

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: May 26, 2015
TO: Carlotta S. Stauffer, Commission Clerk, Office of Commission Clerk
FROM: Pamela H. Page, Senior Attorney, Office of the General Counsel *PH*
RE: Docket No. 150000-OT

Please place the attached letter in docket No. 150000-OT.

Thank you.

RECEIVED-PPSC
15 MAY 26 AM 10: 06
COMMISSION
CLERK

AUSLEY McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

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(850) 224-9115 FAX (850) 222-7560

May 22, 2015

VIA: ELECTRONIC TRANSMISSION

Ms. Pamela H. Page
Staff Attorney
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: UNDOCKETED - Proposed Amendments to Rule 25-6.0436, F.A.C., Depreciation, Rule 25-6.04364, F.A.C., Electric Utilities Dismantlement Studies, Rule 25-7.045, F.A.C., Depreciation, and Rule 25-7.046, F.A.C., Subcategories of Gas Plant for Depreciation

Dear Ms. Page:

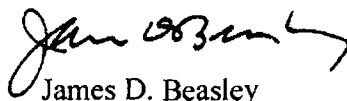
On behalf of Tampa Electric Company and Peoples Gas System, I offer the following comments and suggestions regarding the proposed amendments to the above rules set forth in the undocketed notice issued April 30, 2015.

The proposed rule moves language regarding when the utility is to file a new depreciation study (at least once every four years) from page 11 to page 8. However, an important piece of the language on page 11 is not replicated on page 8. Specifically, it is the last part of the sentence that reads ". . . unless otherwise required by the Commission." Tampa Electric believes that this language should be added to the end of the applicable sentence on page 8, line 12, to retain this important capability of the Commission to require a new study sooner or extend the time before a utility must file a new study. This discretion should not be removed. Importantly, Tampa Electric is under an existing order of the Commission that addresses this very point and the new rule language should not be placed in opposition to existing Commission orders.

Similarly, with respect to gas utilities, the rule notice moves the depreciation study filing requirement every five years, from page 21-22 of the notice to page 19 of the notice, at lines 5 through 7 on page 19, without replicating the phrase ". . . unless otherwise required by the Commission." This phrase should be inserted at the end of the sentence on page 19, line 7, for the same reasons stated above.

We appreciate your consideration of the foregoing suggested modifications to the proposed rule amendments.

Sincerely,

A handwritten signature in black ink, appearing to read "James D. Beasley", with a stylized flourish at the end.

James D. Beasley

JDB/pp

cc: TECO Regulatory Department