



January 15, 2025

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 2026-2035 Storm Protection Plan
Dkt. No.: 20250016-EI**

Dear Mr. Teitzman:

Attached for filing in the above docket, is Tampa Electric Company's Petition for Approval of 2026-2035 Storm Protection Plan.

Thank you for your assistance in connection with this matter.

Sincerely,

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

Malcolm N. Means

MNM/bml
Attachment

cc: Walt Trierweiler, Office of Public Counsel
TECO Regulatory

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition of Tampa Electric Company)
For Approval of 2026-2035 Storm Protection Plan)
_____)

DOCKET NO. 20250016-EI

FILED: January 15, 2025

**TAMPA ELECTRIC COMPANY'S PETITION
FOR APPROVAL OF 2026-2035 STORM PROTECTION PLAN**

Tampa Electric Company ("Tampa Electric" or "the company"), pursuant to Section 366.96, Florida Statutes and Rule 25-6.030, Florida Administrative Code, petitions for Commission approval of its 2026-2035 Storm Protection Plan ("SPP"). In support of this petition, the company states:

I. Preliminary Information

1. The Petitioner's name and address are:

Tampa Electric Company
702 North Franklin Street
Tampa, Florida 33602

2. Any pleading, motion, notice, order, or other document required to be served upon

Tampa Electric or filed by any party to this proceeding shall be served upon the following individuals:

J. Jeffrey Wahlen
jwahlen@ausley.com
Malcolm N. Means
mmeans@ausley.com
Virginia Ponder
vponder@ausley.com
Ausley McMullen
Post Office Box 391
Tallahassee, FL 32302
(850) 224-9115
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Paula K. Brown
regdept@tecoenergy.com
Manager, Regulatory Coordination
Tampa Electric Company
Post Office Box 111
Tampa, FL 33601
(813) 228-1444
(813) 228-1770 (fax)

3. Tampa Electric is a Florida corporation and is a wholly owned subsidiary of TECO

Holdings, Inc., which is a wholly owned subsidiary of Emera Incorporated. The company is an

investor-owned public utility operating under the jurisdiction of the Florida Public Service Commission (“Commission”) pursuant to Chapter 366, Florida Statutes.

4. Tampa Electric provides retail service to over 860,000 retail customers in a 2,000 square mile service territory in Hillsborough and portions of Polk, Pinellas and Pasco Counties, Florida. Tampa Electric and its approximately 2,500 employees are committed to being a trusted energy partner for customers now and in the future.

5. This Petition represents an original pleading and is not filed in response to any proposed action by the Commission.

II. Applicable Law

6. Pursuant to Section 366.96(3) of the Florida Statutes, each public utility must file “a transmission and distribution storm protection plan that covers the immediate 10-year planning period.” The plan must “explain the systematic approach the utility will follow to achieve the objectives of reducing restoration costs and outage times associated with extreme weather events and enhancing reliability.” § 366.96(3), Fla. Stat.

7. The Commission will review Tampa Electric’s Storm Protection Plan (“SPP”) and “determine if it is in the public interest to approve the SPP measures proposed for the upcoming period” by considering the four factors set out in Section 366.96(4), Florida Statutes. *Citizens of State v. Fay*, No. SC2022-1733, 2024 WL 4777828 (Fla. Nov. 14, 2024), at *2. Subsection (4) of the SPP Statute “gives specificity as to the factors the Commission must consider in deciding whether a particular plan is in the public interest.” *Id.* At *6. The four factors set out in Section 366.96(4) of the Florida Statutes are:

- (a) The extent to which the plan is expected to reduce restoration costs and outage times associated with extreme weather events and enhance reliability, including whether the plan prioritizes areas of lower reliability performance.

(b) The extent to which storm protection of transmission and distribution infrastructure is feasible, reasonable, or practical in certain areas of the utility's service territory, including, but not limited to, flood zones and rural areas.

(c) The estimated costs and benefits to the utility and its customers of making the improvements proposed in the plan.

(d) The estimated annual rate impact resulting from implementation of the plan during the first 3 years addressed in the plan.

8. Based on its evaluation of these factors, the Commission "shall determine whether it is in the public interest to approve, approve with modification, or deny" approval of Tampa Electric's 2026-2035 SPP. § 366.96(5), Florida Statutes.

9. Rule 25-6.030 of the Florida Administrative Code is the Commission Rule that implements Section 366.96(3) of the Florida Statutes. It sets out the required contents for a storm protection plan. *See* R. 25-6.030(3)(a)-(j), F.A.C.

III. Statement on Disputed Issues of Material Fact

10. In compliance with paragraph (2)(d) of Rule 28-106.201, F.A.C., Tampa Electric states that it is not aware of any disputed issues of material fact at this time but acknowledges the possibility that the Office of Public Counsel and other parties could assert disputed issues of material fact during this proceeding.

IV. Statement of Ultimate Facts Alleged and Providing the Basis for Relief

11. Tampa Electric's 2026-2035 SPP is the result of a rigorous and comprehensive analysis of potential storm protection activities, including consideration of the four factors set out in Section 366.96(4) of the Florida Statutes, and builds on the company's prior storm hardening activities.

