

Matilda Sanders

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Sent: Friday, May 26, 2006 11:45 AM
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Subject: E-Filing

Attachments: TECO Post Workshop Comments from 5-19-06.doc



TECO Post
Workshop Comments

A. James D. Beasley
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B. Docket No. 060172-EU
In re: Proposed rules governing placement of new electric distribution facilities underground, and conversion of existing overhead distribution facilities to underground facilities, to address effects of extreme weather events.

and Docket No. 060173-EU
In re: Proposed amendments to rules regarding overhead electric facilities to allow more stringent construction standards than required by National Electric Safety Code.

C. Tampa Electric Company

D. Document consists of 3 pages

E. The attached document is Tampa Electric Company's Post-Workshop Comments to Staff's May 19, 2006 Rule Development Workshop

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FPSC-COMMISSION CLERK

**MAY 19, 2006 RULE DEVELOPMENT WORKSHOP
POST-WORKSHOP COMMENTS OF TAMPA ELECTRIC RELATED TO
DRAFT RULES IN DOCKET NO. 060172-EU AND DOCKET NO. 060173-EU
DATED MAY 26, 2006**

Tampa Electric submits the comments below for consideration in the development of Rules 25-6.034, 25-6.0345, 25-6.064, 25-6.078 and 25-6.115.

Rule 25-6.034

- Tampa Electric would strongly urge the deadline for submitting construction standards to the Director of Economic Regulation be 180 days. Also, security issues arise if these construction standards become public documents. Therefore, the company believes a process of confidentiality is necessary to assure that no part of the submitted construction standards become public information.
- Subsection (5), line 19; Subsection (6), line 5; and Subsection (7)(a), line 13 contain the phrase “reasonably practical and feasible.” Tampa Electric would suggest “cost-effective” be inserted such that the phrase would state “reasonably practical, **cost-effective** and feasible.”
- Subsection (6) should end with the word “surges” on line 6.
- Line 9 would be more descriptive by adding the word “distribution” such that it would read “Location of the utility’s **distribution** facilities.”
- Subsection (7)(a), line 14 should include the phrase “**or in rights-of-way**” after the word “easements.” Likewise, Subsection (7)(b), line 18 should be stated “easements **or access to rights-of-way.**”
- Tampa Electric’s comments on Subsection (8) are expressed in the joint post-workshop comments submitted by the investor-owned utilities.

Rule 25-6-0345

- Tampa Electric has no comments on the proposed changes to this rule.

Rule 25-6.064

- Much discussion, confusion and misunderstanding has surrounded the proposed changes to this rule during the April 17, 2006 and the May 19, 2006 workshops. Tampa Electric would strongly urge the only change to Subsection (2) of the current rule be a simplification of the contribution-in-aid-of-construction (CIAC) calculation to two formulas – one for overhead facilities and one for underground facilities. The company provided a workable, easy to understand proposal in its comments submitted on May 3, 2006. That proposal could simplify the calculation to a certain extent and be adopted by field personnel with relative ease of understanding. By incorporating these proposed two formulas into the rule, the amount of CIAC currently being calculated for overhead or underground facilities will not change and therefore subsidies will not occur. In the alternative, if one CIAC formula must be a final result, Tampa Electric has developed a new proposal and would urge consideration of the formula found and explained on page 3 of these comments.

- Tampa Electric is supportive of the balance of proposed changes to this rule.

Rule 25-6.078

- Tampa Electric has no comments on the proposed changes to this rule.

Rule 25-6.115

- Tampa Electric has no comments on the proposed changes to this rule.

$$\mathbf{CIAC = A - B - C}$$

A = Either:

For OH installations:

Total cost of the overhead facilities installation
including transformer, service and meter

For UG installations:

Total cost of underground installation
including transformer, service and meter

B = Lesser of:

4 x the annual demand and energy base revenue

or

Total cost of overhead installation
excluding transformer, service, and meter

C = Cost of OH transformer, service and meter