AUSLEY MCMULLEN

Attorneys and Counselors at Law
123 South Calhoun Street
P.O. Box 391 32302
Tallahassee, FL 32301
P: (850) 224-9115
F: (850) 222-7560
ausley.com

March 31, 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 on behalf of Tampa Electric Company are revised Bates Pages 74, 98, 101-104, 114, 205, and 207 in the Direct Testimony of Kevin Palladino and Exhibit KEP-1 (DN 00267-2025) and Bates Page 37 in the Direct Testimony of Jason D. DeStigter (DN 00268-2025). A description of these changes is included below:

(1) Tampa Electric is revising Bates Pages 74, 98, 205, and 207 in Mr. Palladino's testimony and Bates Page 37 in Mr. DeStigter's testimony to remove references to the term "prudent" in response to objections raised by the Office of Public Counsel; and
(2) Tampa Electric is revising Bates Pages 101-104 and 114 to provide revised estimated customer counts for projects planned in the first year of the company's 2026-2035 Storm Protection Plan in response to issues raised by the Office of Public Counsel.

Thank you for your assistance in connection with this matter.

Sincerely,

Malcolm N. Means

MNM/bml
Attachment
cc: Walt Trierweiler, Office of Public Counsel
TECO Regulatory

5.4 Storm Protection Plan Program Budget Levels

Based on the experience from the two previous SPPs, Tampa Electric is able to provide more consistent annual targets for the SPP which results in a more consistent overall budget. For example:

- Distribution Lateral Undergrounding targets are between 65 to 85 miles converted annually
- Distribution Overhead Feeder Hardening targets are between 20 to 30 circuits completed
- Transmission Asset Upgrade circuits range from 10 to 15
- Vegetation Management targets are also consistent with the four-year goal of around 1,500 distribution miles.
    - 500 – 700 miles of Supplemental Distribution
    - 700 – 1,000 miles of Mid-Cycle Distribution
    - Around 500 miles of annual Transmission

As such, Tampa Electric strives to obtain these targets each year to harden our electric system in a focused, structured, and ~~prudent~~ thoughtful manner.

6. Storm Protection Plan Estimated Rate Impacts

Tampa Electric prepared estimated rate impacts for 2026, 2027, and 2028 of the proposed SPP.

Each year's costs derive from the Programs described in this SPP. For each Program, the capital-related costs, depreciation and return, and O&M costs are combined into a revenue requirement. For each year, the SPP Programs were itemized and identified as to whether they are substation, transmission, or distribution costs.

Tampa Electric applied the methodology that was established by the Commission in the company's most recent base rate proceeding to

resistance of control cabinets and related equipment. ~~Prudent~~ Carefully considered modifications will be made. Consideration will be given to whether there will be load to be served in the area of the substation immediately after a storm and if any load can be served from adjacent substations that are outside the flooded area.

5.1.5 Other

When transformers are added to an existing substation or a transformer is upgraded, if needed, existing fences are removed, and new fences are installed to meet or exceed current NESC wind and height standards. At the same time, animal protection covers are installed on all 13kV bushings, lightning arrestors, switches and leads. This helps prevent damage from debris that gets inside the substation.

5.2 Construction Standards

Tampa Electric uses galvanized tubular steel structures in new distribution substations. The tallest structure is approximately 24 feet above grade, with most of the structures and equipment being below 17 feet. Distribution feeder circuits are designed to exit the substation via underground cables installed inside a six-inch conduit.