12. Tampa Electric's 2026-2035 SPP includes seven storm protection programs ("Programs") that were approved by the Commission in the company's prior SPPs, as well as two

new programs. The Company's 2026-2035 SPP also includes legacy storm hardening initiatives in place since 2006 and wood pole inspections.

13. The nine programs in Tampa Electric's 2026-2035 SPP are as follows, with new programs indicated by italics:

- Distribution Lateral Undergrounding
- Vegetation Management
- Transmission Asset Upgrades
- Substation Extreme Weather Hardening
- Distribution Overhead Feeder Hardening
- Infrastructure Inspections
- Legacy Storm Hardening Plan Initiatives
- *Transmission Switch Hardening*
- *Distribution Storm Surge Hardening*

14. These Programs collectively constitute the Company's "systematic approach to achieving the objectives of reducing restoration costs and outage times associated with extreme weather and enhancing reliability" as required by Section 366.96(3) of the Florida Statutes.

15. As explained in greater detail in the attached 2026-2035 SPP, and in the testimony of Kevin E. Palladino, A. Sloan Lewis, and Jason D. De Stigter filed contemporaneously with this Petition, these Programs will meet the goals of Section 366.96 to reduce restoration costs and outage times associated with extreme weather and enhance reliability.

16. Kevin E. Palladino's testimony introduces Tampa Electric's 2026-2035 SPP, and it also presents the nine SPP Programs and describes how each Program will achieve the objectives

of reducing restoration costs and outage times associated with extreme weather events and enhancing reliability.

17. A. Sloan Lewis’ testimony demonstrates that the company’s 2026-2035 SPP complies with Rule 25-6.030(g)-(h), Florida Administrative Code, by providing an estimate of the annual jurisdictional revenue requirements for each year of the SPP. Her testimony also provides an estimate of rate impacts for each of the first three years of the SPP for the company’s typical residential, commercial, and industrial customers.

18. Jason D. De Stigter’s testimony summarizes the results and methodology used by 1898 & Co. to develop a Storm Resilience Model for Tampa Electric. The Storm Resilience Model calculated the customer benefit of hardening projects in the Distribution Lateral Undergrounding, Transmission Asset Upgrades, Substation Extreme Weather Hardening, and Distribution Overhead Feeder Hardening Programs through reduced utility restoration costs and impacts to customers, prioritized hardening projects with the highest resilience benefit per dollar invested into the system, and established an overall investment level that maximizes customers benefit while not exceeding the company’s technical execution constraints.

19. Tampa Electric’s 2026-2035 SPP also contains each of the plan elements required by Rule 25-6.030(3) of the Florida Administrative Code.

a. Section 2 of the SPP includes a description of how implementation of the plan “will strengthen electric utility infrastructure to withstand extreme weather conditions” through hardening, undergrounding, and vegetation management as required by Rule 25-6.030(3)(a).

b. Section 2 of the SPP includes a description of how it “will reduce restoration costs and outage times associated with extreme weather conditions therefore

improving overall service reliability” as required by Rule 25-6.030(3)(b) in Section 3 of the Plan.

c. Section 1 of the SPP includes a description of the utility’s service area with the detail required by Rule 25-6.030(3)(c).

d. Section 4 of the SPP and the Appendices include a “description of each proposed storm protection program” that includes the detailed information required by Rule 25-6.030(3)(d).

e. Section 4 of SPP and the Appendices include, for the first year of the plan, a description of each storm protection project (“Project”) including actual or estimated construction start and completion dates, a description of the affected facilities, and a cost estimate including capital and operating expenses as required by Rule 25-6.030(3)(e)1. Some of the Programs, however, do not contain Projects.

f. Section 4 of the SPP includes, for the second and third years of the plan, “project related information in sufficient detail...to allow the development of preliminary estimates of rate impacts...” as required by Rule 25-6.030(3)(e)2. Some of the Programs, however, do not contain Projects.

g. The description of the Vegetation Management Program in the SPP includes a description of proposed vegetation management activities including the detail required by Rule 25-6.030(3)(f).

h. Section 5 of the SPP includes an estimate of the annual jurisdictional revenue requirements for each year of the plan as required by Rule 25-6.030(3)(g).

i. Section 6 of the SPP includes an estimate of the rate impacts for each of the first three years of the Plan for the utility's typical residential, commercial, and industrial customers as required by Rule 25-6.030(3)(h).

j. Finally, Section 7 of the SPP includes a description of all implementation alternatives that could have mitigated the rate impact for each of the first three years of the plan as required by Rule 25-6.030(3)(i).

V. Relief Requested

19. Tampa Electric respectfully requests that the Commission find that it is in the public interest to approve the company's proposed 2026-2035 SPP without modification.

WHEREFORE, Tampa Electric Company respectfully urges the Commission to find that it is in the public interest to approve the Company's 2026-2035 Storm Protection Plan without modification.

DATED this 15th day of January 2025

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY