

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery Clause.

DOCKET NO. 20250010-EI

FILED: October 10, 2025

**PREHEARING STATEMENT
OF TAMPA ELECTRIC COMPANY**

A. APPEARANCES

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Post Office Box 391
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On behalf of Tampa Electric Company

B. WITNESSES

Witness	Subject Matter	Issue #
Direct		
A. Sloan Lewis	Storm Protection Plan Cost Recovery True-Up and Projection	1B,2B,3B,4B,5B,6B,7B,8B,9B,10
Kevin E. Palladino	Storm Protection Plan Cost Recovery True-Up and Projection	1B,2B,3B,4B,5B,6B,7B,8B,9B,10

C. EXHIBITS

Witness	Proffered By	Exhibit No.	Description	Issue #
Direct				
A. Sloan Lewis	Tampa Electric Company	ASL-1; A-Schedules, filed April 1, 2025	Schedules Supporting Storm Protection Cost Recovery Factor, Actual for the period January 2024 – December 2024	1B, 4B

A. Sloan Lewis	Tampa Electric Company	ASL-2; E-Schedules, filed May 1, 2025	Schedules supporting cost recovery amount, projected January 2025 - December 2025	2B,3B,4B,5B,6B,7B,8B,9B,10
A. Sloan Lewis	Tampa Electric Company	ASL-2; P-Schedules, filed May 1, 2025; revised July 10, 2025	Schedules supporting costs recovery amount, projected for the period January 2026 – December 2026	2B,3B,4B,5B,6B,7B,8B,9B,10
Kevin E. Palladino	Tampa Electric Company	KEP-1 filed May 14, 2025	Tampa Electric Company, 2024 Storm Protection Plan Accomplishments	1B, 4B
Kevin E. Palladino	Tampa Electric Company	KEP-2 filed May 1, 2025	Project List and Summary of Costs	2B,3B,4B,5B,6B,7B,8B,9B,10

D. STATEMENT OF BASIC POSITION

Tampa Electric Company's Statement of Basic Position

In Order No. PSC-2022-0386-FOF-EI, issued November 10, 2022 in Docket No. 20220048-EI, the Florida Public Service Commission ("Commission") found that Tampa Electric Company's ("Tampa Electric") 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.

In Order No. PSC-2025-0219-FOF-EI, issued June 19, 2025, in Docket No. 20250016-EI, the Commission found that Tampa Electric's 2026-2035 Storm Protection Plan ("2025 SPP") is in the public interest, and approved that plan with

one modification to its proposed Distribution Lateral Undergrounding Program. The modification set an annual mileage target of 75 miles of underground conversion per year.

The Commission is currently scheduled to conduct a hearing regarding the Storm Protection Cost Recovery Clause on November 4, 2025, to review and approve the proposed cost recovery factors to be used for the January 2026 through December 2026 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 Tampa Electric witness A. Sloan Lewis during the period January 2026 through December 2026. These calculations were performed in accordance with the requirements of Section 366.96, Florida Statutes, and Rule 25-6.031, 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 2024 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 2024 final true-up.

E. 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 2024 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

Tampa Electric: No Position.

ISSUE 1B: What jurisdictional amounts should the Commission approve as TECO's final 2024 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

Tampa Electric: The Commission should approve final Storm Protection Plan Cost Recovery Clause prudently incurred jurisdictional revenue requirements of \$83,300,493 and a jurisdictional cost recovery true-up over-recovery amount of \$9,284,909 for the period January 2024 through December 2024 including interest. (Lewis; Palladino)

ISSUE 1C: What jurisdictional amounts should the Commission approve as the FPUC's final 2024 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

Tampa Electric: No Position.

ISSUE 1D: What jurisdictional amounts should the Commission approve as the DEF's final 2024 prudently incurred costs and final true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

Tampa Electric: No Position.

ISSUE 2A: What jurisdictional amounts should the Commission approve as the FPL's reasonably estimated 2025 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

Tampa Electric: No Position.

ISSUE 2B: What jurisdictional amounts should the Commission approve as TECO's reasonably estimated 2025 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

Tampa Electric: The Commission should approve actual/estimated Storm Protection Plan Cost Recovery Clause jurisdictional revenue requirements of \$111,005,744 and a jurisdictional estimated cost recovery true-up over-recovery amount of \$9,355,937 for the period January 2025 through December 2025 including interest. (Lewis; Palladino)

ISSUE 2C: What jurisdictional amounts should the Commission approve as FPUC's reasonably estimated 2025 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

Tampa Electric: No Position.

ISSUE 2D: What jurisdictional amounts should the Commission approve as DEF's reasonably estimated 2025 costs and estimated true-up revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

Tampa Electric: No Position.

ISSUE 3A: What jurisdictional amounts should the Commission approve as FPL's reasonably projected 2026 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

Tampa Electric: No Position.

ISSUE 3B: What jurisdictional amounts should the Commission approve as TECO's reasonably projected 2026 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

Tampa Electric: The Commission should approve reasonably projected Storm Protection Plan Cost Recovery Clause jurisdictional revenue requirements of \$138,185,043 for the period January 2026 through December 2026. (Lewis; Palladino)

ISSUE 3C: What jurisdictional amounts should the Commission approve as FPUC's reasonably projected 2026 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

Tampa Electric: No Position.

ISSUE 3D: What jurisdictional amounts should the Commission approve as DEF's reasonably projected 2026 costs and projected revenue requirement amounts for the Storm Protection Plan Cost Recovery Clause?

Tampa Electric: 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 2026 Storm Protection Plan Cost Recovery factors for FPL?

Tampa Electric: 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 2026 Storm Protection Plan Cost Recovery factors for TECO?

