

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost )  
Recovery Clause. )  
\_\_\_\_\_ )

DOCKET NO. 20240010-EI  
FILED: July 31, 2024

**PREHEARING STATEMENT  
OF TAMPA ELECTRIC COMPANY**

**APPEARANCES**

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On behalf of Tampa Electric Company

**(1) WITNESSES**

<b>Witness</b>	<b>Subject Matter</b>	<b>Issue #</b>
<b>Direct</b>		
M. Ashley Sizemore	Storm Protection Plan Cost Recovery True-Up and Projection	1-10
C. David Sweat	Storm Protection Plan Cost Recovery True-Up and Projection	1-10

**(2) EXHIBITS**

<b>Witness</b>	<b>Proffered By</b>	<b>Exhibit No.</b>	<b>Description</b>	<b>Issue #</b>
<b>Direct</b>				
M. Ashley Sizemore	Tampa Electric Company	MAS-1; A-Schedules, filed April 1, 2024	Schedules Supporting Storm Protection Cost Recovery Factor, Actual for the period January 2023 – December 2023	1-10

M. Ashley Sizemore	Tampa Electric Company	MAS-2; E-Schedules, filed May 1, 2024; revised July 26, 2024.	Schedules supporting cost recovery amount, projected January 2024-December 2024	1-10
M. Ashley Sizemore	Tampa Electric Company	MAS-2.; P-Schedules, filed May 1, 2024; revised July 26, 2024	Schedules supporting costs recovery amount, projected for the period January 2025–December 2025, Projected - Current	1-10
M. Ashley Sizemore	Tampa Electric Company	MAS-3; P-Schedules, filed May 1, 2024; revised July 26, 2024	Schedules supporting costs recovery amount, projected for the period January 2025–December 2025, Projected - Proposed	1-10
C. David Sweat	Tampa Electric Company	CDS-1 filed April 1, 2024	Tampa Electric Company, 2023 Storm Protection Plan Accomplishments	1-10
C. David Sweat	Tampa Electric Company	CDS-2 filed May 1, 2024	Project List and Summary of Costs	1-10

**(3) STATEMENT OF BASIC POSITION**

Tampa Electric’s Statement of Basic Position:

In Order No. PSC-2022-0386-FOF-EI, issued November 10, 2022, the Commission found that Tampa Electric’s 2022-2031 Storm Protection Plan (“2022 SPP”) is in the public interest and approved that plan with one modification – elimination of the company’s existing Transmission Access Enhancement Program as of December 31, 2022.

The Commission is currently scheduled to conduct a hearing regarding the Storm Protection Cost Recovery Clause on September 25, 2024, to review and approve the proposed cost recovery factors to be used for the January 2025 through December 2025 period.

The Commission should determine that Tampa Electric has properly calculated its Storm Protection Plan cost recovery true-up and projections and the Storm Protection Plan cost recovery factors set forth in the testimony and exhibits of witness M. Ashley Sizemore during the period January 2025 through December 2025. These calculations were performed in accordance with the requirements of Section 366.96 of the Florida Statutes and Rule 25-6.031 of the Florida Administrative Code. No party has challenged or made any other recommended adjustments to the company's calculations. The company's true-up, projections, and factors should accordingly be approved. The Commission should also find that Tampa Electric's actual 2023 Storm Protection Plan costs were prudently incurred. No party has challenged the prudence of Tampa Electric's actual incurred costs or made any recommended adjustments to any of the projects or costs included in the 2023 final true-up.

**(4) STATEMENT OF ISSUES AND POSITIONS**

**GENERIC STORM PROTECTION PLAN COST RECOVERY ISSUES**

**ISSUE 1A:** What jurisdictional amounts should the Commission approve as FPL's final 2023 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**TECO:** No Position.

**ISSUE 1B:** What jurisdictional amounts should the Commission approve as TECO’s final 2023 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**TECO:** The Commission should approve final Storm Protection Plan Cost Recovery Clause prudently incurred jurisdictional revenue requirements of \$70,079,782 and a jurisdictional cost recovery true-up under-recovery amount of \$3,515,100 for the period January 2023 through December 2023 including interest.  
(Witness: Sizemore, Sweat)

**ISSUE 1C:** What jurisdictional amounts should the Commission approve as the FPUC’s final 2023 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**TECO:** No Position.

**ISSUE 1D:** What jurisdictional amounts should the Commission approve as the DEF’s final 2023 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**TECO:** No Position.

**ISSUE 2A:** What jurisdictional amounts should the Commission approve as the FPL’s reasonably estimated 2024 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**TECO:** No Position.

**ISSUE 2B:** What jurisdictional amounts should the Commission approve as TECO’s reasonably estimated 2024 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

TECO: The Commission should approve actual/estimated Storm Protection Plan Cost Recovery Clause jurisdictional revenue requirements of \$90,297,357 and a jurisdictional estimated cost recovery true-up under-recovery amount of \$606,964 for the period January 2024 through December 2024 including interest.  
(Witness: Sizemore, Sweat)

**ISSUE 2C:** What jurisdictional amounts should the Commission approve as FPUC’s reasonably estimated 2024 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

TECO: No Position.

