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STATE OF FLORIDA



DIVISION OF ENGINEERING
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Public Service Commission

January 18, 2019

Mr. James D. Beasley
Tampa Electric Company
P.O. Box 391
Tallahassee, FL 32302
jbeasley@ausley.com

STAFF'S FIRST DATA REQUEST VIA EMAIL AND US MAIL

Re: Docket No. 20180231-EI – Petition for approval of the big bend south gypsum storage area closure project for cost recovery through the environmental cost recovery clause, by Tampa Electric Company.

Dear Mr. Beasley:

Commission staff has reviewed the Petition in Docket No. 20180231-EI filed by Tampa Electric Company (TECO or Company) and requests the following information from the Company. Please provide this information to the Office of Commission Clerk, 2540 Shumard Oak Blvd., Tallahassee, FL 32399-0850, by **February 5, 2019**.

1. Please refer to Paragraph 11 on page 5 of TECO's Petition. TECO states that, "there are concerns with the proximity of the bottom of the South Gypsum Storage Area (SGSA) to the water table in the area and the effect this will have on the long-term stability of the storage area."
 - a. Has TECO determined the distance between the bottom of the SGSA and the water table?
 - i. If so, what was the distance?
 - ii. If not, why has the distance not been determined?
 - b. Please provide the most recent groundwater and/or soil monitoring of the SGSA completed. How often is this monitoring conducted?
 - c. Are all environmental requirements being met at the SGSA? If not, are there currently any outstanding violations?
 - d. Are there any potential or current environmental concerns for the East Gypsum Storage Area (EGSA)? If so, please list the concerns and any actions taken to address the concerns.

2. Please refer to Paragraph 11 on page 5 of TECO's Petition. Please provide a list of the Appendix III and IV constituents.

3. Please refer to Paragraph 12 on page 5 of TECO Petition. The Petition states that TECO, “must close the facility, given its lack of usefulness, the ongoing risk of environmental impacts, and the applicability of CCR Rule compliance obligations and operating criteria.”
 - a. Please identify and provide the specific CCR Rule language that obligates TECO to close the SGSA at this time.
 - b. Please discuss, in detail, the specific ongoing environmental risks and their impacts if the SGSA is not closed.
4. Please refer to Paragraph 15 on page 6 of TECO’s Petition. What entity, TECO or its consultant(s), did the preliminary analysis? If an entity other than TECO was involved, please identify its name.
5. Please refer to Paragraph 15 on page 7 of the Petition. TECO indicated that it initiated the closure project in April 2018. Has TECO used a contractor for this project? If so, please identify the name and its responsible activities.
6. Please refer to Paragraph 15 on page 7 of TECO’s Petition. The SGSA Closure Project was initiated in April 2018. Why was the project not included in TECO’s Environmental Cost Recovery Clause cost recovery projections for 2019?
7. Please refer to Paragraph 16 on pages 6 and 7 of TECO’s Petition.
 - a. What was the estimated cost for the alternative “cap and close method” that was considered?
 - b. What was the estimated cost to remediate and maintain the SGSA, rather than closing the site? Why was this alternative rejected?
8. TECO indicated at Paragraph 19 on page 9 of the Petition, that capital expenditures are allocated to appropriate rate classes on a demand basis. Please identify all the capital activities referred in this Paragraph, if any, and specify the estimate of the capital expenditure amount associated with each.
9. Please provide a map or diagram to scale of the SGSA and the EGSA. Please include the two Gypsum storage areas and the Big Bend Units 1&2 in one diagram.

Please refer to Attachment A of the Petition for questions 10 – 15 below.

10. Please refer to activity “Excavation and Preparation of CCR Material for Processing, Sale, or Disposal” listed in Exhibit A of the Petition.
 - a. Please provide a breakdown of the Operations and Maintenance (O&M) expenditures for component activities (e.g., Excavation, Preparation) that comprise the estimated annual O&M costs.
 - b. Please specify whether TECO or its contractor will perform each of the component activities for 2019 and 2020.
 - c. For any contractor that has been retained, please identify its name and the services it will provide, as well as any associated cost for each activity component the contractor is providing.

