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April 2, 2024

**ELECTRONIC FILING**

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

Re: Docket 20240026-EI; Petition for Rate Increase by Tampa Electric Company

Dear Mr. Teitzman:

Attached for filing on behalf of Tampa Electric Company in the above-referenced docket is the Direct Testimony of Kris Stryker and Exhibit No. KS-1.

Thank you for your assistance in connection with this matter.

(Document 5 of 32)

Sincerely,

A handwritten signature in blue ink, appearing to read 'J. Jeffry Wahlen', with a long horizontal flourish extending to the right.

J. Jeffry Wahlen

cc: All parties

JJW/ne  
Attachment



**BEFORE THE  
FLORIDA PUBLIC SERVICE COMMISSION**

**DOCKET NO. 20240026-EI  
IN RE: PETITION FOR RATE INCREASE  
BY TAMPA ELECTRIC COMPANY**

**PREPARED DIRECT TESTIMONY AND EXHIBIT  
OF  
CARLOS ALDAZABAL**

**TABLE OF CONTENTS**  
**PREPARED DIRECT TESTIMONY AND EXHIBIT**  
**OF**  
**CARLOS ALDAZABAL**

(1) ENERGY SUPPLY OVERVIEW..... 6  
(2) ENERGY SUPPLY TRANSFORMATION SINCE LAST RATE CASE..... 14  
(3) FUTURE ENERGY SUPPLY PLANS..... 25  
(4) 2025 RATE BASE AND O&M EXPENSES..... 28  
(5) SYA PROJECTS..... 44  
(6) SUMMARY..... 71  
EXHIBIT..... 73

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

PREPARED DIRECT TESTIMONY

OF

CARLOS ALDAZABAL

1  
2  
3  
4  
5  
6 Q. Please state your name, address, occupation, and employer.

7  
8 A. My name is Carlos Aldazabal. My business address is 702  
9 North Franklin Street, Tampa, Florida 33602. I am employed  
10 by Tampa Electric Company ("Tampa Electric" or the  
11 "company") as Vice President Energy Supply.

12  
13 Q. Please describe your duties and responsibilities in that  
14 position.

15  
16 A. I am responsible for the safe, efficient, and reliable  
17 operation of Tampa Electric's electric generating and  
18 energy storage assets. My duties include oversight of all  
19 safety, environment, compliance, team member, operating,  
20 and capital budget management activities in our Energy  
21 Supply department. These include power plant operations;  
22 resource planning; origination and trading; and emerging  
23 technologies. I am also responsible for the company's  
24 general procurement and contracting activities.

25

1 I report to our President and Chief Executive Officer,  
2 Archie Collins. One officer, one senior director, and eight  
3 directors report directly to me. Together we lead the  
4 Energy Supply department.

5

6 **Q.** Please summarize your educational background and business  
7 experience.

8

9 **A.** I received a Bachelor of Science degree in Accounting and  
10 a Master of Accountancy degree from the University of South  
11 Florida in Tampa, in 1991 and 1995, respectively. I am  
12 licensed as a Certified Public Accountant in the State of  
13 Florida and have 28 years of electric utility experience.

14

15 I began my career at Florida Power Corporation (now Duke  
16 Energy Florida) and joined Tampa Electric's accounting  
17 department in 1999. After four years, I moved into the  
18 company's regulatory affairs department where I eventually  
19 became Vice President of Regulatory for both Tampa Electric  
20 and its affiliate, Peoples Gas System. I was given a  
21 special assignment in Electric Delivery in 2019 to gain  
22 operations experience before moving to my current position  
23 in 2021.

24

25 I have worked in the areas of fuel and interchange

1 accounting, surveillance reporting, budgeting and  
2 analysis, cost recovery clause management, rate case  
3 management, investor relations, transmission engineering  
4 and operations, fleet management, stores management,  
5 procurement, and Energy Supply.

6  
7 **Q.** Have you testified before the Florida Public Service  
8 Commission ("Commission")?

9  
10 **A.** Yes. I have testified or filed testimony before the  
11 Commission on behalf of Tampa Electric in the Commission's  
12 annual Fuel & Purchased Power proceedings from 2005 to 2012.

13  
14 **Q.** What are the purposes of your direct testimony?

