

AUSLEY McMULLEN

ATTORNEYS AND COUNSELORS AT LAW

123 SOUTH CALHOUN STREET
P.O. BOX 391 (ZIP 32302)
TALLAHASSEE, FLORIDA 32301
(850) 224-9115 FAX (850) 222-7560

July 17, 2015

VIA: ELECTRONIC FILING

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

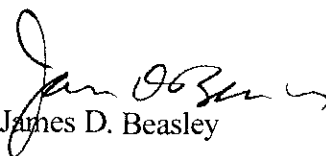
Re: Petition of Tampa Electric Company for approval of the phased closure of its Residential Load Management Program; FPSC Docket No. 150147-EG

Dear Ms. Stauffer:

Attached for filing in the above docket is Tampa Electric Company's Responses to Staff's Second Data Request dated July 6, 2015.

Thank you for your assistance in connection with this matter.

Sincerely,


James D. Beasley

JDB/pp
Attachment

cc: Don Rome (w/attachment)

**TAMPA ELECTRIC COMPANY
DOCKET NO: 150147-EG
STAFF'S 2ND DATA REQUEST
REQUEST NO. 1
PAGES: 1 OF 1
FILED: JULY 17, 2015**

1. Please refer to Bates pages 3 and 24 of the Company's response to Staff's First Data Request and to page 5 of the petition. Each page lists a different date by which TECO proposes to complete its phase-out of the Prime Time program (i.e., "end of 2016", July 1, 2016, and July 31, 2016, respectively). Please clarify the date by which TECO proposes to complete its phase-out of the program.
 - A. The dates listed in the Company's responses to Staff's First Data Request and the petition reflect the following:
 - "July 1, 2016" given in Response No. 13 of Staff's First Data Request filed June 24 references the date for which all remaining customers on the Prime Time program will be removed.
 - "July 31, 2016" given on page 5 of the Petition of Tampa Electric Company for Approval of the Phased Closure of its Residential Load Management program filed May 20 references the date that all credits paid to customers will cease. Because of billing cycles, some Prime Time customers will receive credits in July, 2016 even though these customers were removed prior to July 1, 2016.
 - "End of 2016" given in Response No. 1 of Staff's First Data Request filed June 24 references the completion of all field activities in closing the Prime Time program. Field activities are the process of having a licensed electrician visit the home and disconnect the Prime Time equipment.

Tampa Electric is not proposing to change the above dates for the completing the phase-out of the program.

**TAMPA ELECTRIC COMPANY
DOCKET NO: 150147-EG
STAFF'S 2ND DATA REQUEST
REQUEST NO. 2
PAGES: 1 OF 1
FILED: JULY 17, 2015**

2. Please refer to Bates pages 4, 5, and 25 of the Company's response to Staff's First Data Request. Bates page 4 states that "[t]he table below shows the number of participants that were on Tampa Electric's Prime Time program at the start of each year since 2005...". However, the number of participants shown for each year on Bates page 5 is less than the "average participants" shown for each year on Bates page 25. During a period of generally trending attrition, one would expect beginning-of-year numbers to be greater as opposed to less than the average numbers for the year. Please explain.
- A. Tampa Electric has reviewed its response to Staff's First Data Request, Request No. 2, which the company submitted on June 24 and has determined that the original response contained a copy-and-paste error which explains the discrepancy noted in the Staff's current Data Request. Set forth below is the corrected table for Response No. 2 of Staff's First Data Request, which supersedes the table contained in the June 24 response:

The Company has included the value for 2015 which shows the difference between 2014, as 11,202 customers. This number includes general attrition and the attrition as a result of the systematic phased closure of the Prime Time program. Of those, approximately 8,700 customers were removed due to the systematic phased closure activities.

	No. of Participants	Summer kW Savings	Winter kW Savings
2005	71,133	60,748	106,344
2006	62,510	53,384	93,452
2007	57,029	48,703	85,258
2008	53,555	45,736	80,065
2009	50,683	43,283	75,771
2010	48,080	41,060	71,880
2011	45,429	38,796	67,916
2012	42,892	36,630	64,124
2013	40,365	34,472	60,346
2014	37,482	32,010	56,036
2015	26,280	22,443	39,289

**TAMPA ELECTRIC COMPANY
DOCKET NO: 150147-EG
STAFF'S 2ND DATA REQUEST
REQUEST NO. 3
PAGES: 1 OF 1
FILED: JULY 17, 2015**

3. Please refer to Bates page 12 of the Company's response to Staff's First Data Request. Please explain the reason(s) for the downward trend in interruptions ("Number of Controls in Year") between 2005 and 2014.
- A. The downward trend of implementation of the Prime Time program for load control events by Tampa Electric is due to two main reasons.

First, Tampa Electric is a member of a Reserve Sharing Group ("RSG"). A RSG is a group of balancing areas that pool their generating resources to back-up a loss of a firm resource in order to meet the North American Electric Reliability Corporation ("NERC") Disturbance Control Standard ("DSC"). If a member loses a generating resource, they can call on the RSG for operating reserves to replace the lost resource for up to 30 minutes. The RSG has to meet the DCS criteria within 15 minutes. Tampa Electric's contribution to the RSG over the time period of 2005 – 2014 has averaged 100 MW.

