632
MAY 23, 2024

183. Corporate Secretary – Annual General Meeting Costs Allocated from Emera to TECO and Affiliates. Please refer to TECO's Confidential response to OPC's POD No. 37 Excel document "(BS 16846) Emera Affiliate Allocations – Annual Summary 2023_Highlighted" which shows total Emera 2023 Shared Services expenses by Function of [redacted] allocated to TECO and various affiliates, along with the related current November 30, 2023, NSP Cost Allocation Manual (CAM) that addresses how various Shared Services/Corporate Overhead Costs are allocated from Emera to TECO and affiliates. The 2023 Function "Corporate Secretary – Annual General Meeting" shows total Emera expenses of [redacted] are allocated equally to only the three affiliates of NSP, Emera Holdco, and TECO in the amount of [redacted] each, with no allocation of these expenses to other affiliates. Please address the following:

a. Explain why the 2023 "Corporate Secretary – Annual General Meeting" total Emera expenses o of [redacted] are allocated equally to only the three affiliates of NSP, Emera Holdco, and TECO in the amount of [redacted], and identify and describe the allocation method used to allocate these 2023 costs to NSP, Emera Holdco, and TECO (and cite to pages of the related November 30, 2023, NSP CAM that describe this allocation method), and provide the related allocation factor percentage, inputs used in the allocation factor (including the numerator and denominator for all entities), and all other supporting calculations.

b. Regarding (a) above, explain why Emera did not use the allocator/causal link "Number of Hours" for allocating "Corporate Secretary – Annual General Meeting" expenses per the November 30, 2023, NSP CAM (pp. 59-60). The NSP CAM states that "Corporate Secretary" costs are provided by Emera to affiliates for "Corporate governance oversight for the entire Emera group of companies" (although the CAM also states that NSP receives the benefit of Corporate Secretary services from Emera but does not mention any other specific affiliates receiving these benefits).

c. Per (b) above, provide the related allocation factor percentage and inputs (including the numerator and denominator for all entities) used in the 2023 allocation factor "Number of Hours", identify the type of underlying data/inputs used for this allocator and how they are determined, and describe the type of "Hours" used in this allocator, the source of those Hours (and provide that source for 2023 "Hours"), and how those Hours are determined – provide all supporting calculations.

REDACTED

d. Per (a) and (b) above, explain why NSP, Emera Holdco, and TECO are the only affiliates presumed to receive some benefit from the "Corporate Secretary - Annual General Meeting" (since only these affiliates are allocated related costs from Emera), and explain why other affiliates do not receive any benefits from this meeting given the CAM clearly states that "Corporate Secretary" provides oversight benefits for the "entire Emera group of companies."

e. Identify and provide the amount of expenses by type and description (payroll, Board of Director fees and travel, corporate filing fees, etc.) that comprise "Corporate Secretary – Annual General Meeting" total 2023 Emera expenses of [redacted] and explain how these costs are (or are not) specifically and causally related to only NSP, Emera Holdco, and TECO (and not related to other affiliates).

ANSWER:

In addition to the answer below, please see Tampa Electric's response to "OPC Clarification Questions for TECO TEAMs Call – May 16, 2024".

a. Annual General Meeting ("AGM") costs are allocated on the basis of reporting issuers; affiliates who release their own financial statements. For each year allocations were provided it was allocated in even thirds between Emera, NSPI, and Tampa Electric, and we expect to continue to allocate on that basis go forward.

b. The above-referenced section of the CAM refers to Corporate Secretary costs excluding AGM costs. AGM allocations are covered in section 17.1 of the CAM which states that "Annual meeting of shareholders costs is collected in a unique Cost Pool in the ERP system identified by the account and will be reported in the Code Annual Report. These costs will be allocated by the number of reporting issuers identified. The Statistical Allocator for the annual meeting of shareholders is Reporting Issuers. It is the most suitable allocation cost driver as there is a direct link between the services provided on the number of reporting issuers."