15  
16 **A.** The purposes of my direct testimony are to (1) describe  
17 the company's Energy Supply system; (2) summarize our  
18 successes transforming Energy Supply since our last rate  
19 case; (3) outline the company's future Energy Supply plans;  
20 and (4) demonstrate that the Energy Supply rate base  
21 amounts and operations and maintenance ("O&M") expense  
22 levels for the 2025 test year are reasonable and prudent.  
23 I will also explain the South Tampa Resilience, Polk 1  
24 Flexibility, Polk Fuel Diversity, Bearss Operations  
25 Center, and Corporate Headquarters projects, which are

1 included in our proposed 2026 and 2027 subsequent year  
2 adjustments ("SYA"), why these projects are prudent, and  
3 how they will benefit our customers.  
4

5 **Q.** How does your direct testimony relate to the direct  
6 testimony of other Tampa Electric witnesses?  
7

8 **A.** I have overall responsibility for the capital investments  
9 and O&M expenses for the Energy Supply area; however, Tampa  
10 Electric witness Kris Stryker, Vice President Clean Energy  
11 and Emerging Technology, reports to me and will discuss  
12 the solar generating and energy storage additions included  
13 in our 2025 test year and SYA. Tampa Electric witness Jose  
14 Aponte, Manager Resource Planning, will show that the  
15 generation, solar, and energy storage included in our 2025  
16 test year and 2026 and 2027 SYA are cost effective.  
17

18 Tampa Electric witness Richard Latta, Utility Controller,  
19 will compile the 2025 rate base amounts and O&M expense  
20 levels described in my testimony with similar information  
21 from other witnesses to calculate the company's 2025  
22 revenue requirement and proposed 2025 base rate increase.  
23 He also uses the project costs in my testimony for the five  
24 SYA projects listed above to calculate the revenue  
25 requirements for our proposed 2026 and 2027 SYA. Our

1 proposed 2026 and 2027 SYA also include specific solar,  
2 energy storage, and Electric Delivery Projects that are  
3 explained by Mr. Stryker and Tampa Electric witness David  
4 Lukcic, Senior Director Operational Technology and  
5 Strategy, in their testimony.  
6

7 **Q.** Have you prepared an exhibit to support your direct  
8 testimony?  
9

10 **A.** Yes. Exhibit No. CA-1, entitled "Exhibit of Carlos  
11 Aldazabal" was prepared under my direction and supervision.  
12 The contents of my exhibit were derived from the business  
13 records of the company and are true and correct to the best  
14 of my information and belief. My exhibit consists of nine  
15 documents, as follows.  
16

- |    |                |   |
|----|----------------|---|
| 17 | Document No. 1 | List of Minimum Filing Requirement          |
| 18 |                | Schedules Sponsored or Co-Sponsored by      |
| 19 |                | Carlos Aldazabal                            |
| 20 | Document No. 2 | Generation Mix                              |
| 21 | Document No. 3 | Total System Heat Rate (2013-2023)          |
| 22 | Document No. 4 | Total CO <sub>2</sub> Emissions (2013-2023) |
| 23 | Document No. 5 | System Heat Rate and Fuel Savings           |
| 24 | Document No. 6 | Total System Net EAF Percentage             |
| 25 | Document No. 7 | Solar Projects 2021-2023                    |



1 Document No. 8 Headquarters Evaluation Scorecard  
2 Document No. 9 Headquarters Evaluation  
3 Document No. 10 Energy Supply Capital Expense Summary  
4 2022-2025  
5

6 **Q.** Do you sponsor any sections of Tampa Electric's Minimum  
7 Filing Requirement ("MFR") Schedules?  
8

9 **A.** Yes. I sponsor or co-sponsor the MFR schedules listed in  
10 Document No. 1 of my exhibit. The data and information on  
11 these schedules were taken from the business records of  
12 the company and are true and correct to the best of my  
13 information and belief.  
14

15 **(1) ENERGY SUPPLY OVERVIEW**

16 **Q.** Please describe the company's Energy Supply area.  
17

18 **A.** Our Energy Supply area has a combined staff of  
19 approximately 620 employee team members. Its functions  
20 include thermal and solar generating operations;  
21 environmental management; engineering and project  
22 management; resource planning; capital planning; natural  
23 gas origination and trading; energy trading; general  
24 company procurement; stores and inventory management for  
25 Energy Supply and Energy Delivery; and facility services.

1 It includes the Clean Energy and Emerging Technology group  
2 led by Mr. Stryker.

3  
4 **Q.** What role does safety play in Energy Supply?