In 230kV substations and 69kV switching stations, control buildings are used to house protection relays, communication equipment, Remote Terminal Unit ("RTU") monitoring equipment and substation battery systems. Previous construction methods used concrete block construction with poured concrete columns and concrete roof panels, which are designed to withstand winds of 120 mph without any damage to the building or the equipment housed inside. Control buildings currently being installed are prefabricated metal buildings designed for 150 mph wind loading. Tampa Electric installs eight-foot-tall perimeter chain link fences designed to 120 mph or walls designed to 125 mph. This

Tampa Electric's Distribution Lateral Undergrounding - Year 2026 Details

Project ID	Circuit No.	Specific Project Detail	Customers				Project Start Qtr	Construction		Project Cost in 2026
		OH to UG Length Converted (miles)	Residential	Small C&I	Large C&I	Total		Start Qtr	End Qtr	
LUG ESA 13454.90429155	13454	1.53	131	13	4	148	Q1 - 2026	Q1 - 2027	Q2 - 2027	$2,071,790
LUG CSA 14012.91573736	14012	1.31	173	18	6	197	Q1 - 2026	Q1 - 2027	Q2 - 2027	$1,597,114
LUG ESA 13433.10466911	13433	0.71	168	17	6	191	Q1 - 2026	Q1 - 2027	Q2 - 2027	$952,670
LUG WSA 13754.90097474	13754	0.62	194	20	7	220	Q1 - 2026	Q1 - 2027	Q2 - 2027	$756,400
LUG ESA 13911.90130568	13911	1.26	111	11	4	126	Q1 - 2026	Q1 - 2027	Q2 - 2027	$1,702,074
LUG WSA 13873.60311122	13873	1.40	216	22	7	245	Q1 - 2026	Q1 - 2027	Q2 - 2027	$1,824,383
LUG WSA 13078.10127958	13078	2.18	495	51	17	563	Q1 - 2026	Q1 - 2027	Q2 - 2027	$2,836,280
LUG CSA 13036.91479826	13036	0.51	366	37	12	416	Q1 - 2026	Q1 - 2027	Q2 - 2027	$528,269
LUG CSA 13045.10165356	13045	0.87	88	9	3	100	Q1 - 2026	Q1 - 2027	Q2 - 2027	$1,403,324
LUG WSA 13522.10392882	13522	2.55	150	15	5	170	Q1 - 2026	Q1 - 2027	Q2 - 2027	$3,312,715
LUG WSA 13638.91177941	13638	1.18	81	8	3	92	Q1 - 2026	Q1 - 2027	Q2 - 2027	$1,534,000
LUG WSA 13068.90098746	13090	0.99	60	6	2	68	Q1 - 2026	Q1 - 2027	Q2 - 2027	$1,287,000
LUG ESA 13230.92180224	13230	0.61	65	7	2	74	Q1 - 2026	Q1 - 2027	Q2 - 2027	$826,619
LUG WSA 13141.92630916	13141	0.44	54	5	2	61	Q1 - 2026	Q1 - 2027	Q2 - 2027	$574,524
LUG CSA 13046.91016874	13046	0.38	52	5	2	59	Q1 - 2026	Q1 - 2027	Q2 - 2027	$494,000
LUG ESA 14355.60258173	14355	0.16	334	34	11	379	Q1 - 2026	Q1 - 2027	Q2 - 2027	$212,983
LUG WSA 13199.10050730	13199	0.54	258	26	9	293	Q1 - 2026	Q1 - 2027	Q2 - 2027	$656,637
LUG CSA 13091.60029925	13091	0.98	99	10	3	113	Q1 - 2026	Q1 - 2027	Q2 - 2027	$1,274,000
LUG CSA 13224.92856634	13224	0.43	30	3	1	34	Q1 - 2026	Q1 - 2027	Q2 - 2027	$559,000
LUG WSA 13065.91354294	13065	0.22	129	13	4	147	Q1 - 2026	Q1 - 2027	Q2 - 2027	$286,000
LUG CSA 13045.10165381	13045	3.26	62	6	2	70	Q1 - 2026	Q1 - 2027	Q2 - 2027	$3,772,946
LUG WSA 13533.91060899	13533	0.67	128	13	4	146	Q1 - 2026	Q1 - 2027	Q2 - 2027	$871,000
LUG WSA 13165.91910924	13165	0.21	55	6	2	63	Q1 - 2026	Q1 - 2027	Q2 - 2027	$289,023
LUG CSA 13103.91232937	13103	1.16	109	11	4	124	Q1 - 2026	Q1 - 2027	Q2 - 2027	$1,508,000
LUG WSA 13191.60474882	13191	0.34	43	4	1	49	Q1 - 2026	Q1 - 2027	Q2 - 2027	$442,000
LUG ESA 13509.92890860	13509	0.33	8	1	0	9	Q1 - 2026	Q1 - 2027	Q2 - 2027	$452,045
LUG WSA 13586.92298267	13586	0.82	404	41	14	459	Q1 - 2026	Q1 - 2027	Q2 - 2027	$1,068,600
LUG CSA 13837.91563454	13837	0.39	127	13	4	144	Q1 - 2026	Q1 - 2027	Q2 - 2027	$480,259
LUG WSA 13756.10589595	13756	0.27	88	9	3	100	Q1 - 2026	Q1 - 2027	Q2 - 2027	$346,241
LUG WSA 13140.92408051	13140	1.07	42	4	1	48	Q1 - 2026	Q1 - 2027	Q2 - 2027	$1,391,000
LUG WSA 13218.60124027	13218	0.64	64	7	2	73	Q1 - 2026	Q1 - 2027	Q2 - 2027	$831,705
LUG SHA 13645.92207754	13645	0.73	11	1	0	12	Q1 - 2026	Q1 - 2027	Q2 - 2027	$988,977
LUG WSA 13754.90630567	13754	0.39	14	1	0	16	Q1 - 2026	Q1 - 2027	Q2 - 2027	$475,800
LUG WSA 13219.92005809	13219	0.42	48	5	2	54	Q2 - 2026	Q2 - 2027	Q3 - 2027	$540,917
LUG CSA 13419.90399851	13419	1.13	102	10	3	116	Q2 - 2026	Q2 - 2027	Q3 - 2027	$1,378,600
LUG PCA 13011.10625698	13011	1.23	26	3	1	30	Q2 - 2026	Q2 - 2027	Q3 - 2027	$1,504,260
LUG ESA 13133.10802850	13133	1.86	42	4	1	48	Q2 - 2026	Q2 - 2027	Q3 - 2027	$2,264,117