c. Non-AGM Corporate Secretary costs are allocated on the number of hours or Work Plan metric. The Corporate Secretary maintains a time sheet, tracking all labor hours for each affiliate, which is provided monthly to Emera Corporate Accounting for the purposes of cost allocation. Please see supporting file "Corporate Secretary Time Sheet Summary".

d. Please refer to detailed responses in responses to subpoints (a) and (b).

e. All AGM costs are outside services for hosting the annual general meeting, and preparation of key reports discussed therein. Please refer to responses for subpoints (a) and (b) for explanation of allocations.

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TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF INTERROGATORIES
INTERROGATORY NO. 184
BATES PAGE(S): 30633 - 30635
MAY 23, 2024

184. Investor Relations Costs Allocated from Emera to TECO and Affiliates. Please refer to TECO's Confidential response to OPC's POD No. 37 Excel document "(BS 16846) Emera Affiliate Allocations – Annual Summary 2023_Highlighted" which shows total Emera 2023 Shared Services expenses by Function of [redacted] allocated to TECO and various affiliates, along with the related current November 30, 2023, NSP Cost Allocation Manual (CAM) that addresses how the following Shared Services/Corporate Overhead Costs are allocated from Emera to TECO and affiliates. The 2023 Function "Investor Relations" shows total Emera expenses of [redacted] allocated to affiliates NSP, Emera Holdco, Emera Energy, Barbados P&L, TECO, PGS, and NMG. Please address the following:

a. Identify and explain the allocation factor method used to allocate 2023 Function "Investor Relations" costs of [redacted] from Emera to NSP, Emera Holdco, Emera Energy, Barbados Light & Power, TECO, PGS, and NMG, (and cite to pages of the related November 30, 2023, NSP CAM that describe this allocation method), and provide the related allocation factor percentage, inputs used in the allocation factor (including the numerator and denominator for all entities), and all other supporting calculations.

b. Regarding (a) above, explain why the statistical allocator and causal link of "Reporting Issuers" is (or is not) used for allocating 2023 "Investor Relations" costs per the November 30, 2023, NSP CAM (pp. 76-77). Explain the term "Reporting Issuers" and identify the type of underlying data/inputs used for this allocator and how they are determined and identify the source document for "Reporting Issuers" (and provide that source for 2023 "Reporting Issuers"). Provide all supporting calculations for the 2023 "Reporting Issuers" allocation factor (including the allocation factor percentage and inputs used in the 2023 "Reporting Issuers" allocator, including the numerator and denominator for all entities).

c. Identify and provide the amount of expenses by type and description (payroll, marketing and preparation of materials provided to existing shareholders and potential investors, management of Investor Relations software, etc.) that comprise "Investor Relations" total 2023 Emera expenses of [redacted] and explain how these costs are (or are not) specifically and causally related to only NSP, Emera Holdco, Emera Energy, Barbados Light & Power, TECO, PGS, and NMG.

d. Regarding (a), (b) and (c) above, explain why "Investor Relations" costs are not allocated using the same allocation method for "Corporate Secretary – Annual General Meeting", when the causal link appears similar and related in providing benefits to the entire Emera group of companies. Otherwise, explain why "Investor Relations" costs do not benefit the entire Emera group of companies and is only limited to NSP, Emera Holdco, Emera Energy, Barbados Light & Power, TECO, PGS, and NMG (which are the affiliates to which Emera allocates costs in 2023 per POD Nos.37).

ANSWER:

In addition to the answer below, please see Tampa Electric's response to "OPC Clarification Questions for TECO TEAMs Call – May 16, 2024".

a. Investor Relations uses the statistical allocator of reporting issuers as found in the CAM section 14.15 page 75. "Reporting Issuers" are affiliates subject to securities regulations in either Canada or the US, which are Emera, NSPI and Tampa Electric. The Investor Relations cost pool is allocated in even thirds through this metric. Following that, a portion of Emera HoldCo's third is further allocated amongst non-reporting entities based on a weighted average of forecasted capital investment, rate base and earnings.