5  
6 **A.** Safety is our number one priority. We are committed to the  
7 beliefs that all injuries are preventable and that no  
8 business interest can take priority over safety. We believe  
9 that everyone is responsible for safety and that all team  
10 members must be personally engaged in all aspects of  
11 safety.

12  
13 The foundation of our safety program is a multi-tiered  
14 Safety Management System that sets minimum expectations  
15 for safety leadership; addresses risk management;  
16 prescribes programs, procedures, and practices; promotes  
17 safety communications, awareness, and training; cultivates  
18 a strong safety culture and safe behavior; sets contractor  
19 safety management standards; enhances asset integrity;  
20 establishes tools for measurement and reporting;  
21 prescribes incident management and investigates  
22 procedures; and includes auditing and compliance measures.

23  
24 I am proud that Tampa Electric's Energy Supply organization  
25 has finished in the top two quartiles when compared to

1 other electric utilities in the Southeast Electric Exchange  
2 for the last three years. Additionally, in 2023 the company  
3 achieved an overall 0.70 incident rate, which is a six  
4 percent improvement from our five-year average.

5  
6 **Q.** Please describe the Clean Energy and Emerging Technology  
7 group.

8  
9 **A.** The Clean Energy and Emerging Technology group is devoted  
10 to diversifying the company's generation mix in a cost-  
11 effective manner for customers. They develop our solar and  
12 energy storage projects and explore innovative  
13 technologies to support our thermal generation units. Mr.  
14 Stryker further explains this group and the work it  
15 performs in his testimony.

16  
17 **Q.** Please generally describe the company's current electric  
18 generating system.

19  
20 **A.** Tampa Electric maintains a diverse portfolio of electric  
21 generating facilities to safely provide reliable, cost-  
22 effective electric power for its customers. Our generation  
23 portfolio consists of 14 thermal generating units and five  
24 thermal peaking units at three central generating stations,  
25 and 22 geographically dispersed solar sites, for a total

1 of approximately 6,433 megawatts ("MW") of winter peaking  
2 capacity. Our generating fleet includes a dual fuel (solid  
3 fuel/natural gas) steam unit; combined cycle units ("CC");  
4 combustion turbine ("CT") peaking units, some of which are  
5 dual fuel (natural gas/oil); a dual fuel (petcoke/natural  
6 gas) integrated gasification combined cycle ("IGCC") unit;  
7 and photovoltaic solar facilities ("solar").

8  
9 **Q.** Please describe the company's central electric generating  
10 stations.

11  
12 **A.** The company's three central electric generating stations  
13 are the Big Bend Power Station ("Big Bend"), the Polk Power  
14 Station ("Polk"), and the H.L. Culbreath Bayside Power  
15 Station ("Bayside").

16  
17 Big Bend consists of two units. The Big Bend Unit 1  
18 modernization project was completed and went in service in  
19 December 2022. The repowered Big Bend Unit 1 is a natural  
20 gas fired two-on-one generating facility. Big Bend Unit 4  
21 is a pulverized coal fired steam unit equipped with a  
22 desulfurization scrubber, electrostatic precipitator, and  
23 a Selective Catalytic Reduction ("SCR") air pollution  
24 control system. We added dual fuel capability to Big Bend  
25 Unit 4 in 2013 so it can also be fired with natural gas.

1 Bayside consists of two natural gas fired combined cycle  
2 ("NGCC") units and four aero derivative CT. Bayside Unit 1  
3 consists of three CT, three Heat Recovery Steam Generators  
4 ("HRSG"), and one steam turbine. Bayside Unit 2 consists of  
5 four CT, four HRSG, and one steam turbine. Bayside Units 3,  
6 4, 5, and 6 are natural gas aero derivative CT.

7  
8 Polk has two units. Polk Unit 1 is a dual fuel IGCC/natural  
9 gas unit consisting of one CT, one HRSG, and one steam  
10 turbine. Polk Unit 2 uses four natural gas CT, four HRSG,  
11 and one steam turbine. Two of the Polk Unit 2 CT can use  
12 distillate oil as a back-up fuel. The Polk Unit 2 CT were  
13 transformed into highly efficient CC generating units  
14 ("Polk 2 Conversion") in 2017.

15  
16 **Q.** Please describe the company's existing solar facilities.

