



October 12, 2012

Mr. Mark Futrell
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: FPSC Smart Meter Workshop

Dear Mr. Futrell:

Thank you for providing Tampa Electric Company the opportunity to participate in the September 20, 2012, staff workshop on smart meters. I am writing on behalf of Tampa Electric to provide brief follow-up comments.

As indicated in the company's presentation at the staff workshop, Tampa Electric currently has more than 682,000 Automated Meter Reading (AMR) meters in service. Tampa Electric's AMR installation project began in September 2003 and was completed in January 2012. Our AMR deployment initiative is providing Tampa Electric with significant meter reading cost savings. Tampa Electric does not currently have any Advanced Metering Infrastructure (AMI) meters in service, but is evaluating AMI meters for future use in an upgraded system.

Tampa Electric believes its AMR meters are safe and accurate, complying with the American National Standard for Electric Metering (ANSI C12) and the Federal Communications Commission's Code of Federal Regulations. A third party, Advanced Compliance Solutions, tested and demonstrated that Itron's AMR meters used by Tampa Electric comply with Part 15, Subpart C of the FCC's Code of Federal Regulations. Tampa Electric's own testing has shown RF emissions from its meters are within the FCC Limits for Maximum Permissible Exposure for General Population/Uncontrolled Exposure expressed in the FCC OET Bulletin 56.

With respect to the concerns about customer privacy, Tampa Electric goes to great lengths to protect customers' personal information. The company adheres to the Fair Information Practice Principles established by the Federal Trade Commission in Title 16, Chapter 1 of the Code of Federal Regulations. Tampa Electric also has an internal Code of Ethics and Business Conduct that provides standards aimed at

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protecting sensitive customer information. It is important to note that Tampa Electric's AMR meters do not transmit personal information, such as names, addresses, social security numbers, billing account numbers and credit card numbers. Rather, AMR meters only transmit total kWh consumption, peak billing demand (commercial customers only), the meter serial number, meter type, tampering indicators and error checking information.

Throughout the process of installing AMR meters, Tampa Electric communicated with customers about the new meter installations through a variety of avenues, including bill inserts that included FAQs about the new technology, web pages dedicated to providing customers with AMR meter information, and in the white space on the monthly bill. Company representatives knocked on customers' doors to inform them of the change to an AMR meter. Presently, only a very limited number of residential customers have contacted Tampa Electric to express their concerns with AMR meters. After education about AMR technology, only 10 customers have requested a change to a non-AMR meter. These customers have concerns with RF emissions and privacy. As a temporary measure, Tampa Electric has replaced these 10 AMR meters with digital meters without an RF transmitter or delayed the installation of an AMR meter.

Given the foregoing, Tampa Electric does not believe it is necessary for the Commission to prescribe an opt-out mechanism at this time. Tampa Electric has a very small number of customers who have expressed concern about the company's AMR meters. Moreover, Tampa Electric's electric metering is safe, accurate, and complies with national standards and federal regulations, and Tampa Electric is committed to communicating with customers about new metering technologies and services in order to assure that customers continue to receive safe, adequate and reliable service.

If the Commission requires Tampa Electric to honor customers' requests to not have an AMR meter, then Tampa Electric believes the company should be allowed to implement cost-based charges to recover all of the costs associated with allowing customers to opt-out. Tampa Electric has not calculated what the level of these charges might be. The level of the charges will depend on the type of optional metering service authorized by the Commission. In general, the company believes there should be an additional monthly charge to recover the added cost of meter reading associated with non-AMR meters, as well as a charge to recover the cost of changing out a currently installed AMR meter for a non-AMR meter for those customers who choose to opt-out and already have an AMR meter installed at their location. Recovery of the additional costs associated with permitting customers to opt-out of standard service would prevent the company's general body of customers from subsidizing the costs imposed by the customers who opt-out.

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Thank you again for the opportunity to participate in the workshop. Please do not hesitate to call me if you have any questions.

Sincerely,



Wilbur J. Stiles, II
Manager Regulatory Affairs

cc: Walter Clemence, Florida Public Service Commission
Bill Ashburn, Tampa Electric Company
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