   Tampa Electric's portion of this allocation is 100 percent removed from Jurisdictional Adjusted Net Operating Income and does not impact the requested revenue requirement.

b. Please see the answer to subpart (a), above, for details on the allocations for Investor Relations.

   Tampa Electric's portion of this allocation is 100 percent removed from Jurisdictional Adjusted Net Operating Income and does not impact the requested revenue requirement.

c. Tampa Electric is answering this interrogatory in part by producing records as allowed under Florida Rule of Civil Procedure 1.340(c). Please see the attached document 'Emera Affiliate Allocations – Detailed Totals 2021 – 2023' for breakdown of gross costs by expenditure type, and answers to subparts (a) and (b), above, for rationale for allocating costs.

Tampa Electric's portion of this allocation is 100 percent removed from Jurisdictional Adjusted Net Operating Income and does not impact the requested revenue requirement.

d. Please see the company's answer to subparts (a) and (b), above, as well Interrogatory No. 183, above.

Tampa Electric's portion of this allocation is 100 percent removed from Jurisdictional Adjusted Net Operating Income and does not impact the requested revenue requirement.

REDACTED

TAMPA ELECTRIC COMPANY
DOCKET NO. 20240026-EI
OPC'S TENTH SET OF
INTERROGATORIES
INTERROGATORY NO. 185
BATES PAGE(S): 30636 - 30638
MAY 23, 2024

185. Chief Operations Office Costs Allocated from Emera to TECO and Affiliates. Please refer to TECO's Confidential response to OPC's POD No. 37 Excel document "(BS 16846) Emera Affiliate Allocations – Annual Summary 2023_Highlighted" which shows total Emera 2023 Shared Services expenses by Function of [redacted] allocated to TECO and various affiliates, along with the related current November 30, 2023, NSP Cost Allocation Manual (CAM) that addresses how the following Shared Services/Corporate Overhead Costs are allocated from Emera to TECO and affiliates. The 2023 Function "Chief Operations Office – Board Allocations" shows total Emera expenses of [redacted] allocated to affiliates NSP, Emera Energy, Barbados P&L, Grand Bahamas, TECO, PGS, and NMG. Please address the following:

a. Identify and explain the allocation factor method used to allocate 2023 Function "Chief Operations Office – Board Allocations" costs o of [redacted] from Emera to NSP, Emera Energy, Barbados Light & Power, Grand Bahamas, TECO, PGS, and NMG, (and cite to pages of the related November 30, 2023, NSP CAM that describe this allocation method). Explain the allocator/causal link used to allocate costs of this Function, identify the type of underlying data/inputs used for this allocator and how they are determined, and identify the source document (and provide that source for 2023). Provide all supporting calculations for the related 2023 allocation factor (including the allocation factor percentage and inputs (including the numerator and denominator for all entities).

b. Regarding (a) above, explain why the November 30, 2023, NSP CAM does not identify "Chief Operations Office – Board Allocations" in its Table of Contents (or in the body of the CAM) as a "Management and Administrative Services" (M&A) Function, and does not address an allocation method (and related statistical allocator and causal link) for this Function. Explain if these costs are direct or indirect assigned and why these costs should not be allocated similar to other M&A costs at the CAM.

c. Identify and provide the amount of expenses by type and description (payroll, Board of Director costs, software, marketing, etc.) to support the total 2023 Emera "Chief Operations Office – Board Allocations" expenses of [redacted] and explain how these costs are (or are not) specifically and causally related to only NSP, Emera Energy, Barbados Light & Power, Grand Bahamas, TECO, PGS, and NMG.

d. Regarding (a), (b) and (c) above, explain why "Chief Operations Office – Board Allocations" costs are not allocated using the same allocation method for "Corporate Secretary", when the causal link appears similar and related in providing benefits to the entire (or most) Emera group of companies. Otherwise, explain why "Chief Operations Office – Board Allocations" costs do not benefit most of the Emera group of companies and is only limited to NSP, Emera Energy, Barbados Light & Power, Grand Bahamas, TECO, PGS, and NMG.