17  
18 **A.** Tampa Electric currently owns and operates solar facilities  
19 with approximately 1,250 MW of generating capacity at 22  
20 geographically dispersed locations throughout its service  
21 territory. All 21 solar facilities are single axis tracking  
22 with capacities ranging from 19.8 MW to 74.5 MW. The Big  
23 Bend Solar facility includes a 12.6 MW energy storage unit.  
24 The company also owns and operates five small solar sites  
25 with a combined generating capacity of less than 8 MW. Mr.

1 Stryker discusses our future planned solar projects in his  
2 testimony.

3

4 **Q.** Please describe the company's current fuel mix for  
5 generating electricity.

6

7 **A.** Since 2013, Tampa Electric has dramatically changed the  
8 mix of fuel we use to generate electricity. In 2013, our  
9 generation mix was 58.7 percent coal, 41.2 percent natural  
10 gas, less than 0.1 percent light oil, and 0 percent solar.  
11 In 2023, about 3.8 percent of our electricity was generated  
12 using coal, about 87.6 percent was natural gas-fired,  
13 approximately 8.6 percent was from solar, and less than  
14 0.1 percent from light oil. The company reduced its tons  
15 of coal consumption by approximately 92 percent since 2013.  
16 Document No. 2 of my exhibit depicts how our generation  
17 mix has changed in the last decade.

18

19 **Q.** Have these changes improved the company's thermal  
20 efficiency?

21

22 **A.** Yes. We measure our thermal efficiency by calculating our  
23 average net system heat rate (Btu/kWh). This calculation  
24 measures the amount of fuel energy we use to generate  
25 electric energy, so a lower number means that we are more

1 efficient because our system needs and uses less fuel  
2 energy to generate a kilowatt-hour ("kWh") of electricity.

3  
4 Our system heat rate has declined from 9,277 in 2013 to  
5 6,755 in 2023, an improvement of about 27 percent over the  
6 last decade. This heat rate reduction means lower air  
7 emissions from power generation and lower fuel costs for  
8 customers. Documents No. 3 and 4, respectively, in my  
9 exhibit detail how our thermal efficiency and emissions  
10 profile have improved since 2013.

11  
12 **Q.** Have these changes to the company's generating facilities  
13 helped reduce the company's annual fuel expenses?

14  
15 **A.** Yes. While market dynamics impact the price of natural gas,  
16 reducing our system heat rate has generated significant  
17 fuel savings for customers. For example, when our system  
18 heat rate was approximately 9,000, and assuming a natural  
19 gas price of \$4 per MMBtu, it would cost \$36 to generate  
20 one megawatt-hour ("MWh") of electricity. However, with  
21 our current heat rate of approximately 6,700, the cost to  
22 generate that same electricity would be \$26.80 per MWh,  
23 which means over 25 percent lower fuel costs for customers.

24  
25 As the company continues to add solar and make efficiency

1 improvements to its existing generating assets, the  
2 company's system heat rate will continue to decline and  
3 result in lower fuel costs for customers. Document No. 5  
4 of my exhibit shows how our system heat rate has declined  
5 since 2016 and the corresponding estimated fuel savings  
6 associated with that decline.

7  
8 **Q.** Please describe the reliability of Tampa Electric's  
9 generating units since 2017.

10  
11 **A.** The reliability of our generating fleet is measured by  
12 generating unit annual net Equivalent Availability Factor  
13 ("EAF"), which reflects the amount of time our generating  
14 units are expected to be in service after accounting for  
15 planned and unplanned outages.

16  
17 We have improved our overall fleet EAF from approximately  
18 78 percent to 81 percent since 2017. Our fleetwide EAF is  
19 a weighted average of performance, with the NGCC fleet  
20 having a higher EAF (high 80's to low 90's) and our older  
21 dual fuel boiler units operating in the low 70's. The lower  
22 EAF across the boiler units is a result of higher wear and  
23 tear caused by coal combustion, resulting in boiler tube  
24 leaks, which corresponds to longer duration planned  
25 maintenance outages. The recent retirement of Big Bend Unit



1 3 in 2023 will yield a higher system EAF starting in 2024.  
2 Document No. 6 of my exhibit provides additional details  
3 on our system EAF since 2017.  
4

5 **(2) ENERGY SUPPLY TRANSFORMATION SINCE LAST RATE CASE**

6 **Q.** What major changes did the company make in its Energy  
7 Supply area since its last rate case in 2021?  
8

