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STATE OF FLORIDA



DIVISION OF ECONOMICS  
JUDY HARLOW  
DIRECTOR  
(850) 413-6410

# Public Service Commission

September 23, 2021

James D. Beasley, Esq.  
J. Jeffrey Wahlen, Esq.  
Malcolm N. Means, Esq.  
Ausley & McMullen  
Post Office Box 391  
Tallahassee, FL 32302

**Re: Docket No. 20210064 - Petition for approval of revised underground residential distribution tariffs, by Tampa Electric Company.**

Dear Mr. Beasley, Mr. Wahlen, and Mr. Means:

By this letter, Commission staff respectfully requests Tampa Electric Company (TECO or Company) provide responses to the following data requests to the above referenced docket.

1. Referring to TECO's supplemental response No. 1 to staff's first data request, please respond to the following questions:
  - a) Discuss in detail why TECO believes that a new residential subdivision may eventually qualify for conversion under TECO's Storm Protection Plan (SPP) Distribution Lateral Underground Program approved in Order No. PSC-2020-0293-AS-EI, especially given the fact that this is a new subdivision whose overhead distribution lines would be new and storm-hardened.
  - b) State the average age of the laterals that have qualified as an SPP Distribution Lateral Underground Project to date.
  - c) How many years of historical performance does TECO need to include overhead facilities as an SPP Distribution Lateral Underground Project?
  - d)
2. Please explain how the company derived the \$1.2 million dollar conversion cost per mile.

3. Referring to TECO's supplemental response No. 1 to staff's first data request, please answer the following questions about the charts titled "Low Density Scenario-Initial OH Construction and Conversion to UG" and "High Density Scenario-Initial OH Construction and Conversion to UG"

- a) Please explain how the company derived the number \$204,639 for cost of Initial OH construction for high density. In the response, please explain why this number differs from the numbers in the petition (i.e,  $1,1216.65 \times 176 \text{ lots} = \$ 214,130.40$ ).
- b) Please explain how the company derived the number \$326,581 for cost of Initial OH construction for low density. In the response, please explain why this number differs from the numbers in the petition (i.e,  $1,428.53 \times 210 \text{ lots} = \$299,991.30$ ).
- c) Please explain how the company derived the number \$318,485 for cost of Initial UG construction for high density. In the response, please explain why this number differs from the petition (i.e.,  $1,881.43 \times 176 \text{ lots} = \$331.131.68$ ).
- d) Please explain how the company derived the number \$519,383 for Initial UG construction for low density. In the response, please explain why this number differs from the petition (i.e.,  $2,441.11 \times 210 \text{ lots} = \$512,633.10$ ).

Please file all responses electronically no later than September 30, 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 email me at [hforrest@psc.state.fl.us](mailto:hforrest@psc.state.fl.us) if you have any questions.

Sincerely,

*/s/ Holly Forrest*

Holly Forrest  
Public Utilities Analyst

CC: Office of the Commission Clerk