Tampa Electric's Distribution Lateral Undergrounding - Year 2026 Details										
Project ID	Circuit No.	Specific Project Detail	Customers				Project Start Qtr	Construction		Project Cost in 2026
		OH to UG Length Converted (miles)	Residential	Small C&I	Large C&I	Total		Start Qtr	End Qtr	
LUG CSA 13837.91812632	13837	0.41	160	16	5	182	Q2 - 2026	Q2 - 2027	Q3 - 2027	$501,425
LUG WSA 13082.60073788	13082	0.85	40	4	1	46	Q2 - 2026	Q2 - 2027	Q3 - 2027	$1,100,883
LUG CSA 13093.60029776	13093	0.46	56	6	2	64	Q2 - 2026	Q2 - 2027	Q3 - 2027	$593,778
LUG WSA 13754.90847913	13754	0.34	54	5	2	61	Q2 - 2026	Q2 - 2027	Q3 - 2027	$408,728
LUG WSA 13078.10127937	13078	1.60	50	5	2	57	Q2 - 2026	Q2 - 2027	Q3 - 2027	$2,078,209
LUG ESA 13127.90334707	13127	0.36	136	14	5	154	Q2 - 2026	Q2 - 2027	Q3 - 2027	$486,818
LUG WSA 13072.10165789	13072	0.48	28	3	1	32	Q2 - 2026	Q2 - 2027	Q3 - 2027	$624,000
LUG WSA 13217.92097014	13217	0.63	16	2	1	18	Q2 - 2026	Q2 - 2027	Q3 - 2027	$820,263
LUG WSA 13611.10092875	13611	0.67	107	11	4	122	Q2 - 2026	Q2 - 2027	Q3 - 2027	$872,016
LUG ESA 13906.92282884	13906	0.10	26	3	1	29	Q2 - 2026	Q2 - 2027	Q3 - 2027	$128,864
LUG CSA 13748.60111391	13748	0.73	70	7	2	80	Q2 - 2026	Q2 - 2027	Q3 - 2027	$891,363
LUG DCA 13330.92197131	13330	1.17	67	7	2	76	Q2 - 2026	Q2 - 2027	Q3 - 2027	$1,521,000
LUG WSA 13510.10218987	13510	0.15	193	20	7	219	Q2 - 2026	Q2 - 2027	Q3 - 2027	$195,000
LUG WSA 13191.10173522	13191	0.50	33	3	1	37	Q2 - 2026	Q2 - 2027	Q3 - 2027	$650,553
LUG WSA 13063.10124545	13063	0.51	41	4	1	47	Q2 - 2026	Q2 - 2027	Q3 - 2027	$693,497
LUG CSA 13218.60318065	13218	0.50	116	12	4	132	Q2 - 2026	Q2 - 2027	Q3 - 2027	$614,067
LUG WSA 13740.60614298	13740	1.01	29	3	1	33	Q2 - 2026	Q2 - 2027	Q3 - 2027	$1,308,221
LUG ESA 13509.10501141	13509	0.16	13	1	0	15	Q2 - 2026	Q2 - 2027	Q3 - 2027	$220,909
LUG CSA 13091.10163224	13091	0.76	50	5	2	57	Q2 - 2026	Q2 - 2027	Q3 - 2027	$931,180