9 **A.** The settlement agreement in our 2021 rate case ("2021  
10 Agreement") facilitated two major transformations in  
11 Energy Supply. First, we added over 600 MW of solar  
12 generating capacity. Second, we executed our Big Bend  
13 Modernization Project.  
14

15 **Q.** Please describe the solar facilities placed in service  
16 during the term of the 2021 Agreement.  
17

18 **A.** From late 2021 to 2023, the company installed an additional  
19 595.3 MW of cost-effective solar additions through 11  
20 individual facilities as an installed total cost of  
21 approximately \$850 million. The revenue requirement  
22 associated with these facilities was recovered via two  
23 generation base rate adjustments ("GBRA") approved in the  
24 2021 Agreement and is included in our current base rates  
25 and charges. These additions brought total solar capacity

1 on Tampa Electric's system to over 1.25 gigawatts, or  
2 enough to power 200,000 homes. Document No. 7 of my exhibit  
3 shows additional details about these projects.  
4

5 **Q.** Were these projects constructed and placed in service  
6 consistent with the costs and dates estimated in the  
7 company's 2021 rate case and 2021 Agreement?  
8

9 **A.** Three of the four projects planned in 2021 slipped into  
10 the first part of 2022, which made them eligible for  
11 Production Tax Credits ("PTC") benefiting customers. Due  
12 to the signing of the Inflation Reduction Act ("IRA"),  
13 competition for large scale solar components has increased  
14 resulting in cost pressures on any materials not under  
15 contract. While the PTC improves the cost-effectiveness of  
16 these projects, those benefits were partially offset by  
17 higher component and materials costs. Mr. Stryker provides  
18 additional details on the higher material and component  
19 costs in his direct testimony. All 11 projects contemplated  
20 in the 2021 Settlement Agreement were placed in service by  
21 the end of 2023.  
22

23 **Q.** Please describe the Big Bend Modernization Project.  
24

25 **A.** The Big Bend Modernization Project transformed the way we

1 generate electricity at Big Bend Station. Design work began  
2 in 2017, and field work began in 2019. The company retired  
3 Big Bend Unit 2, refurbished the Big Bend Unit 1 steam  
4 turbine and generator, and replaced the Unit 1 boiler and  
5 coal processing equipment with two new, highly efficient  
6 General Electric 7HA.02 combustion turbines and associated  
7 heat recovery steam generators.

8  
9 The Big Bend Modernization project was constructed in two  
10 phases. In phase one, the company constructed two new  
11 highly efficient CT in simple cycle mode and placed them  
12 in service in 2021. The second phase involved the addition  
13 of the HRSG, facilitating the unit's operation in CC mode,  
14 and was completed in December 2022.

15  
16 The repowered Big Bend Unit 1 went into service in December  
17 2022 and now is the company's most efficient natural gas  
18 combined cycle unit. We repowered Unit 1 as a clean natural  
19 gas-fired two-on-one CC generating facility using an  
20 existing steam turbine generator and once-through cooling  
21 system. Big Bend Unit 1 now has a nominal 1,120 MW of  
22 winter capacity and 1,055 MW of summer capacity with a  
23 6,300 heat rate.

24  
25 **Q.** Did the company construct and place the Big Bend

1 Modernization Project in service consistent with the costs  
2 and dates estimated in the company's 2021 rate case and  
3 2021 Agreement?  
4

5 **A.** Yes. We forecasted the total cost of the project to be  
6 \$904.6 million, and the actual cost was \$875 million. This  
7 was an extraordinary accomplishment under the challenging  
8 supply chain and macroeconomic environment conditions at  
9 the time. We attribute the lower cost to exceptional  
10 project planning and the use of creative contract terms  
11 for projects of this size and scope, such as use of  
12 competitive bidding of fixed pricing terms for major  
13 equipment and use of competitive bidding followed by open  
14 book negotiation for the construction contract once the  
15 design was finalized.  
16

17 **Q.** What other activities did the company undertake in the  
18 Energy Supply area to benefit customers since 2021?  
19

20 **A.** Our other activities fall into three categories, new  
21 energy storage capacity at Big Bend, an Advanced Gas Path  
22 project at Bayside, and other smaller, more routine  
23 improvements.  
24  
25

1 BIG BEND ENERGY STORAGE

2 **Q.** Please describe the company's energy storage project.

