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Public Service Commission

November 19, 2015

James Beasley
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STAFF FIRST DATA REQUEST

RE: Docket No. 150223--EI – Petition for approval of new environmental program for cost recovery through Environmental Cost Recovery Clause, by Tampa Electric Company.

Dear Mr. Beasley,

By this letter, the Commission staff requests that Tampa Electric Company (TECO or utility) provide responses to the following data requests.

The following questions pertain to page 2, paragraph 4, of TECO's Petition:

1. TECO stated that activities related to the CCR Rule's requirements will cause TECO to "incur incremental O&M expenses beginning in the fourth quarter of 2015 and continuing for the remaining operational life of Big Bend Station." Please provide an estimate of the amounts of expenditures that TECO expects to be of a recurring nature, including a description of each expense.
2. TECO stated that "In 2015 and 2016, CCR Rule compliance activities at Big Bend Station will include... increasing the frequency of inspections..." Please provide a list of costs incurred in the previous 4 quarters, along with a description of each amount, for inspections at Big Bend Station related to the CCR Rule.
3. TECO indicted that "CCR Rule compliance activities at Big Bend Station will include placing fugitive emissions dust control plans in place."
 - a. What are the "fugitive emissions dust control plans?"
 - b. Please identify who, TECO or its consultants, are/will develop these plans.

- c. Please explain whether these plans require the approval of the Department of Environmental Protection or any other governmental agency.
 - d. Please provide TECO's estimates of the annual O&M costs associated with this specific compliance activity for 2015, 2016, and 2017, respectively.
 - e. Has any part of the costs discussed in Question No. 3.d. been included in TECO's 2016 ECRC projection schedules filed on August 31, 2015, in Docket No. 150007-EI? If your response is affirmative, please identify the number(s) of the corresponding schedules, page and line numbers, and dollar amounts.
4. TECO indicated that its planned compliance activities at Big Bend Station include installing new groundwater monitoring wells at regulated CCR management units.
 - a. Please explain how many monitoring wells will be installed in total from 2015 – 2017.
 - b. Please identify how many such wells will be installed in 2015, 2016 and 2017, respectively.
 - c. Please identify each of the regulated CCR management units at Big Bend Station.
 - d. Please identify how many monitoring wells will be installed for each unit identified in Question No. 4.c.
 - e. Please provide the estimates of the annual O&M costs associated with this specific compliance activity for 2015, 2016 and 2017, respectively.
 - f. Has any part of the costs discussed in Question No. 4.e. been included in TECO's 2016 ECRC projection schedules? If your response is affirmative, please identify the number(s) of the corresponding schedules, page and line numbers, and dollar amounts.
5. Please refer to page 2, paragraph 5 of the petition:
 - a. Please identify how many regulated surface impoundments are there at Big Bend Station.
 - b. Please explain how many engineering evaluations are expected to be performed.
 - c. Please identify who, TECO or its consultants, will perform these evaluations.
 - d. Does TECO expect to perform all the evaluations in 2016? Please explain.
 - e. Please provide the projected total O&M costs associated with these compliance activities.

- f. Are the projected total O&M costs described in Question 5.e. the same as what TECO identified for project 2 in the table on page 4 of the petition? If not, please provide explanation.
 - g. Have the costs discussed in Question No. 5.e. been included in TECO's 2016 ECRC projection schedules? If your response is affirmative, please identify the number(s) of the corresponding schedules, page and line numbers, and dollar amounts.
6. Please refer to page 2, paragraph 6 of the petition:
- a. TECO stated that “[o]ther engineering efforts will be required to evaluate alternatives for design of new or modified facilities to ensure future compliance with the CCR Rule.” Please describe the engineering efforts referenced.
 - b. Please define the “facilities” referenced.
 - c. Please identify, respectively, all the new facilities and modified facilities referenced.
 - d. TECO indicates that the compliance efforts of evaluating alternatives for design will begin in early 2016. Please identify when such efforts expected to be completed.
 - e. Please provide the estimate of the O&M costs associated with such compliance efforts in 2016.
 - f. Have the costs identified in Question No. 6.e. been included in the Table on page 4 of TECO's petition? If your response is affirmative, please identify the project number in the table in which such costs are included. If your response is negative, please explain why not.
 - g. Have the costs discussed in Question No. 6.e. been included in TECO's 2016 ECRC projection schedules? If your response is affirmative, please identify the number(s) of the corresponding schedules, page and line numbers, and dollar amounts.
 - h. After each design evaluation of modified facilities being completed, will the actual facility modification project be implemented? Please explain.
 - i. If your response to Question No. 6.g. is affirmative, please explain when TECO plans to notify the Commission before it commences the modification project.

