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# Public Service Commission

August 25, 2021

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**STAFF'S FOURTH DATA REQUEST**  
*VIA EMAIL*

Re: Docket No. 20210034-EI – Petition for rate increase by Tampa Electric Company

Docket No. 20200264-EI – Petition for approval of 2020 depreciation and dismantlement study and capital recovery schedules, by Tampa Electric Company.

Greetings:

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

1. Please refer to the direct testimony of Jose Aponte, page 12, lines 6 through 20. Please describe the forecast methodology underlying TECO's Future Solar forecast, including how the Company's demand energy, fuel price, and emissions costs/prices were utilized in TECO's cost effectiveness calculations.
2. Please refer to the direct testimony of Jose Aponte, page 12, lines 6 through 20. Please list all FPSC filings in which TECO presented the same demand energy, fuel price, and emissions costs/prices forecasts that were utilized in TECO's Future Solar cost effectiveness analysis and explain how they were used in those dockets or otherwise by the Commission.
3. Please list all FPSC dockets which were open after August 2020 in which TECO filed demand energy, fuel price, and emissions costs/prices forecasts which were different

from the forecasts utilized in TECO's Future Solar cost effectiveness analysis. Explain in each instance, if any, why a different forecast was used and how those forecasts differed from those in the instant case.

4. Please refer to the direct testimony of Brent Caldwell, page 16, lines 4 through 16. Please briefly describe the forecast methodology underlying TECO's Big Bend Modernization forecast, including how the Company's demand energy, fuel price, and emissions costs/prices forecasts were utilized to determine cost effectiveness.
5. Please refer to the direct testimony of Brent Caldwell, page 16, lines 4 through 16. In determining revenue requirement comparisons between options,:
  - a. Why did the Company rely upon inputs (forecasts) from four years ago in its analysis in the instant case?
  - b. How much have those inputs changed since 2017?
  - c. What is the likely impact of using data which have changed in the interim?
6. Please refer to the direct testimony of Brent Caldwell, page 16, lines 4 through 16. Please list all FPSC filings in which TECO presented the same demand energy, fuel price, and emissions costs/prices forecasts that were utilized in TECO's Big Bend Modernization cost effectiveness analysis and explain how they were used in dockets or otherwise by the Commission.
7. Please list all FPSC dockets which were open after August 2020 in which TECO filed demand and energy, fuel price, emissions costs/prices forecasts which were different from the forecasts utilized in TECO's Big Bend Modernization cost effectiveness analysis. Explain in each instance, if any, why a different was used and how those forecasts differed from those in the instant case.
8. Please refer to the direct testimony of Brent Caldwell, page 34, lines 16 through 22. Please briefly describe the forecast methodology underlying TECO's forecast for the early retirement of Big Bend Unit 3, including how the Company's demand and energy, fuel price, emissions costs/prices forecasts were utilized.
9. Please refer to the direct testimony of Brent Caldwell, page 34, lines 16 through 22. Please list all FPSC filings in which TECO presented the same demand and energy, fuel price, emissions costs/prices forecasts that were utilized in TECO's cost effectiveness

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analysis for the early retirement of Big Bend Unit 3 and explain how they were used in dockets or otherwise by the Commission.

10. What is the developmental schedule for each updated and/or scheduled TECO demand and energy, fuel price, emissions costs/prices forecasts subsequent to the forecasts filed in this proceeding?
11. Please provide the forecasts that were used by TECO for all FPSC dockets which were open after August 2020 in which TECO filed demand and energy, fuel price, and emission costs/prices forecasts which were different from the forecasts utilized in TECO's cost effectiveness analysis for the early retirement of Big Bend Unit 3.
12. Please provide the forecasts that were used by TECO for all FPSC dockets which were open after August 2020 in which TECO filed demand and energy, fuel price, and emission costs/prices forecasts which were different from the forecasts utilized in TECO's Big Bend Modernization cost effectiveness analysis.

Please file all responses electronically no later than Wednesday, September 1, 2021, via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6191 if you have any questions.

Respectfully,

*/s/ Charles W. Murphy*

Charles W. Murphy  
Senior Attorney

CWM/csc

cc: Office of Commission Clerk  
All Parties of Record