ANSWER:

In addition to the answer below, please see Tampa Electric's response to "OPC Clarification Questions for TECO TEAMs Call – May 16, 2024".

a. Detail for the Emera Board Fees can be found in section 17.2 (page 84) of the CAM; Emera executives hold director and/or officer positions on internal and/or advisory boards for various affiliates. In these roles, the directors/officers provide strategic, operational, and leadership support to the affiliate. Comparable to the retainer and per meeting compensation external directors receive, Holdco allocates the compensation for each internal director and/or officer consistent with market rate for external directors over the course of the year, as approved by the Emera Board of Directors ("BOD") at the AGM.

   The Chief Operations Officer ("COO") is a separate cost from Board Allocations. These costs are for allocated payroll from the COO role for affiliates overseen by this individual. The role and associated allocation were retired in December of 2022. Subsequent to this, the COO group has been internally reorganized and the oversight that was previously provided is now handled by seconded employees whose costs are not reflected as an allocation.

b. Please see the company's response to subpart (a), above.

c. Please see the company's response to subpart (a), above, for expenditure type and description of Board Allocations. Only affiliates who have an Emera executive sitting in a director role on their Board receive these allocations.

d. Board Allocations are billed to affiliates with Emera executives on their board, whereas Corporate Secretary – AGM are applied to the entities who release their own financial statements as detailed in the company's answer to Interrogatory No. 184, above.

186. Confidential – Reasons for Fluctuations and Changes in Emera Costs Allocated to TECO and Affiliates. TECO's Confidential response to OPC's POD No. 37 includes three Excel documents (BS 16844, 16845, 16846) that show the amount of Shared Services expenses by Function (including Emera Total Corporate Overhead expense) allocated from Emera/Parent to all affiliates for calendar years 2021, 2022, 2023. Please address the following:

a. Explain why Emera "Audit Services" costs were allocated to TECO, PGS, and NMG in 2022 but not 2023, and explain if these costs are now direct assigned in 2023 and provide all direct assigned amounts for TECO, PGS and NMG in 2023 and explain the reason for the change.

b. Explain why Emera costs for numerous Functions (such as Human Resources, Talent Management, Total Rewards, Corporate Safety, and others) were allocated to various affiliates Brunswick Pipeline, Brooklyn Power, Emera Technologies, Emera Caribbean, Emera US Holding (and others) in 2022, but costs were not allocated to these affiliates in 2023. Provide all supporting calculations to support this explanation. Also, if these costs are now direct assigned in 2023 to these and other affiliates, then provide all direct assigned amounts for these affiliates (and others) by Function in 2023 and explain the reason for the change.

c. Explain why no Emera costs were allocated to TECO Partners in 2023.

d. The November 23, 2023, NSP CAM states that FTE is used as an allocator for the Functions Corporate Compliance (VP Compliance & Risk?), Corporate Wealth and Wellness, Corporate Safety (Director of Safety?), Corporate Environmental Policy and Programs, and Health and Wellness – although these specific Functions could not be located at the 2-37 POD Excel spreadsheets for 2022 and 2023. Explain corresponding Functions at the Excel spreadsheets for 2022 and 2023 or explain why these Functions no longer exist and identify the Functions that absorbed these costs (or explain if these costs are now direct assigned).

e. Explain the difference between the Functions "Human Resources" and

"Human Resources Operations" and explain why Emera allocates "Human Resources" costs to TECO, PGS, and NMG in 2023, but does not allocate any "Human Resources Operations" costs to these same affiliates in 2023.