3

4 **A.** The company installed a 12.6 MW energy storage unit at  
5 Big Bend and coupled it with a single axis tracking solar  
6 facility there. The energy storage unit went into service  
7 in December 2019 with a total project cost of \$11.5  
8 million. This energy storage pilot has provided valuable  
9 insights on how storage interacts with generation  
10 resources and how best to integrate them into our electric  
11 grid. This project benefited customers as it has provided  
12 valuable insights on how to optimally operate these  
13 storage systems and how to utilize them to drive down  
14 system heat rate.

15

16 BAYSIDE ADVANCED GAS PATH PROJECT

17 **Q.** What is an Advanced Gas Path ("AGP") Project?

18

19 **A.** AGP technology is a proprietary performance enhancement  
20 solution developed by General Electric for combustion  
21 turbines that consists of improvements to the cooling  
22 systems, hot section parts redesign, and sealing to  
23 maximize output, efficiency, and flexibility from  
24 existing assets. It is a proven technology that has been  
25 installed on hundreds of gas turbines. The company has

1 applied the AGP solution to Bayside Units 1 and 2.

2

3 **Q.** Please describe the Bayside Unit 1 AGP project.

4

5 **A.** The company completed the AGP work described above for  
6 Bayside Unit 1 in 2022, which resulted in a 10 percent  
7 increase in unit output and a heat rate improvement of  
8 nearly five percent. This translates to direct fuel  
9 savings for customers. By installing fast start  
10 capability, we can synchronize Bayside Unit 1 to the grid  
11 in six to seven minutes, which is a 55 percent  
12 improvement. That translates to better operating  
13 efficiency and an improved system heat rate, which reduces  
14 fuel costs for customers.

15

16 **Q.** Please describe the Bayside Unit 2 AGP project.

17

18 **A.** The Bayside Unit 2 AGP project is essentially the same as  
19 the Unit 1 project. We expect to complete the Bayside Unit  
20 2 portion of the project in the Spring of 2024 and to see  
21 the same type of improvements to Bayside Unit 2 that we  
22 experienced for Bayside Unit 1.

23

24 **Q.** Why were the Bayside AGP projects needed?

25

1 **A.** Yes. The Bayside AGP upgrades were initiated to help meet  
2 and maintain our winter reserve margin requirements. Our  
3 analysis showed these projects were a very low-cost option  
4 to add 128 MW of output capacity compared to other  
5 generation options. We also anticipated that the projects  
6 would reduce unit heat rate, generate fuel savings for  
7 customers, and provide operational flexibility by  
8 improving start times, which helps us react quickly to load  
9 and supply changes.

10

11 **Q.** What alternatives did the company consider?

12

13 **A.** The company considered batteries and other new generation  
14 options, but the cost-effectiveness of these projects  
15 compared to the next best option was \$86.6 million  
16 favorable to customers.

17

18 **Q.** What did the company do to ensure the projects were or will  
19 be completed at the lowest reasonable cost?

20

21 **A.** The company issued a request for proposal ("RFP") to  
22 multiple vendors for Output and Efficiency enhancements  
23 for the seven Bayside 7FA combustion turbines. From that  
24 RFP, two main vendors were selected for further  
25 discussions. After more detailed discussions and

1 negotiations with both vendors, General Electric ("GE")  
2 was selected as our preferred vendor for the upgrades. We  
3 then engaged in negotiations with GE for final pricing for  
4 the upgrades. We negotiated firm turn-key pricing to  
5 eliminate any price or market volatility and other unknowns  
6 associated with the outage. For the remainder of the work  
7 not covered by the GE contract, primarily the HRSG and  
8 balance of plant work, we issued another firm price, turn-  
9 key RFP to vendors. Two vendors, Central Maintenance and  
10 Welding and TEIC, were selected for the remainder of the  
11 required work. During the outage, we tracked all additional  
12 work through the "Extra Work Authorization" process to  
13 ensure the validity of the request. Finally, we ensured  
14 cost management with direct Tampa Electric supervision over  
15 all contractors onsite.