LUG PCA 13390.92605381	13390	0.34	118	12	4	134	Q2 - 2026	Q2 - 2027	Q3 - 2027	$444,600
LUG PCA 13805.10916743	13805	0.48	7	1	0	8	Q2 - 2026	Q2 - 2027	Q3 - 2027	$625,300
LUG WSA 13112.92890357	13112	1.23	49	5	2	56	Q2 - 2026	Q2 - 2027	Q3 - 2027	$1,594,716
LUG CSA 13043.10093646	13043	0.56	44	5	2	50	Q2 - 2026	Q2 - 2027	Q3 - 2027	$678,264
LUG WSA 13206.10167762	13206	0.55	25	3	1	28	Q2 - 2026	Q2 - 2027	Q3 - 2027	$720,318
LUG SHA 13780.10723993	13780	0.27	89	9	3	101	Q2 - 2026	Q2 - 2027	Q3 - 2027	$364,602
LUG ESA 13326.10477228	13326	2.48	26	3	1	29	Q2 - 2026	Q2 - 2027	Q3 - 2027	$3,226,600
LUG WSA 13219.60518342	13219	0.47	15	2	1	17	Q2 - 2026	Q2 - 2027	Q3 - 2027	$611,010
LUG ESA 13793.92685255	13793	0.19	26	3	1	30	Q2 - 2026	Q2 - 2027	Q3 - 2027	$256,449
LUG CSA 13093.60031511	13093	0.80	26	3	1	29	Q2 - 2026	Q2 - 2027	Q3 - 2027	$1,040,000
LUG WSA 13483.60393455	13483	2.87	490	50	17	557	Q3 - 2026	Q3 - 2027	Q4 - 2027	$3,727,623
LUG WSA 13865.60305740	13865	0.14	37	4	1	42	Q3 - 2026	Q3 - 2027	Q4 - 2027	$181,951
LUG ESA 13502.10497396	13502	0.30	63	6	2	72	Q3 - 2026	Q3 - 2027	Q4 - 2027	$398,864
LUG WSA 13162.94434120	13162	0.60	60	6	2	68	Q3 - 2026	Q3 - 2027	Q4 - 2027	$780,000
LUG CSA 13175.60060554	13175	1.23	18	2	1	20	Q3 - 2026	Q3 - 2027	Q4 - 2027	$1,599,000
LUG WSA 13112.92874488	13112	0.35	35	4	1	40	Q3 - 2026	Q3 - 2027	Q4 - 2027	$478,534
LUG ESA 13878.10105726	13878	0.54	122	13	4	139	Q3 - 2026	Q3 - 2027	Q4 - 2027	$729,205
LUG CSA 14012.92299193	14012	0.62	260	27	9	296	Q3 - 2026	Q3 - 2027	Q4 - 2027	$756,677
LUG ESA 13231.10868121	13231	0.27	22	2	1	25	Q3 - 2026	Q3 - 2027	Q4 - 2027	$368,693
LUG CSA 13829.10425054	13829	0.24	48	5	2	55	Q3 - 2026	Q3 - 2027	Q4 - 2027	$245,791
LUG WSA 13624.10274748	13624	0.28	22	2	1	25	Q3 - 2026	Q3 - 2027	Q4 - 2027	$363,409
LUG WSA 13167.92398222	13167	0.37	11	1	0	13	Q3 - 2026	Q3 - 2027	Q4 - 2027	$481,000