- d. Please provide an explanation of whether the sales proceeds, if any, will be used to offset the expenditures of disposal and/or the entire closure project.
11. Please refer to activity “Additional Reprocessing Equipment & Maintenance” listed in Exhibit A of the Petition.
 - a. Please provide a breakdown of the O&M expenditures for component activities (e.g., Equipment, Maintenance) that comprise the estimated annual O&M costs.
 - b. Please provide an explanation of why the expenditure associated with the Reprocessing Equipment is categorized as an O&M cost.
 12. Refer to activity “Truck Fees” listed in Exhibit A of the Petition, please explain how each of the estimated annual O&M expenditure amount was established.
 13. Please refer to activity “Transportation and Disposal in Permitted Landfill Site Restoration” listed in Exhibit A of the Petition.
 - a. Please provide a breakdown of the O&M expenditures for component activities (e.g., Transportation, Disposal).
 - b. Please specify whether TECO or its contractor will perform each of the component activities for 2019 and 2020.
 - c. For any contractor that has been retained, please identify its name and the services it will provide, as well as any associated cost for each activity component the contractor is providing.
 14. Please refer to activity “Site Restoration” listed in Exhibit A of the Petition.
 - a. Please explain how each of the estimated annual O&M expenditure amounts was established, and provide the expenditure breakdown by activity.
 - b. Please specify whether TECO or its contractor will perform the activities for 2019 and 2020.
 - c. For any contractor that has been retained, please identify its name and the services it will provide, as well as any associated cost for each activity component the contractor is providing.
 15. Please refer to activity “Post-Closure Groundwater Monitoring” listed in Exhibit A of the Petition.
 - a. Please explain how each of the estimated annual O&M expenditure amounts was established, and provide the expenditure breakdown by activity.
 - b. Please specify whether TECO or its contractor will perform the activities for 2020 through 2023.
 - c. For any contractor that has been retained, please identify its name and the services it will provide, as well as any associated cost for each activity component the contractor is providing.

16. Please complete Table 1 below to provide the estimated residential customer bill impact resulting from all the activities requested by TECO in the instant Petition.

Table 1: Estimated Residential Customer Bill Impact

	¢ / 1,000 kWh	¢ / 1,200 kWh
2020		
2021		
2022		
2023		

Please refer to the following documents for question 17 below.

- i. Petition of Tampa Electric Company For Approval Of A New Environmental Program For Cost Recovery Through The Environmental Cost recovery Clause,” filed August 29, 2011, in Docket No. 20110262-EI.
- ii. Order PSC-12-0493-PAA-EI, issued September 26, 2012, in Docket No. 201120262-EI.
- iii. Petition of Tampa Electric Company For Approval Of A New Environmental Program For Cost Recovery Through The Environmental Cost recovery Clause,” filed October 15, 2015, in Docket No. 20150223-EI.
- iv. TECO’s instant Petition.

17. Please provide a drawing to show all the gypsum and coal ash storage facilities (ponds, storage area, etc.) at the Big Bend Station. Please also clearly mark out the locations of the following:

- a. The “Existing Storage Facility” and “Proposed New Storage Facility” described in document (i) (pages 11 and 12).
- b. The New Gypsum Storage approved in document (ii).
- c. The North Gypsum Stackout area discussed in document (iii).
- d. SGSA and EGSA discussed in document (iv).

If you have any questions, please contact Emily Knoblauch by phone at (850) 413-6632 or by email at eknoblau@psc.state.fl.us.

Sincerely,



Emily Knoblauch
Engineering Specialist

EM:pz

cc: Office of Commission Clerk (Docket No. 20180231-EI)