**ISSUE 2D:** What jurisdictional amounts should the Commission approve as DEF’s reasonably estimated 2024 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

TECO: No Position.

**ISSUE 3A:** What jurisdictional amounts should the Commission approve as FPL’s reasonably projected 2025 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

TECO: No Position.

**ISSUE 3B:** What jurisdictional amounts should the Commission approve as TECO’s reasonably projected 2025 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

TECO: The Commission should approve reasonably projected Storm Protection Plan Cost Recovery Clause jurisdictional revenue requirements of \$116,458,022 (Projected –

Current) or \$125,421,133 (Projected – Proposed) for the period January 2025 through December 2025.

(Witness: Sizemore, Sweat)

**ISSUE 3C:** What jurisdictional amounts should the Commission approve as FPUC’s reasonably projected 2025 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**TECO:** No Position.

**ISSUE 3D:** What jurisdictional amounts should the Commission approve as DEF’s reasonably projected 2025 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

**TECO:** No Position.

**ISSUE 4A:** What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2025 Storm Protection Plan Cost Recovery factors for FPL?

**TECO:** No Position.

**ISSUE 4B:** What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2025 Storm Protection Plan Cost Recovery factors for TECO?

**TECO:** The Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing Storm Protection Plan Cost Recovery factors for the period January 2025 through December 2025 is \$117,524,083 (Projected – Current) or \$126,487,194 (Projected – Proposed).

(Witness: Sizemore, Sweat)

**ISSUE 4C:** What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2025 Storm Protection Plan Cost Recovery factors for FPUC?

**TECO:** No Position.

**ISSUE 4D:** What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2025 Storm Protection Plan Cost Recovery factors for DEF?

**TECO:** No Position.

**ISSUE 5A:** What depreciation rates should be used to develop the depreciation expense included in the total 2025 Storm Protection Plan Cost Recovery Clause amounts for FPL?

**TECO:** No Position.

**ISSUE 5B:** What depreciation rates should be used to develop the depreciation expense included in the total 2025 Storm Protection Plan Cost Recovery Clause amounts for TECO?

**TECO:** The depreciation rates from Tampa Electric's most current Depreciation Study, approved by Order No. PSC-2021-0423-S-EI issued November 10, 2021, within Docket No. 20210034-EI, should be and were used to develop the depreciation expense included in the total Storm Protection Plan Cost Recovery Clause amounts for 2025, Projected – Current.

The depreciation rates from Tampa Electric’s proposed Depreciation Study, submitted on December 27, 2023, within Docket No. 20230139-EI were used to develop the depreciation expense included in the total Storm Protection Plan Cost Recovery Clause amounts for 2025, Projected – Proposed.

(Witness: Sizemore, Sweat)

**ISSUE 5C:** What depreciation rates should be used to develop the depreciation expense included in the total 2025 Storm Protection Plan Cost Recovery Clause amounts for FPUC?

**TECO:** No Position.

**ISSUE 5D:** What depreciation rates should be used to develop the depreciation expense included in the total 2025 Storm Protection Plan Cost Recovery Clause amounts for DEF?

**TECO:** No Position.

**ISSUE 6A:** What are the appropriate 2025 jurisdictional separation factors for FPL?

**TECO:** No Position.

**ISSUE 6B:** What are the appropriate 2025 jurisdictional separation factors for TECO?

**TECO:** The appropriate jurisdictional separation factors are as follows:

FPSC Jurisdictional Factor: 93.5213%

FERC Jurisdictional Factor: 6.4787%

(Witness: Sizemore, Sweat)



**ISSUE 6C:** What are the appropriate 2025 jurisdictional separation factors for FPUC?

TECO: No Position.

**ISSUE 6D:** What are the appropriate 2025 jurisdictional separation factors for DEF?

TECO: No Position.

**ISSUE 7A:** What are the appropriate 2025 Storm Protection Plan Cost Recovery Clause factors for each rate class for FPL?

TECO: No Position.

**ISSUE 7B:** What are the appropriate 2025 Storm Protection Plan Cost Recovery Clause factors for each rate class for TECO?

TECO: The appropriate January 2025 through December 2025 cost recovery clause factors utilizing the appropriate recognition of Federal Energy Regulatory Commission transmission jurisdictional separation, revenue tax factors and the rate design and cost allocation as put forth in Docket No. 20210034-EI are as follows:

<b><u>Rate Schedule</u></b>	<b><u>Cost Recovery Factors</u></b> <b><u>(cents per kWh)</u></b>
RS	0.838
GS and CS	1.040
GSD Optional – Secondary	0.188
GSD Optional – Primary	0.186
GSD Optional – Subtransmission	0.184
LS-1, LS-2	5.246

**Cost Recovery Factors**

<b><u>Rate Schedule</u></b>	<b><u>(dollars per kW)</u></b>
GSD – Secondary	0.77
GSD – Primary	0.76
GSD – Subtransmission	0.76
SBD – Secondary	0.77
SBD – Primary	0.76
SBD – Subtransmission	0.76
GSLD - Primary	0.64
GSLD - Subtransmission	0.15