TAMPA ELECTRIC COMPANY
DOCKET NO. 20250016-EI
EXHIBIT NO. KEP-1
WITNESS: PALLADINO
APPENDIX C
PAGE 4 OF 5
FILED: 01/15/2025
REVISED: 03/31/2025

Tampa Electric's Distribution Lateral Undergrounding - Year 2026 Details

Project ID	Circuit No.	Specific Project Detail	Customers				Project Start Qtr	Construction		Project Cost in 2026
		OH to UG Length Converted (miles)	Residential	Small C&I	Large C&I	Total		Start Qtr	End Qtr	
LUG ESA 13039.92496615	13039	1.45	60	6	2	68	Q3 - 2026	Q3 - 2027	Q4 - 2027	$1,882,400
LUG PCA 13723.60422059	13723	0.91	55	6	2	63	Q3 - 2026	Q3 - 2027	Q4 - 2027	$1,110,200
LUG WSA 13738.90267141	13738	0.22	277	28	9	315	Q3 - 2026	Q3 - 2027	Q4 - 2027	$286,000
LUG WSA 13082.60073803	13082	0.22	29	3	1	33	Q3 - 2026	Q3 - 2027	Q4 - 2027	$286,000
LUG SHA 13899.60005952	13899	0.91	73	7	2	83	Q3 - 2026	Q3 - 2027	Q4 - 2027	$1,184,300
LUG CSA 13036.10143568	13036	0.66	47	5	2	53	Q3 - 2026	Q3 - 2027	Q4 - 2027	$809,428
LUG WSA 13072.10165803	13072	0.52	10	1	0	11	Q3 - 2026	Q3 - 2027	Q4 - 2027	$639,863
LUG ESA 13795.90398961	13795	0.51	20	2	1	23	Q3 - 2026	Q3 - 2027	Q4 - 2027	$664,300
LUG WSA 13198.10051863	13198	0.42	59	6	2	67	Q3 - 2026	Q3 - 2027	Q4 - 2027	$567,000
LUG SHA 13900.91863298	13900	0.27	151	15	5	172	Q3 - 2026	Q3 - 2027	Q4 - 2027	$359,744
LUG WSA 13217.10247858	13217	0.83	30	3	1	34	Q3 - 2026	Q3 - 2027	Q4 - 2027	$1,078,313
LUG WSA 13219.92527637	13219	1.58	36	4	1	41	Q3 - 2026	Q3 - 2027	Q4 - 2027	$2,054,000
LUG CSA 13832.91532289	13832	0.74	31	3	1	35	Q3 - 2026	Q3 - 2027	Q4 - 2027	$962,000
LUG WSA 13068.10688316	13068	0.62	14	1	0	16	Q3 - 2026	Q3 - 2027	Q4 - 2027	$806,000
LUG WSA 13060.92907479	13060	0.46	258	26	9	293	Q3 - 2026	Q3 - 2027	Q4 - 2027	$598,000
LUG WSA 13167.10160212	13167	0.24	48	5	2	55	Q3 - 2026	Q3 - 2027	Q4 - 2027	$311,723
LUG WSA 13081.60008652	13081	0.08	27	3	1	31	Q3 - 2026	Q3 - 2027	Q4 - 2027	$111,477
LUG WSA 13164.10158932	13164	1.62	153	16	5	174	Q3 - 2026	Q3 - 2027	Q4 - 2027	$2,106,000
