

COMMISSIONERS:
GARY F. CLARK, CHAIRMAN
ART GRAHAM
ANDREW GILES FAY
MIKE LA ROSA
GABRIELLA PASSIDOMO

STATE OF FLORIDA



OFFICE OF THE GENERAL COUNSEL
KEITH C. HETRICK
GENERAL COUNSEL
(850) 413-6199

Public Service Commission

August 25, 2021

James D. Beasley/J. Jeffry Wahlen/
Malcolm N. Means
Ausley McMullen
Post Office Box 391
Tallahassee, FL 32302
jbeasley@ausley.com
jwahlen@ausley.com
mmeans@ausley.com

STAFF'S SIXTH 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 provide MFR schedule A-2 for 2022, bill comparisons for typical monthly bills, comparing bills under present rates and bills under the proposed Settlement rates. The cost recovery factors for present and proposed bills should be the same currently approved factors.
2. Please provide an MFR schedule E-8 showing how the 2022 Settlement increase was allocated to the rate classes.
3. Please state the 1,000 kilowatt hour residential bill under a) the MFR rates as originally proposed and b) under the proposed Settlement rates for 2022. Show all charges and bill components separately.

4. Referring to paragraph 6(d) of the Settlement, and the use of the 4 Coincident Peak (CP) methodology for allocating production and transmission plant, please respond to the following questions:
 - a. Discuss and explain why the Settlement includes the 4 CP methodology as opposed to the 12 CP and 1/13 Average Demand (AD) methodology for production as included in the original MFRs.
 - b. Discuss and explain why the Settlement includes the 4 CP methodology as opposed to the 12 CP methodology for transmission as included in the original MFRs.
 - c. State which three summer and which one winter month are being used to allocate production and transmission costs and explain why those particular months were chosen.
 - d. Discuss whether TECO designs and provides generation and transmission capacity needs for twelve months of the year or just four months of the year.
 - e. Are transmission costs to wholesale customers allocated on a 12 CP or 4 CP methodology? If on a 12 CP methodology, wouldn't the proposed 4 CP methodology create a mismatch between the retail and wholesale jurisdiction?
 - f. Discuss which rate classes (residential/small commercial vs. larger commercial/industrial) are negatively impacted by the proposed 4 CP methodology (when compared to the methodology used in the MFRs), by shifting target revenue requirements to the rate class away from other rate classes.
 - g. Discuss why the Settlement includes a provision that in the next general base rate proceeding, the filed cost-of-service study will use the 4 CP cost allocation.
 - h. Clarify whether in the next general base rate proceeding, TECO will only include the 4 CP cost of service methodology, or the 4CP and 12 CP and 1/13 AD methodology.
 - i. Explain who are the "Precluded Parties" and why would an affiliate of TECO oppose the 4 CP and full MDS.
5. Referring to paragraph 6(d) of the Settlement, and the use of the full Minimum Distribution System (MDS) methodology for allocating distribution plant costs, please respond to the following questions:

Staff's Sixth Data Request

Page 3

August 25, 2021

- a. Discuss and explain why the Settlement includes the full MDS methodology as opposed to incorporating one-half of the MDS methodology as described in Witness Vogt's direct testimony on Page 26, Lines 1-18.
 - b. Explain in detail the difference between the full MDS and the one-half of the MDS methodology.
 - c. Please discuss which rate classes (residential/small commercial vs. larger commercial/industrial) are negatively impacted by the proposed full MDS methodology compared to the methodology used in the MFRs, by shifting target revenue requirements to the rate class away from other rate classes.
6. Please provide a comparison, using the 2022 revenue increase proposed in the Settlement, showing what target revenue requirements for each rate class would be under the cost of service used in the MFRs (12 CP and 1/13 AD, one-half of the MDS methodology) vs. the Settlement. Also, show the target revenue requirements difference in dollars and percent difference.
 7. Please calculate and state the residential basic service charge and base energy charges if the Settlement increase for 2022 had been based on the cost of service methodology as used in the MFRs (12 CP and 1/13 AD, one-half of the MDS methodology).
 8. Referring to Exhibit K of the Settlement, please provide the same table with a column added for each year to show the increase in percent to the rate classes and explain how the GBRA year 2 and year 3 increases were allocated to the rate classes.

Please file all responses electronically no later than Wednesday, September 1, 2021, via 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) 413-6191 if you have any questions.

Respectfully,

/s/ Charles W. Murphy

Charles W. Murphy
Senior Attorney

CWM/nah

cc: Office of Commission Clerk
 All Parties of Record