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April 21, 2020

VIA: ELECTRONIC FILING

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

**Re: Dkt. 20200091-EU – Proposed Amendment of Rule 25-6.064, F.A.C.,
Contributions-in-Aid of Installation of New or Upgraded Facilities**

Dear Mr. Teitzman:

Enclosed is Tampa Electric Company's response to SERC, Staff's First Data Request dated April 7, 2020 regarding internal documentation for the calculation of contributions-in-aid of installation of new or upgraded facilities.

Sincerely,



James D. Beasley

JDB/bmp
Enclosure

cc: Sevini Guffey, Public Utility Analyst II

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20200091-EU
STAFF'S FIRST DATA REQUEST
REQUEST NO. 1
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1. Recommended revision to Section (5) of Rule 25-6.064, F.A.C., states that new or upgraded overhead and underground facility costs applied to the formula in subsections (2) and (3) of Rule 25-6.064, F.A.C., should be based on the requirements of Rule 25- 6.030, F.A.C., Storm Protection Plan, Rule 25-6.034, F.A.C., Standard of Construction, Rule 25-6.0341, F.A.C., Location of the Utility's Electric Distribution Facilities, and Rule 25-6.0345, FAC., Safety Standards for Construction of New Transmission and Distribution Facilities. Would the above requirements:
 - a. Increase Tampa Electric Company's (TECO) regulatory costs in excess of \$200,000 in the aggregate within one year after implementation of the rule?
 - b. Reduce TECO's regulatory costs?
 - c. Increase TECO'S transactional costs (such as filing fees, license fees, cost of equipment required to be installed/used, procedures required to comply with rule requirements, additional operating costs, monitoring and/or reporting costs, and any other costs necessary to comply with the rule) in excess of \$200,000 in the aggregate within one year after implementation of the rule?
 - d. Please describe typical types of transactional costs that would be incurred by TECO to implement the proposed revision to Section (5) of Rule 25-6.064, F.A.C.
 - e. Please provide an explanation for the estimated transactional costs and methodology used.
 - f. Would the proposed revision to Section (5) of Rule 25-6.064, F.A.C., have any adverse or positive impacts on small businesses, small cities, or small counties defined in Chapter 120.541(2)(e), F.S.?
- A.**
- a. No.
 - b. No.
 - c. No.
 - d. None.

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- e. N/A.
- f. None that Tampa Electric Company can identify at this time.

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2. Recommended revision to Section (2) of Rule 25-6.078, F.A.C., states that for the purpose of calculating the Estimated Average Cost Differential, cost estimates should reflect the requirements of Rule 25-6.030, F.A.C., Storm Protection Plan, Rule 25-6.034, F.A.C., Standard of Construction, Rule 25-6.0341, F.A.C., Location of the Utility's Electric Distribution Facilities, and Rule 25-6.0345, F.A.C., Safety Standards for Construction of New Transmission and Distribution Facilities. Would the above requirements:
- a. Increase TECO's regulatory costs in excess of \$200,000 in the aggregate within one year after implementation of the rule?
 - b. Increase TECO's transactional costs (such as filing fees, license fees, cost of equipment required to be installed/used, procedures required to comply with rule requirements, additional operating costs, monitoring and/or reporting costs, and any other costs necessary to comply with the rule) in excess of \$200,000 in the aggregate within one year after implementation of the rule?
 - c. Please provide typical types of transactional costs that would be incurred by TECO to implement the proposed revision to Section (2) of Rule 25-6.078, F.A.C.
 - d. Please provide an explanation for the estimated transactional costs and methodology used.
 - e. Would the proposed revision to Section (2) of Rule 25-6.078, F.A.C., have any adverse or positive impacts on small businesses, small cities, or small counties defined in Chapter 120.541(2)(e), F.S.?
- A.
- a. No.
 - b. No.
 - c. None.
 - d. N/A.
 - e. None that Tampa Electric Company can identify at this time.

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3. Recommended revisions to Section (8)(a) of Rule 25-6.115, F.A.C., states that, the charge for the proposed underground facilities shall include: The estimated cost of construction of the underground distribution facilities based on the requirements of Rule 25-6.030 Storm Protection Plan, F.A.C., Rule 25-6.034, F.A.C., Standard of Construction, Rule 25-6.0341, F.A.C., Location of the Utility's Electric Distribution Facilities, and Rule 25-6.0345, F.A.C., Safety Standards for Construction of New Transmission and Distribution Facilities, including the construction cost of the underground service lateral(s) to the meter(s) of the customer(s); Would the above requirements:
- a. Increase TECO's regulatory costs in excess of \$200,000 in the aggregate within one year after implementation of the rule?
 - b. Reduce TECO's regulatory costs pursuant to the proposed revisions as opposed to the existing requirements? Please explain.
 - c. Increase TECO's transactional costs (such as filing fees, license fees, cost of equipment required to be installed/used, procedures required to comply with rule requirements; additional operating costs, monitoring and/or reporting costs, and any other costs necessary to comply with the rule) in excess of \$200,000 in the aggregate within one year after implementation of the rule?
 - d. Please describe typical types of transactional costs that would be incurred by TECO to implement the proposed revision to Section (8)(a) of Rule 25-6.115, F.A.C.
 - e. Please provide an explanation for the estimated transactional costs and methodology used.
 - f. Would the proposed revision to Section (8)(a) of Rule 25-6.115, F.A.C., have any adverse or positive impacts on small businesses, small cities, or small counties defined in Chapter 120.541(2)(e), F.S.?
- A.
- a. No.
 - b. No.
 - c. No.

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- d. None.
- e. N/A.
- f. None that Tampa Electric Company can identify at this time.

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4. Recommended revisions to Section (9) of Rule 25-6.115, F.A.C., states that, the charge for overhead facilities shall be the estimated construction cost to build new overhead facilities, including the service drop(s) to the meter(s) of the customer(s). Estimated construction costs shall be based on the requirements of Rule 25-6.030 Storm Protection Plan, F.A.C., Rule 25-6.034, F.A.C., Standard of Construction, Rule 25-6.0341, F.A.C., Location of the Utility's Electric Distribution Facilities, and Rule 25-6.0345, F.A.C., Safety Standards for Construction of New Transmission and Distribution Facilities. Would the above requirements:
- a. Increase TECO's regulatory costs in excess of \$200,000 in the aggregate within one year after implementation of the rule?
 - b. Reduce TECO'S regulatory costs pursuant to the proposed revisions as opposed to the existing requirements? Please explain.
 - c. Increase TECO's transactional costs (such as filing fees, license fees, cost of equipment required to be installed/used, procedures required to comply with rule requirements, additional operating costs, monitoring and/or reporting costs, and any other costs necessary to comply with the rule) in excess of \$200,000 in the aggregate within one year after implementation of the rule?
 - d. Please describe typical types of transactional costs that would be incurred by TECO to implement the proposed revision to Section (9) of Rule 25-6.115, F.A.C.
 - e. Please provide an explanation for the estimated transactional costs and methodology used.
 - f. Would the proposed revision to Section (9) of Rule 25-6.115, F.A.C., have any adverse or positive impacts on small businesses, small cities, or small counties defined in Chapter 120.541(2)(e), F.S.?
- A.
- a. No.
 - b. No.
 - c. No.

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- d. None.
- e. N/A.
- f. None that Tampa Electric Company can identify at this time.