LUG WSA 13201.91868130	13201	0.59	112	11	4	127	Q3 - 2026	Q3 - 2027	Q4 - 2027	$771,440
LUG WSA 13016.92132257	13016	0.19	54	5	2	61	Q3 - 2026	Q3 - 2027	Q4 - 2027	$240,530
LUG WSA 13756.10589590	13756	0.59	27	3	1	31	Q3 - 2026	Q3 - 2027	Q4 - 2027	$767,000
LUG WSA 13622.60048809	13622	0.73	5	1	0	6	Q4 - 2026	Q4 - 2027	Q4 - 2027	$985,500
LUG WSA 13219.90098743	13218	0.77	108	11	4	123	Q4 - 2026	Q4 - 2027	Q4 - 2027	$939,400
LUG WSA 13621.91418404	13621	0.42	11	1	0	12	Q4 - 2026	Q4 - 2027	Q4 - 2027	$546,000
LUG WSA 13740.90487798	13740	2.09	49	5	2	56	Q4 - 2026	Q4 - 2027	Q4 - 2027	$2,717,000
LUG CSA 13034.10142238	13034	0.64	16	2	1	18	Q4 - 2026	Q4 - 2027	Q4 - 2027	$840,708
LUG WSA 13065.92238609	13065	0.45	24	2	1	27	Q4 - 2026	Q4 - 2027	Q4 - 2027	$611,987
LUG WSA 13078.90444684	13078	1.26	31	3	1	35	Q4 - 2026	Q4 - 2027	Q4 - 2027	$1,638,000
LUG WSA 13194.10286125	13194	1.68	54	5	2	61	Q4 - 2026	Q4 - 2027	Q4 - 2027	$2,266,112
LUG CSA 13417.92035203	13417	0.60	30	3	1	34	Q4 - 2026	Q4 - 2027	Q4 - 2027	$732,000
LUG WSA 13737.10007252	13737	0.46	4	0	0	5	Q4 - 2026	Q4 - 2027	Q4 - 2027	$598,000
LUG ESA 13878.10105728	13878	0.23	23	2	1	26	Q4 - 2026	Q4 - 2027	Q4 - 2027	$313,210
LUG WSA 13754.90423524	13754	0.54	35	4	1	40	Q4 - 2026	Q4 - 2027	Q4 - 2027	$657,007
LUG CSA 14012.91181114	14012	0.65	17	2	1	19	Q4 - 2026	Q4 - 2027	Q4 - 2027	$787,963
LUG WSA 13198.94019819	13198	0.23	47	5	2	53	Q4 - 2026	Q4 - 2027	Q4 - 2027	$299,000
LUG CSA 13036.10143504	13036	0.75	4	0	0	4	Q4 - 2026	Q4 - 2027	Q4 - 2027	$918,443
LUG WSA 13754.90915815	13754	0.91	12	1	0	14	Q4 - 2026	Q4 - 2027	Q4 - 2027	$1,110,200
LUG WSA 13208.90152415	13208	0.17	26	3	1	29	Q4 - 2026	Q4 - 2027	Q4 - 2027	$229,500
LUG ESA 13686.93697046	13686	0.40	26	3	1	29	Q4 - 2026	Q4 - 2027	Q4 - 2027	$544,347
LUG WSA 13080	13080	7.25	1091	43	7	1,141	Q4 - 2026	Q4 - 2027	Q4 - 2027	$2,614,095
LUG WHA 13371	13371	6.79	417	33	5	455	Q4 - 2026	Q4 - 2027	Q4 - 2027	$2,426,907