From 2005 to 2009, to comply with the RSG requirements, the Company utilized any spinning reserves that were available and if needed, the operating reserves control of the Prime Time system. During this timeframe, Tampa Electric did not have any units that could be started within 15 minutes. The operating reserves control of the Prime Time system dropped all participating customers immediately and left them curtailed for 30 minutes. After this 30-minute control, over the next 15 minutes the operating reserves control is gradually lifted in order for the system to gradually pick up the load.

Second, the decline from 2009 to 2014 was due to the addition of aero derivative units to Tampa Electric's generation fleet. These smaller generators can synchronize to the grid in six minutes and can be fully loaded in 11 minutes. These units were released for commercial operation in 2009 and with these units available the need to utilize the Prime Time operating reserves control was greatly reduced.

**TAMPA ELECTRIC COMPANY
DOCKET NO: 150147-EG
STAFF'S 2ND DATA REQUEST
REQUEST NO. 4
PAGES: 1 OF 1
FILED: JULY 17, 2015**

4. Please refer to Bates page 20 of the Company's response to Staff's First Data Request. Please show how the "Summer kW Savings" and "Winter kW Savings" amounts were derived for both the Prime Time and Energy Planner programs.
 - A. Prime Time: Tampa Electric developed the Summer and Winter kW savings of the Prime Time program for the petition by utilizing the Company's load forecasting data associated with the program's current participants. For this analysis, 2014 was chosen to enable using the same cost-effectiveness test assumptions that were used to develop the 2015-2024 Demand Side Management ("DSM") Plan so that an accurate comparison could be made against the prior cost-effectiveness test results for the 2005-2014 DSM Plan that initially showed the program to be not cost-effective.

Energy Planner: Tampa Electric developed new summer and winter kW savings along with new annual energy savings in 2014 for the Energy Planner program to facilitate the DSM Plan that would support the recently Commission approved numeric DSM goals. To develop the new summer and winter kW and annual energy savings, the Company utilized control groups of those that are participating in the Energy Planner compared to those that do not participate in any DSM programs. The analysis used a comparison of daily energy usage as well as usage changes from control events to analyze and determine what a typical Energy Planner participant would save.

**TAMPA ELECTRIC COMPANY
DOCKET NO: 150147-EG
STAFF'S 2ND DATA REQUEST
REQUEST NO. 5
PAGES: 1 OF 1
FILED: JULY 17, 2015**

- 5.** Please refer to Bates page 20 of the Company's response to Staff's First Data Request. Please clarify the units in which the "Annual Energy savings" are expressed for both the Prime Time and Energy Planner programs.

- A.** The annual energy savings for the Prime Time and Energy Planner programs in Response No. 11 of Staff's First Data Request filed June 24 are expressed in units of "kWh".

**TAMPA ELECTRIC COMPANY
DOCKET NO: 150147-EG
STAFF'S 2ND DATA REQUEST
REQUEST NO. 6
PAGES: 1 OF 1
FILED: JULY 17, 2015**

- 6.** Please refer to Bates page 24 of the Company's response to Staff's First Data Request and to page 4 of the petition regarding TECO's cessation of the removal of customers from the Prime Time program. Please confirm the actual date on which the "systematic phased closure process" of the Prime Time program was suspended.

- A.** Tampa Electric suspended the systematic phased closure process of the Prime Time program on May 7, 2015.

**TAMPA ELECTRIC COMPANY
DOCKET NO: 150147-EG
STAFF'S 2ND DATA REQUEST
REQUEST NO. 7
PAGES: 1 OF 1
FILED: JULY 17, 2015**

7. Please refer to Bates pages 2 and 24 of the Company's response to Staff's First Data Request. Item "d" on page 2 describes the process by which TECO gradually increased the rate at which customers were removed from the Prime Time program to 1,600 customers per month. Page 24 indicates the intent to remove 14,000 customers (2,333/month) between December 31, 2015 and June 30, 2016. Please explain how TECO proposes to accommodate an increase of nearly 50 percent in the customer removal rate without experiencing a reduction in the quality of customer service.
 - A. If approved, Tampa Electric plans to remove the remaining Prime Time participants with the same level of customer service by utilizing temporary resources and contractors to assist with the additional workload the Company anticipates with the increase in removal rate. The temporary resources will be used for creating and processing work orders and assisting the Load Management Team with verification inspections. The licensed electrical contractors will be used to support the increased field activities through the de-energizing or removal of Prime Time equipment at participant's homes. These temporary resources and electrical contractors will be released once the final phase out is complete.

**TAMPA ELECTRIC COMPANY
DOCKET NO: 150147-EG
STAFF'S 2ND DATA REQUEST
REQUEST NO. 8
PAGES: 1 OF 1
FILED: JULY 17, 2015**

- 8.** Would TECO propose to remove Tariff Sheets 3.110, 3.111, and 3.112 from the Company's approved tariffs if the Commission were to approve this petition?
- A.** Yes, Tampa Electric would propose to remove Tariff Sheets 3.110, 3.111 and 3.112 that cover the Prime Time program once all participants have been removed from the program.