Tampa Electric: 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 2026 through December 2026 is \$119,544,197. (Lewis; Palladino)

ISSUE 4C: What are the Storm Protection Plan Cost Recovery Clause total jurisdictional cost recovery amounts, including true-ups, to be included in establishing 2026 Storm Protection Plan Cost Recovery factors for FPUC?

Tampa Electric: 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 2026 Storm Protection Plan Cost Recovery factors for DEF?

Tampa Electric: No Position.

ISSUE 5A: What depreciation rates should be used to develop the depreciation expense included in the total 2026 Storm Protection Plan Cost Recovery Clause amounts for FPL?

Tampa Electric: No Position.

ISSUE 5B: What depreciation rates should be used to develop the depreciation expense included in the total 2026 Storm Protection Plan Cost Recovery Clause amounts for TECO?

Tampa Electric: The depreciation rates from Tampa Electric's Depreciation Study, approved by Order No. PSC-2025-0038-FOF-EI issued February 3, 2025, in Docket No. 20230139-EI. (Lewis; Palladino)

ISSUE 5C: What depreciation rates should be used to develop the depreciation expense included in the total 2026 Storm Protection Plan Cost Recovery Clause amounts for FPUC?

Tampa Electric: No Position.

ISSUE 5D: What depreciation rates should be used to develop the depreciation expense included in the total 2026 Storm Protection Plan Cost Recovery Clause amounts for DEF?

Tampa Electric: No Position.

ISSUE 6A: What are the appropriate 2026 jurisdictional separation factors for FPL?

Tampa Electric: No Position.

ISSUE 6B: What are the appropriate 2026 jurisdictional separation factors for TECO?

Tampa Electric: The appropriate jurisdictional separation factors are as follows:
FPSC Jurisdictional Factor: 93.5805%
FERC Jurisdictional Factor: 6.4195%
(Lewis; Palladino)

ISSUE 6C: What are the appropriate 2026 jurisdictional separation factors for FPUC?

Tampa Electric: No Position.

ISSUE 6D: What are the appropriate 2026 jurisdictional separation factors for DEF?

Tampa Electric: No Position.

ISSUE 7A: What are the appropriate 2026 Storm Protection Plan Cost Recovery Clause factors for each rate class for FPL?

Tampa Electric: No Position.

ISSUE 7B: What are the appropriate 2026 Storm Protection Plan Cost Recovery Clause factors for each rate class for TECO?

Tampa Electric: The appropriate January 2026 through December 2026 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. 20240026-EI are as follows:

<u>Rate Schedule</u>	Cost Recovery Factors (cents per kWh)
RS	0.717
GS and CS	0.568
GSD Optional – Secondary	0.493
GSD Optional – Primary	0.488
GSD Optional – Subtransmission	0.483
LS-1, LS-2	0.574

<u>Rate Schedule</u>	Cost Recovery Factors (dollars per kW)
GSD/GSDT/SBD/SBDT – Secondary	2.02
GSD/GSDT/SBD/SBDT – Primary	2.00
GSD/GSDT/SBD/SBDT – Subtransmission	1.98
GSLD/GSLDT/SBLD/SBLDT - Primary	1.35
GSLD/GSLDT/SBLD/SBLDT - Subtransmission	0.11
(Lewis; Palladino)	

ISSUE 7C: What are the appropriate 2026 Storm Protection Plan Cost Recovery Clause factors for each rate class for FPUC?

Tampa Electric: No Position.

ISSUE 7D: What are the appropriate 2026 Storm Protection Plan Cost Recovery Clause factors for each rate class for DEF?

Tampa Electric: No Position.

ISSUE 8A: What should be the effective date of the 2026 Storm Protection Plan Cost Recovery Clause factors for billing purposes for FPL?

Tampa Electric: No Position.

ISSUE 8B: What should be the effective date of the 2026 Storm Protection Plan Cost Recovery Clause factors for billing purposes for TECO?

Tampa Electric: The effective date of the new Storm Protection Plan Cost Recovery Clause factors should be January 1, 2026. (Lewis; Palladino)

ISSUE 8C: What should be the effective date of the 2026 Storm Protection Plan Cost Recovery Clause factors for billing purposes for FPUC?

Tampa Electric: No Position.

ISSUE 8D: What should be the effective date of the 2026 Storm Protection Plan Cost Recovery Clause factors for billing purposes for DEF?

Tampa Electric: No Position.

ISSUE 9A: Should the Commission approve revised tariffs reflecting the 2026 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for FPL?

Tampa Electric: No Position.

ISSUE 9B: Should the Commission approve revised tariffs reflecting the 2026 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for TECO?

Tampa Electric: Yes, the Commission should approve revised tariffs reflecting the new Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding. (Lewis, Palladino)

ISSUE 9C: Should the Commission approve revised tariffs reflecting the 2026 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for FPUC?

Tampa Electric: No Position.

ISSUE 9D: Should the Commission approve revised tariffs reflecting the 2026 Storm Protection Plan Cost Recovery Clause factors determined to be appropriate in this proceeding for DEF?

Tampa Electric: No Position.

ISSUE 10: Should this docket be closed?

Tampa Electric: 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. (Lewis; Palladino)

OPC Proposed Company-Specific Issues

None at this time.

F. STIPULATED ISSUES

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

G. PENDING MOTIONS

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

H. PENDING CONFIDENTIALITY CLAIMS OR REQUESTS

Tampa Electric is not aware of any pending confidentiality claims or requests.

I. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

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

J. STATEMENT OF SEQUESTRATION OF WITNESSES

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

K. COMPLIANCE WITH ORDER NO. PSC-2025-0048-PCO-EI

Tampa Electric has complied with all requirements of the Order Establishing Procedure entered in this docket.

DATED this 10th day of October, 2025.

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 10th day of October 2025 to the following:

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