7. Please refer to page 3, paragraph 7.(a) of the petition:
 - a. Please identify what entity, TECO or its contractors, will carry on the project of residual slag removal and liner installation.
 - b. Please identify the expected O&M costs and the capital costs associated with these compliance activities for 2016 and 2017, respectively.
 - c. Are the costs identified in Question 7.b. the same as what TECO identified for project 3 in the table on page 4 of its petition? If not, please provide explanation.
 - d. Has any part of the costs discussed in Question No. 7.b. been included in TECO's 2016 ECRC projection schedules? If your response is affirmative, please identify the number(s) of the corresponding schedules, page and line numbers, and dollar amounts.

8. Please refer to page 3, paragraph 7.(b) of the petition:
 - a. TECO stated that the North Gypsum Stackout area will need to be modified to meet the CCR Rule's requirements. Please provide an explanation of the statement, "*otherwise, the area will be regulated as a landfill.*"
 - b. Please identify what entity, TECO or its contractors, will carry on this compliance project.
 - c. Please identify the expected O&M costs and the capital costs associated with the compliance activities for 2016 and 2017, respectively.
 - d. Are the costs identified in Question 8.c. the same as what TECO identified for project 4 in the table on page 4 of its petition? If not, please provide explanation.
 - e. Has any part of the costs discussed in Question No. 8.c. been included in TECO's 2016 ECRC projection schedules? If your response is affirmative, please identify the number(s) of the corresponding schedules, page and line numbers, and dollar amounts.

9. Please refer to page 4, paragraph 8 of the petition:
 - a. Please identify all CCR units to be constructed and existing CCR units to be corrected/modified.
 - b. Please identify the expected O&M cost and the capital cost associated with the projects identified in Question No. 9.a. by CCR unit.
 - c. Are the total associated costs provided in Question 9.b. the same as what TECO identified for project 5 in the table on page 4 of its petition? If not, please provide explanation.

- d. Have the costs discussed in Question 9.b. been included in TECO's 2016 ECRC projection? If your response is affirmative, please identify the number(s) of the corresponding schedules, page and line numbers, and dollar amounts.
 - e. Row 5 of the table on page 4 is labeled "Future Impoundment & CCR Facility Improvements (Engineering)," and includes \$300,000 in capital expense for each of the years 2016 and 2017. Please explain why the costs for engineering work, which are normally considered to be expense, are being classified as capital.
10. Please refer to the table on page 4 of the petition.
- a. For each project, 1 – 6, please explain in detail how the associated annual project cost was derived.
 - b. For each project, 1 – 6, please provide a detailed breakdown of the component activities that comprise the estimated annual O&M costs and capital expenditures.
11. Please complete Table 1 below to provide the estimated residential customer bill impact resulting from all the compliance activities requested by TECO in its instant petition.

Table 1: Estimated Residential Customer Bill Impact

	¢ / 1,000 kWh	¢ / 1,200 kWh
2016		
2017		
2018		

Please file all responses electronically no later than Monday, December 21, 2015 from the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6187 if you have any questions.

Sincerely,

s/ Leslie Ames
Attorney
Leslie Ames

LAA/dml

cc: Office of Commission Clerk