f. For 2023, explain why some Emera Function costs (such as Audit Services, Corporate Insurance, Corporate Tax Services, Enterprise Risk Management, and Human Resources Operations) allocate little or no costs to TECO, PGS and NMG in 2023, but allocate costs to NSP, Emera Holdco, Emera Energy, Barbados Light & Power, Grand Bahamas (and perhaps other affiliates). Explain if the TECO, PGS, and NMG costs are direct incurred by TECO and allocated/assigned to PGS, NMG and other affiliates.

g. For 2023, explain why the Emera Functions Director of Safety, Total Rewards, Environmental Policy, and Investor Relations allocate a proportionately greater allocation of costs to TECO versus NSP (or the allocations to TECO approximate or are somewhat less than NSP for these Functions) – when compared to most Functions that allocate 25% to 34% of Emera costs to NSP for many Functions and allocate 10% to 15% of Emera costs to TECO for many Functions.

h. Explain why many of the Emera Function costs for 2023 are not allocated to affiliate TSI, and also explain why Emera allocates a significantly greater amount of costs for Office of the CDO to TSI (compared to lesser allocations of Office of the CDO costs to NSP and TECO – which normally receive a greater allocation of other Function costs from Emera when compared to TSI). Explain if this is because much of the IT-related costs are direct incurred by NSP and TECO and are not allocated from Emera to NSP and TECO.

ANSWER:

In addition to the answer below, please see Tampa Electric's response to "OPC Clarification Questions for TECO TEAMs Call – May 16, 2024".

a. The Audit Services group operates cross-border team, operating in Canada, the United States and Caribbean. In 2022, they created a new functional group "Audit Services US and CAR" to cleanly separate time spent working on Canadian affiliates ("Audit Services") and US and Caribbean affiliates. The "Audit Services" group now only has costs specifically related to Canadian affiliates. This enabled better tracking and allocation of costs to the appropriate affiliates as well as separating out expenses received from the U.S. Audit Services team that should remain in Canada. For example, Tampa Electric bills Emera Audit Services for any hours worked on Canadian projects. These costs are then able to be allocated out only to Canadian affiliates, avoiding the need for more onerous direct bills from Tampa Electric to the various Canadian affiliates.

b. For the functional groups, and affiliates listed above, the support provided in the company's response to OPC's Second Request for Production of Documents, No. 37 shows consistent allocations for values for both 2022 and 2023.

c. The absence of these Emera costs being allocated to TECO Partners in 2023 was an error. The company has estimated that the dollar amount that would have been allocated to TECO Partners was $58,300 (CAD). This would equate to approximately $43,500 (USD), the majority of which would have been charged to Tampa Electric in 2023. The company examined this issue further and determined that the absence of these Emera costs being allocated to TECO Partners was also present in the 2025 budget amounts. The company has estimated that the dollar amount that would have been allocated to TECO Partners in the 2025 budget is $60,300 (CAD). This would equate to approximately $45,000 (USD), the majority of which would have been charged to Tampa Electric in the 2025 budget.

d. In 2021, Emera adopted the CAM, and some functional groups updated their names to properly align with the CAM, summarized below:
   - Corporate Compliance became VP Compliance and Risk
   - Corporate Health and Wellness became Total Rewards - Health
   - Corporate Safety became Director Safety

- Corporate Environmental Policy and Programs became Environmental Policy
- Talent Acquisition became Talent Management – All Affiliates
- Chief Information Officer and Security became Chief Digital Officer ("CDO")

e. The "Human Resources" functional group is responsible for oversight of all human resources activity, leadership for both Emera and Affiliate HR staff. This includes oversight and support in response to the COVID-19 pandemic, oversight of the HR digital strategy, creation and execution of the DEI (Diversity, Equity, and Inclusion) strategy, and support of talent management. These services are provided to all Emera affiliates, requiring this group to allocate on the basis of headcount.