Tampa Electric's Distribution Lateral Undergrounding - Year 2026 Details										
Project ID	Circuit No.	Specific Project Detail	Customers				Project Start Qtr	Construction		Project Cost in 2026
		OH to UG Length Converted (miles)	Residential	Small C&I	Large C&I	Total		Start Qtr	End Qtr	
LUG WSA 13162	13162	2.71	213	128	33	374	Q4 - 2026	Q4 - 2027	Q4 - 2027	$1,004,493
LUG PCA 13125	13125	3.83	404	24	12	440	Q4 - 2026	Q4 - 2027	Q4 - 2027	$827,292
LUG CSA 13051	13051	0.88	69	30	5	104	Q4 - 2026	Q4 - 2027	Q4 - 2027	$328,788
LUG CSA 13093	13093	3.17	629	39	1	669	Q4 - 2026	Q4 - 2027	Q4 - 2027	$1,150,150
LUG ESA 13228	13228	2.79	103	98	31	232	Q4 - 2026	Q4 - 2027	Q4 - 2027	$1,014,796
LUG WSA 13140	13140	1.86	202	51	13	266	Q4 - 2026	Q4 - 2027	Q4 - 2027	$688,416
LUG WSA 13165	13165	0.54	53	27	10	90	Q4 - 2026	Q4 - 2027	Q4 - 2027	$193,578
LUG WSA 13164	13164	1.77	273	7	0	280	Q4 - 2026	Q4 - 2027	Q4 - 2027	$646,555
LUG WHA 13288	13288	0.54	41	29	10	80	Q4 - 2026	Q4 - 2027	Q4 - 2027	$197,491
LUG WSA 13638	13638	0.98	44	19	5	68	Q4 - 2026	Q4 - 2027	Q4 - 2027	$306,430
LUG WSA 13738	13738	0.60	32	8	7	47	Q4 - 2026	Q4 - 2027	Q4 - 2027	$224,055
LUG WSA 13141	13141	0.74	227	17	3	247	Q4 - 2026	Q4 - 2027	Q4 - 2027	$281,797

Tampa Electric's Distribution Storm Surge Hardening - Year 2026 Details											
Project ID	Circuit No.	Structure Count	Customers				Priority Customers	Project Start Month	Construction		Project Cost in 2026
			Residential	Small C&I	Large C&I	Total			Start Month	End Month	
SSH-TBD300	Multiple	174	24,054	2,405	859	27,318		Jan-26	Jan-27	Dec-27	$174,000

3 Vegetation Management Program Initiatives

TECO and Accenture analyzed the initiatives described in **Table 3-1** to determine an optimal blend of VM activity to reduce vegetation-related outages during extreme weather events while continuing to minimize day-to-day vegetation-related outages.

Table 3-1: Vegetation Management Initiatives

Initiative	Name	Description	Modeling Methodology
Initiative 1	**Distribution VM Four-Year Cycle**	Trim an equivalent of 25% of TECO s overhead lines (~1,534 miles) annually.	Target 25% of the miles in each of TECO's 7 service areas annually. Due to the nature of the algorithm and available targeting data, targeting is based on SAIDI performance in regular weather (i.e., blue sky).
Initiative 2	**Supplemental Distribution VM**	Trim an additional 400 – 700 targeted miles annually with a view to mitigating outage risk on those circuits most susceptible to storm damage	Six different approaches were evaluated – 400, 450, 500, 550, 600, and 700 miles. Targeting criteria is identical to Initiative 1.
Initiative 3	**Mid-Cycle Distribution VM**	Perform mid-cycle inspections on circuits, prescribing additional VM as needed. Periodicity is based on the following criteria: - Circuits with a trim periodicity of every 4 or more years: two years after trim - Circuits with a trim periodicity of every 3 years: two years after trim, skipping every other mid-cycle - Circuits with a trim periodicity of every 2 years: one year after trim, skipping every other mid-cycle	- The VMOT analysis assumes that a percentage of circuit's adjacent trees will be prescribed for trimming or removal (percentage varies based on circuit cycle periodicity; see **section 8.3.3** for details on criteria). - As VMOT works with miles of circuit rather than individual trees, this is modeled as a percentage of the circuit's miles re-setting to trimmed in that year, while the remainder of the circuit continues to age. Within the model, the costs associated with day-to-day restoration, major event restoration, and corrective maintenance costs are re-calculated to reflect the new trim-age profile of the circuit.

