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# Public Service Commission

August 26, 2021

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

**Re: Docket No. 20210107-EI – Petition for limited proceeding to true-up third SoBRA, 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 Prepared Direct Testimony of Tampa Electric Company (TECO) witness Jeffery S. Chronister, Exhibit No. JSC-1, Page 1 of 4.<sup>1</sup> Please provide a work paper detailing the derivation of the amounts appearing on line (1) for the months of January, February, and March of 2020.
2. Please refer to the Direct Testimony of TECO witness Chronister, Exhibit No. JSC-1, Page 1 of 4 for the following questions:
  - a. Regarding the “Total Installed Cost True up” appearing on lines (1) and (10), do these amounts represent the monthly difference between the estimated and actual revenue requirements (specifically related to capital cost differences) associated with the two solar facilities representing TECO’s 3<sup>rd</sup> Solar Base Rate Adjustment (SoBRA)? Please explain.
  - b. Are the estimated revenue requirements associated with the two solar facilities representing TECO’s 3<sup>rd</sup> SoBRA less than the actual revenue requirements being proposed for recovery/true up in this proceeding?

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<sup>1</sup>Document No. 04308-2021.

- c. If the responses to subparts a. and b. are yes, for the month of January 2020, why was only the estimated amount of revenue incorporated into the true up (line 1) given the estimated revenue requirement is below or less than the actual revenue requirement?
3. Please refer to the Direct Testimony of TECO witness Chronister, page 10, lines 5-15. Beginning on line 10, the witness testifies: “[o]n Page 4 of my exhibit, I provide the calculation of adjusted monthly true-up amounts to reflect the project in-service dates. The adjustment is calculated using the actual in-service dates and the daily average for the difference between estimated and actual annual revenue requirement for each project.” Please explain how for the month of January 2020, the “adjusted monthly true-up amount” incorporates “the difference between estimated and actual annual revenue requirement for each project” to arrive at a zero installed cost true-up amount (for January 2020) as indicated on Exhibit No. JSC-1, Page 1 of 4, line (1).
4. Please refer to the Direct Testimony of TECO witness Chronister, Exhibit No. JSC-1, Pages 1 and 4 of 4, filed in Docket No. 2020144-EI, and Exhibit No. JSC-1, Pages 1 and 4 of 4, filed in Docket No. 20210107-EI for the following questions:<sup>2</sup>
  - a. Concerning Exhibit No. JSC-1, Page 4 of 4, filed in Docket No. 2020144-EI, please explain why the values appearing on lines (13) and (22) correspond exactly to the amounts appearing on Exhibit No. JSC-1, Page 1 of 4, line (1), while for conceptually similar information presented in Docket No. 20210107-EI, the amounts appearing on line (10) of Exhibit No. JSC-1, Page 4 of 4 (filed in Docket No. 20210107-EI) presumably only serve “as a reasonableness check for the amounts on Page 1.”<sup>3</sup>
  - b. Regarding the values/analysis appearing on Exhibit No. JSC-1, Page 4 of 4, serving as a “reasonableness check” for the values appearing on Exhibit No. JSC-1, Page 1 of 4 (Docket No. 20210107-EI), please fully explain how TECO determines “reasonableness” in this context.

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<sup>2</sup>Document Nos. 02326-2020 and 04308-2021, respectively.

<sup>3</sup>TECO’s response to an informal staff data request via email, provided on 8/24/2021.

Staff's Second Data Request

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Please file all responses electronically no later than Thursday, September 9, 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) 413-6584 if you have any questions.

Respectfully,

Walt L. Trierweiler  
Senior Attorney

WLT/mgm

cc: Office of Commission Clerk  
All Parties of Record