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June 10, 2022

VIA: ELECTRONIC FILING

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

Re: Petition of Tampa Electric Company for approval of a new environmental program for cost recovery through the Environmental Cost Recovery Clause Docket 20220055-EI

Dear Mr. Teitzman:

Attached please find Tampa Electric Company's Response to Staff's Second Data Request (No. 1), propounded by email on June 1, 2022.

Thank you for your assistance in connection with this matter.

Sincerely,



Malcolm N. Means

MNM/bmp
Attachments
cc: All parties of record

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of Tampa Electric Company's Response to Staff's Second Data Request (No. 1), filed on behalf of Tampa Electric Company, has been furnished by electronic mail on this 10th day of June 2022 to the following:

Ms. Ashley Weisenfeld
Mr. Jacob Imig
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
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ATTORNEY

**TAMPA ELECTRIC COMPANY
DOCKET NO. 20220055-EI
STAFF'S SECOND DATA REQUEST
REQUEST NO. 1
BATES PAGE: 1
FILED: JUNE 10, 2022**

1. In prior ECRC proceedings, operation and maintenance costs have been allocated to the appropriate rate classes on an energy basis and capital costs have been allocated on a demand basis. Please explain the reason behind TECO's request, in the instant docket, to allocate the capital expense on an energy basis instead of a demand basis.
 - A. Tampa Electric requested the capital costs be allocated on an energy basis as the precedent has been set for costs to be allocated on an energy basis if there is a connection between the level of emissions that this rule is seeking to reduce and the number of kilowatt hours generated. Specifically, in the Gulf Order, Order No. PSC-94-0044-FOF-EI, the Commission stated that "the level of emissions of such pollutants is dependent in large part on how many kilowatt hours are generated. Consequently, we find that an energy allocation method results in the most equitable apportionment of these particular compliance cost."