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July 2, 2020

VIA: ELECTRONIC FILING

Mr. Adam J. Teitzman Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: In re: Petition of Tampa Electric Company to True-Up First and Second SoBRAs Dkt. No. 20200144-EI

Dear Mr. Teitzman:

Attached for filing in the above docket is Tampa Electric Company's response to Staff's Second Data Request (Nos. 1-5), propounded on June 18, 2020.

Thank you for your assistance in connection with this matter.

Sincerely,

ethy Wahlen

JJW/bmp Attachment

cc: All Parties of Record (w/attachment)

FILED 7/2/2020 DOCUMENT NO. 03525-2020 FPSC - COMMISSION CLERK

TAMPA ELECTRIC COMPANY DOCKET NO. 20200144-EI STAFF'S SECOND DATA REQUEST REQUEST NO. 1 PAGE 1 OF 1 FILED: JULY 2, 2020

- 1. Please refer to witness Ward's direct testimony, page 13, lines 23 through page 14, line 2. Please provide the EPC cost variance for each of the items listed below for the Payne Creek Project. Please also provide the reason for the additional expense.
 - a. Breakage spares.
 - b. More durable roads.
- **A.** The EPC cost variance for the Payne Creek project was \$938,410. Please see below for the breakdown of the variance.
 - a. The cost variance associated with breakage spares was \$246,582. The variance was the result of module allowance to cover breakage of solar modules that occur during project construction. The "module allowance" was an agreed to value that accounted for modules broken during project construction. The module allowance is based on an industry value of 0.8% of the modules installed for the project.
 - b. The cost variance associated with more durable roads was \$384,986. The variance resulted from an additional 3-inches of crushed concrete for roads to improve road subgrade. The subgrade is the primary base of the road. This was necessary to bring the road grade higher.

The variances described above made up \$631,568 of the \$938,410 total variance. The remaining variance (\$306,842) resulted from several activities that included additional environmental consulting costs, additional project management and safety oversight, site security personnel, and equipment.

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- 2. Please refer to witness Ward's direct testimony, page 15, lines 7 through 15. Please provide the EPC cost variance for each of the items listed below for the Balm Project. Please also provide the reason for the additional expense.
 - a. More durable roads.
 - b. Retaining the Florida highway patrol.
- **A.** The EPC cost variance for the Balm Project was \$495,469. Please see below for the breakdown of the variance.
 - a. The cost variance associated with more durable roads was \$77,318. This variance resulted from additional crushed concrete and installation to allow for an improved design that would allow better access to the solar substation.
 - b. The cost variance associated with the retention of Florida Highway Patrol was \$36,665. This was to provide off-duty police assistance to allow for access and egress to the site. SR-672 is a busy highway and presented a safety concern with vehicles accessing the site. The patrol car warned through traffic of the slow-moving vehicles entering and existing the site.

The variances described above made up \$113,983 of the \$495,469 total variance. The remaining variance (\$381,486) resulted from several activities that included additional environmental consulting costs, additional project management and safety oversight, site security, engineering, and design costs that resulted in replacing the original engineering firm, site testing and remediation.

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- **3.** Please refer to witness Ward's direct testimony, page 23, lines 19 through 22. Please provide the Owners cost variance for each of the items listed below for the Lithia Project. Please also provide the reason for the additional expense.
 - a. Relocation of gopher tortoises.
 - b. Site management.
 - c. Safety oversight.
- A. The Owner's cost variance for the Lithia Project was \$650,184. Please see below for the breakdown of the variance. Tampa Electric received credits for minor items that offset some of the cost variance, resulting in the total cost variance of \$650,184.
 - a. The cost variance of \$310,000 was due to the atypical amount of gopher tortoise burrows at project site. More than 200 gopher tortoises were found in burrows and relocated.
 - b. The cost variance of \$361,000 was due to construction and safety supervision at site.

Each project required Tampa Electric project management and safety oversight. The project management oversight included daily quality control and general construction on-site review to ensure each project was built to the approved design. The company's safety oversight was required to ensure that contractors were following the company's safety policies and practices. The cost variance for safety oversight was primarily due to the hiring of additional safety personnel that were not part of the original project scopes, after early experiences with a number of safety incidents on the first projects.

c. Please see response 3(b) above.

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- 4. Please refer to witness Ward's direct testimony, page 28 lines 17 through 23. Please provide the Owner cost variance for each of the items listed below for the Lake Hancock Project. Please also provide the reason for the additional expense.
 - a. Vegetation buffer.
 - b. Safety managers.
- **A.** The Owner's cost variance for the Lake Hancock Project is \$1,020,143. Please see below for the breakdown of the variance.
 - a. The cost variance associated with the vegetation buffer was \$986,281. The variance was the result of the City of Bartow requiring a berm and vegetation buffer to make the solar project less visible to neighboring residents.
 - b. The cost variance associated with safety management was \$33,862. The variance was due to additional staff required to oversee contractor safety.

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- **5.** Please explain the reason for the Owner's cost variance associated with project management and safety oversight for each project.
- A. Each project required Tampa Electric project management and safety oversight. The project management oversight included daily quality control and general construction on-site review to ensure each project was built to the approved design. The company's safety oversight was required to ensure that contractors were following the company's safety policies and practices. The cost variance for safety oversight was primarily due to the hiring of additional safety personnel that were not part of the original project scopes, after early experiences with a number of safety incidents on the first projects.