The "Human Resource Operations" functional group team supports specific affiliates overall recruitment and branding strategies for Emera's Canadian affiliates excluding NSP. This includes managing our recruitment application, our Applicant Tracking System (ATS), enhancing the candidate experience, positioning our companies as Employers of Choice, and reporting quarterly on key performance metrics and providing ongoing support regarding best practices. When called in to support other affiliates, charges are direct billed and removed from the allocated cost pool.

f. The intent behind the CAM is to ensure each affiliate only receives allocations for services they actually receive – for many of the listed functional groups they do not provide services to Tampa Electric, PGS or NMG. For example, the Enterprise Risk Management group allocates costs on the basis of license count – the listed affiliates do not hold licenses for the relevant software applications and therefore do not receive an allocation. If one of these groups were to incur costs on behalf of the listed affiliates they would coordinate a direct charge to the appropriate party.

g. Each functional group considered a Shared Service is required to determine the most appropriate statistical allocator for the services they perform –each group's allocations will differ to best align with the service they deliver.

h. Since the 2020 movement of employees from TECO Services Inc. to Tampa Electric Shared Services, the TSI designation has been used to show the costs assigned to the Tampa Electric shared service group and further allocated from Tampa Electric to the affiliates. Prior to 2023, Emera would allocate costs to Tampa Electric shared service (shown as TSI) for services performed for all of the TECO affiliates (Tampa Electric, PGS, NMGC) for further reallocation to those entities under the MMM. The TECO team requested in 2023 that Emera bill the appropriate affiliate directly on a go forward basis wherever possible.

The Office of the CDO (Chief Digital Officer) group allocates costs on the basis of computer count as of the end of 2023. Prior to that they were following the process described above flowing through Tampa Electric shared services. These costs historically would still have been allocated based on computer count; however all Tampa Electric, NMGC, and PGS computers were allocated to Tampa Electric's shared services for further allocation through the MMM.

AFFIDAVIT

STATE OF FLORIDA)
)
COUNTY OF HILLSBOROUGH)

Before me the undersigned authority personally appeared Jeff Chronister, who deposed and said that he is Vice President, Finance, Tampa Electric Company, and Tampa Electric's answers to the interrogatories specified below were prepared by him and/or under his direction and supervision and are true and correct to the best of his information and belief.

OPC's 10th Set of Interrogatories (Nos.174-186)

Dated at Tampa, Florida this 15th day of May, 2024.

Sworn to and subscribed before me this 15th day of May, 2024.

My Commission expires May 11, 2026

ELLENJANE C ROLFSEN
NOTARY PUBLIC - STATE OF FLORIDA
COMMISSION # HH264026
My Commission Expires May 11, 2026

Dated this 23rd day of May, 2024.

Respectfully submitted,

VPonder

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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that electronic copies of the foregoing answers have been served by posting on a shared document site, hand delivery of a USB drive or by electronic mail on this 23rd day of May 2024 to the following:

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ATTORNEY

CONFIDENTIAL - Source POD 2 - 37 Excel Spreadsheets

		A				B
				2025B	2024B	2023
IRR Response		Emera & Affiliates		Amount	Amount	Amount
	1	[redacted]		[redacted]	[redacted]	[redacted]
IRR 181 (f)	2	Nova Scotia Power		[redacted]	[redacted]	$ 9,281,239
IRR 181 (e)	3	[redacted]		[redacted]	[redacted]	[redacted]
IRR 181(b)	4	TECO		[redacted]	[redacted]	$ 4,132,878
IRR 181 (f)	5	[redacted]		[redacted]	[redacted]	[redacted]
IRR 181(c)	6	PGS		[redacted]	[redacted]	$ 1,334,044
IRR 181 (f)	7	NMG		[redacted]	[redacted]	$ 1,067,629
IRR 181 (d)	8	TSI		[redacted]	[redacted]	$ 1,158,626
IRR 181 (f)	9	Barbados P&L		[redacted]	[redacted]	$ 708,164
IRR 181 (f)	10	Grand Bahamas		[redacted]	[redacted]	$ 409,542
	11	[redacted]		[redacted]	[redacted]	[redacted]
	12	[redacted]		[redacted]	[redacted]	[redacted]
IRR 181 (a)	13	[redacted]		[redacted]	[redacted]	[redacted]
	14 = 4 + 8	Emera Charges to Tampa Electric (CAD), 2021-2023 ties to POD No. 138	(A)	$ 5,377,065	$ 5,245,917	$ 5,291,504
		Corporate Support Services - Direct Bill per Emera:				
	15	Emera Corporate Services (called "TSI recoveries") - MMM	(A)	7,985,765	7,790,990	9,562,410
	16	Pension Function (Labor, overhead and actuarial services)	(A)	121,021	118,069	233,657
	17	External Financial Reporting & Compliance (Labor)	(A)	8,823	8,608	5,823
			(A)	8,115,609	7,917,667	9,801,889
	18	Total Charges from Emera to Tampa Electric, Excluding Seconded Labor (CAD)	(A)	**$ 13,492,674**	**$ 13,163,584**	**$ 15,093,393**
	19	Corporate Support Services & Monthly Allocations (USD)	(B)	**$ 11,075,000**	**$ 10,752,453**	**$ 11,117,821**

(A) The 2021 - 2023 CAD presented on these rows tie to the section titled "Emera Charges to Tampa Electric" in POD No. 138.

(B) The 2021 - 2023 USD presented on this row ties to the section titled "Reconciliation to amounts shown on FERC Form 1 Diversification Pages" in POD No. 138.

C	D			E	F	G			
2022 Amount	2021 Amount	2025B Percent	2024B Percent	2023 Percent	2022 Percent	2021 Percent	2021 to 2023 Dollar Trending	2023 to 2024 Dollar Trending	2023 to 2025 Dollar Trending
[redacted]									
$ 8,970,310	$ 8,620,688	36%	36%	34%	35%	34%	Increasing	Increasing	Increasing
[redacted]		19%	19%	18%	19%	20%	Decreasing	Increasing	Increasing
$ 2,995,235	$ 2,751,316	17%	17%	15%	12%	11%	Increasing	Increasing	Increasing
[redacted]		10%	10%	10%	11%	10%	Increasing	Increasing	Increasing
$ 889,961	$ 597,285	5%	5%	5%	4%	2%	Increasing	Increasing	Increasing
$ 886,629	$ 913,344	5%	5%	4%	3%	4%	Increasing	Increasing	Increasing
$ 1,757,751	$ 2,074,586	1%	1%	4%	7%	8%	Decreasing	Decreasing	Decreasing
$ 850,685	$ 904,458	3%	3%	3%	3%	4%	Decreasing	Increasing	Increasing
$ 247,350	$ 639,224	2%	2%	2%	1%	2%	Decreasing	Increasing	Increasing
[redacted]		97%	97%	95%	95%	94%	Increasing	Increasing	Increasing
		3%	3%	5%	5%	6%	Decreasing	Decreasing	Decreasing
		100%	100%	100%	100%	100%	Increasing	Increasing	Increasing
$ 4,752,986	$ 4,825,902						Increasing	Decreasing	Increasing
9,089,255	9,243,710						Increasing	Decreasing	Decreasing
207,890	151,678						Increasing	Decreasing	Decreasing
7,603	6,280						Decreasing	Increasing	Increasing
9,304,749	9,401,668						Increasing	Decreasing	Decreasing
$ 14,057,735	**$ 14,227,570**						Increasing	Decreasing	Decreasing
$ 10,821,559	**$ 11,918,032**						Decreasing	Decreasing	Decreasing

EXHIBIT C
JUSTIFICATION FOR EXTENSION OF CONFIDENTIALITY PERIOD

N/A