The appropriate January 2025 through December 2025 cost recovery clause factors utilizing the appropriate recognition of Federal Energy Regulatory Commission transmission jurisdictional separation, revenue tax factors and the rate design and cost allocation as proposed within Docket No. 20240026-EI are as follows:

**Cost Recovery Factors**

<b><u>Rate Schedule</u></b>	<b><u>(cents per kWh)</u></b>
RS	0.906
GS and CS	1.132
GSD Optional – Secondary	0.194
GSD Optional – Primary	0.192
GSD Optional – Subtransmission	0.190
LS-1, LS-2	5.785

**Cost Recovery Factors**

<b><u>Rate Schedule</u></b>	<b><u>(dollars per kW)</u></b>
GSD – Secondary	0.80

GSD – Primary	0.79
GSD – Subtransmission	0.78
SBD – Secondary	0.80
SBD – Primary	0.79
SBD – Subtransmission	0.78
GSLD - Primary	0.66
GSLD - Subtransmission	0.16

(Witness: Sizemore, Sweat)

**ISSUE 7C:** What are the appropriate 2025 Storm Protection Plan Cost Recovery Clause factors for each rate class for FPUC?

**TECO:** No Position.

**ISSUE 7D:** What are the appropriate 2025 Storm Protection Plan Cost Recovery Clause factors for each rate class for DEF?

**TECO:** No Position.

**ISSUE 8A:** What should be the effective date of the 2025 Storm Protection Plan Cost Recovery Clause factors for billing purposes for FPL?

**TECO:** No Position.

**ISSUE 8B:** What should be the effective date of the 2025 Storm Protection Plan Cost Recovery Clause factors for billing purposes for TECO?

**TECO:** The effective date of the new Storm Protection Plan Cost Recovery Clause factors should be January 1, 2025.

(Witness: Sizemore, Sweat)

**ISSUE 8C:** What should be the effective date of the 2025 Storm Protection Plan Cost Recovery Clause factors for billing purposes for FPUC?

**TECO:** No Position.

**ISSUE 8D:** What should be the effective date of the 2025 Storm Protection Plan Cost Recovery Clause factors for billing purposes for DEF?

**TECO:** No Position.

**ISSUE 9A:** Should the Commission approve revised tariffs reflecting the 2025 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for FPL?

**TECO:** No Position.

**ISSUE 9B:** Should the Commission approve revised tariffs reflecting the 2025 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for TECO?

**TECO:** Yes, the Commission should approve revised tariffs reflecting the new Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding.

(Witness: Sizemore, Sweat)

**ISSUE 9C:** Should the Commission approve revised tariffs reflecting the 2025 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for FPUC?

TECO: No Position.

**ISSUE 9D**: Should the Commission approve revised tariffs reflecting the 2025 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for DEF?

TECO: No Position.

**ISSUE 10**: Should this docket be closed?

TECO: No. The storm protection plan cost recovery clause is a continuing docket and should remain open until a new docket number is assigned next year.  
(Witness: Sizemore, Sweat)

**OPC Proposed Company-Specific Issues**

None at this time.

**(5) STIPULATED ISSUES**

Tampa Electric is not aware of any stipulated issues as of this date.

**(6) PENDING MOTIONS**

Tampa Electric is not aware of any pending motions as of this date.

**(7) PENDING CONFIDENTIALITY CLAIMS OR REQUESTS**

Tampa Electric has filed the following requests for confidential classification (“RCC”) and motions for temporary protective orders (“MTPO”) and they are currently pending:

<b>Date Filed</b>	<b>Type</b>	<b>Subject Matter</b>
May 6, 2024	RCC & MTPO	OPC’s First IRR (Nos. 1-3) and OPC’s First POD (Nos. 1-2)

**(8) OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT**

Tampa Electric has no objections to any witness' qualifications as an expert in this proceeding.

**(9) STATEMENT OF SEQUESTRATION OF WITNESSES**

Tampa Electric does not request the sequestration of any witnesses at this time.

**(10) COMPLIANCE WITH ORDER NO. PSC-2024-0032-PCO-EI**

Tampa Electric has complied with all requirements of the Order Establishing Procedure, the First Modified Order Establishing Procedures, and the Second Modified Order Establishing Procedure. Order Nos. PSC-2024-0032-PCO-EI, PSC-2024-0110-PCO-EI, and PSC-2024-0216-PCO-EI entered in this docket, respectively.

DATED this 31<sup>st</sup> day of July, 2024.

Respectfully submitted,



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ATTORNEYS FOR TAMPA ELECTRIC COMPANY

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Prehearing Statement, filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 31<sup>st</sup> day of July 2024 to the following:

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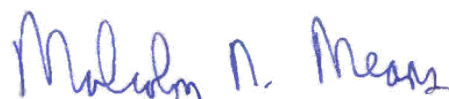
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