16  
17 **Q.** Are the Bayside AGP projects prudent?  
18

19 **A.** Yes. The Bayside AGP projects are part of Tampa Electric's  
20 continuing effort to improve the efficiency, sufficiency,  
21 and adequacy of its facilities. As previously stated,  
22 these projects were needed to meet a winter reserve margin  
23 requirement. These innovative technologies result in  
24 direct fuel savings for customers. The improved unit  
25 flexibility also helps support renewable generation on



1 the grid because the faster response time of the turbines  
2 helps with solar intermittency that can occur during  
3 afternoon storms, cloud cover, and sunrise and sundown,  
4 which has direct fuel savings for customers. These  
5 investments in emerging technologies at Bayside will  
6 allow us to deliver safe, reliable, and efficient power  
7 to customers for many years to come.

8  
9 OTHER PROJECTS

10 **Q.** What other projects did the company undertake in the  
11 settlement period to improve Energy Supply?

12  
13 **A.** The company also invested capital at Polk to improve  
14 reliability by upgrading the relays on the generator step-  
15 up transformers ("GSU") and station transformers,  
16 replaced the 13kV bus and insulators in CT 2, replaced  
17 the brush rigging on CT 2 through 5, and performed  
18 switchgear feeder relay upgrades. That work will  
19 translate to improved unit reliability and availability.

20  
21 Investments at Bayside in addition to the AGP work include  
22 a steam turbine major outage with rotor replacements,  
23 valve overhauls, exciter replacements, and controls  
24 upgrades, which will provide long-term reliability of the  
25 station. Another major investment was the refurbishment

1 of the 60-year-old cooling water intake structure, which  
2 required refurbishment for safety and long-term  
3 reliability. Finally, the station also replaced  
4 circulating water pumps and added a vacuum priming system  
5 which helped improve unit heat rate and upgraded  
6 protection relays that were no longer supported by the  
7 manufacturer.

8  
9 Investments at Big Bend include replacement of the Big  
10 Bend Unit 4 furnace waterwall tubing to improve  
11 reliability and heat rate as the new tubing allows for  
12 increased header pressure and capacity. A new natural gas  
13 addition to the Big Bend Unit 4 boiler created a full  
14 capacity dual fuel operation design. Lastly, in 2024, heat  
15 rate improvements will be realized with the replacement  
16 of the A and B Big Bend Unit 4 hot air expansion joints  
17 and pulverizer inlet ductwork. The C and D pulverizer  
18 joints and ducts were replaced in 2023.

19  
20 RESULTS

21 **Q.** Have the addition of solar, Big Bend Modernization, AGP,  
22 and the other capital projects during the settlement  
23 period enabled the company to change the way Energy Supply  
24 operates to benefit customers?

25

1 **A.** Yes. The changes described above have substantially  
2 changed how our generating fleet is dispatched and the  
3 level of O&M expenses required to sustain reliable  
4 operation. Overall Energy Supply employee count will  
5 decline in 2024 and remain constant in 2025.

6  
7 **Q.** Please explain.

8  
9 **A.** We are adding employees to operate and maintain our new  
10 solar facilities but need fewer employees at Big Bend for  
11 a net employee reduction in 2024.

12  
13 We use a combination of in-house and contractor resources  
14 to operate and maintain our solar facilities but consider  
15 market dynamics to increase and decrease our use of outside  
16 contractor services while deliberately working to "build  
17 our bench" with employees who are skilled solar operators.  
18 This will allow us to keep solar operating costs down while  
19 developing in-house solar skills and knowledge.

20  
21 The Big Bend Modernization project enabled us to make  
22 staffing and contractor reductions at Big Bend as we  
23 continue to shift away from older generation, which  
24 requires more operating and maintenance personnel, to more  
25 efficient combined cycle units, like repowered Big Bend

1 Unit 1, that need fewer people to operate and maintain.

2  
3 **Q.** Were all the changes to the company's generating fleet  
4 described above prudent?

5  
6 **A.** Yes. Each change was made considering the conditions and  
7 circumstances known at the time after careful internal  
8 studies that considered safety, reliability, and  
9 economics.

10  
11 **(3) FUTURE ENERGY SUPPLY PLANS**

12 **Q.** Are technological improvements, fuel prices, and public  
13 policy considerations continuing to drive changes in how  
14 the company generates electricity?

15  
16 **A.** Yes. Technology improvements and tax incentives have made  
17 solar generation a cost-effective alternative to natural  
18 gas-fired generation. Energy storage technology continues  
19 to improve and provides capacity to store power with a  
20 lower cost to generate and helps reduce costs to customers.