Initiative 2 (Supplemental Distribution VM) seeks to reduce tree-caused outages by reducing the proximity between tree limbs and lines, as well as reducing trees' sail area which would otherwise cause them to sway or break as wind speed increases.

Initiative 3 (Mid-Cycle Distribution VM) focuses on the same proximity and sail area reduction efforts as Initiative 2 but is primarily intended to address hazard trees and fast-growing tree species which may encroach on lines despite recurring VM cycle activity.

5 VM Activity Distribution Across Service Areas

For Initiative 1 (Distribution VM Four-Year Cycle), each service area is allotted one-quarter of its mileage every year, amounting to 1,534 miles across TECO's entire service territory. Central, for example, accounts for roughly 16.5% of TECO's overhead miles, and is allotted 16.5% of the annual 1,534-mile target as depicted in **Table 5-1.**

Table 5-1: Four-Year Cycle Mileage Targets

Service Area	Annual Mileage Target	Percentage
Central	253	16.5%
Dade City	92	6.0%
Eastern	209	13.6%
Plant City	306	20.0%
South Hillsborough	179	11.6%
Western	265	17.3%
Winter Haven	229	14.9%
TECO (Overall)	**1,534**	**100.0%**

For the mileage addressed via Initiative 2 (Supplemental Distribution VM), one quarter of the prescribed supplemental miles are allocated across the service areas in the same proportions as Initiative 1. The remainder of the miles are directed where they will deliver the greatest benefit in terms of reliability improvement per dollar spent, as determined by VMOT. To describe this in practical terms, for a strategy in which 400 miles of supplemental distribution VM are prescribed, 100 miles would be assigned across the service areas in accordance with the percentages outlined in the above table, with the remaining 300 miles directed to the areas where it would deliver the greatest benefit.

As covered in the **Vegetation Management Program Initiatives** section, Initiative 3 (Mid-Cycle Distribution VM) focuses on the same proximity and sail area reduction efforts as Initiative 2 but is primarily intended to address hazard trees and fast-growing tree species which may encroach on lines despite recurring VM cycle activity. **Table 3-1** shows how the annual inspection mileage for Initiative 3 is estimated on an annual basis.

6 VM Program Evaluation

TECO utilized VMOT to compare the projected impact of several SPP approaches by evaluating vegetation-related blue and gray sky reliability against relevant costs. TECO examined the resource implications of each approach and the relative reliability improvements for the additional dollars spent to determine the best strategy moving forward. To ensure that all model outputs were based on the most recent data available, TECO engaged Accenture to refresh the VMOT configuration and the various assumptions built into the VMOT Storm Report. The configuration refresh process and associated

vegetation density, asset condition, wind zone, and flood modeling. With this basis, hardening investment identification and prioritization provides a robust assessment to focus investment on the portions of the system that are more likely to fail in the major storm.

- Drives ~~Prudency~~Reasonableness: The assessment and modeling approach drives ~~prudency~~reasonableness for the Storm Protection Plan in that the business case allows Tampa Electric to invest in the portions of the system that provide the model value to customers.
- Balanced: Since storm events cannot be fully eliminated, the diversification of hardening measures allows Tampa Electric to provide a higher level of system resilience for customers.

Q. What conclusions can be made from the results of the resilience analysis?

A. The conclusions of Tampa Electric's Storm Protection plan evaluated within the Storm Resilience Model are:

- The overall investment level of $1.62 billion for Tampa Electric's Storm Protection Plan is reasonable and provides customers with maximum benefits. The projects selected have favorable project economics