21  
22 Absent an unforeseen change, the economic viability of coal  
23 for generating electricity will continue to erode, while  
24 the future will remain bright for renewable energy  
25 resources and storage capacity. However, as shown in

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Document No. 6 of my exhibit, Tampa Electric still relies heavily on highly efficient NGCC technology to meet a large portion of our electric generation needs. Natural gas plays a vital and strategic role in meeting the energy needs of our customers and will continue playing a crucial role despite the company's commitment to fuel cost reduction and fuel diversity.

**Q.** What future plans does the company have for Energy Supply?

**A.** In 2024 and 2025, the company plans to add additional solar generating capacity, energy storage capacity, and begin a small project, funded primarily by United States Department of Energy grants, to investigate the suitability of the geological conditions at and near Polk for underground carbon storage. Mr. Stryker describes these projects and why they are prudent in his testimony.

We have three major planned outages in 2025 and will be making structural improvements at our generating stations. I will explain these later in my testimony.

**Q.** Does the company have other plans for Energy Supply in 2026 and 2027?

1 **A.** Yes. The company plans to place in service six additional  
2 solar facilities and four energy storage capacity  
3 facilities in 2024, 2025, and 2026. These projects, some  
4 of which are included in the company's proposed SYA, are  
5 explained by Mr. Stryker.

6  
7 The company is also planning a Polk 1 Flexibility Project,  
8 a Polk Fuel Diversity Project, and a South Tampa  
9 Resilience Project. I will describe each of these projects  
10 in the SYA section of my testimony, below.

11  
12 STRUCTURE IMPROVEMENTS AT GENERATION STATIONS

13 **Q.** What are the company's plans to upgrade structures at its  
14 generating facilities?

15  
16 **A.** While many of the generating units have gone through  
17 conversions, many of the administrative buildings that  
18 house the support staff are still the original buildings.  
19 These buildings require improvements to HVAC systems,  
20 lighting, layout, and facilities and no longer meet  
21 building codes.

22  
23 **Q.** Why are these improvements needed?

24  
25 **A.** Tampa Electric's generation stations have all been in

1 service for several decades. For example, some of the  
2 existing buildings at Big Bend and Bayside are more than  
3 50 years old. Those buildings are no longer up to code or  
4 ADA compliant. As repairs are needed, it is sometimes  
5 necessary to remodel the buildings and bring them up to  
6 existing codes to obtain permits to proceed with the  
7 necessary work. These improvements allow employees to  
8 occupy the space in a safe manner with updated facilities.

9  
10 **(4) 2025 RATE BASE AND O&M EXPENSES**

11 RATE BASE

12 **Q.** How does Tampa Electric determine the construction  
13 program and capital budget for the Energy Supply area?

14  
15 **A.** Tampa Electric uses an Integrated Resource Planning  
16 ("IRP") process. The IRP process determines the timing,  
17 type, and amounts of additional resources required to  
18 maintain system reliability in a cost-effective manner.  
19 The process considers expected growth in customer demand,  
20 energy efficiency, and conservation programs; existing  
21 and future demand-side management ("DSM") programs; and  
22 a wide range of supply-side generating technologies  
23 applicable to the company's service area.

24  
25 **Q.** How does the company plan and manage its generation and

1 other major capital improvement expansion projects?

2  
3 **A.** The company has a mid-term planning process in place to  
4 manage its generation and other major capital improvement  
5 projects. As part of this process, the company conducts  
6 a screening analysis and develops a multi-year business  
7 plan. This plan includes capital and maintenance  
8 forecasts for projects deemed necessary to ensure safety;  
9 maintain or improve performance of existing stations;  
10 capacity, efficiency, and reliability improvements; and  
11 environmental compliance. The company updates the  
12 business plan as new information is obtained.

13  
14 Each year the company determines the capital plan for the  
15 following fiscal year. Information regarding generating  
16 unit availability, operating conditions, new regulations,  
17 and environmental compliance is reviewed and considered  
18 for inclusion in the capital plan. Some projects are  
19 required because of new environmental or safety regulations  
20 or considerations. Other projects are prioritized based  
21 upon their relative benefits. Through a review process,  
22 the projects are selected for inclusion in the budget for  
23 the next year. These projects are initiated and executed  
24 by a project team in a method like that for new generation  
25 projects. Each project goes through an estimating and



1 approval process to ensure its benefit and need. These  
2 projects are monitored for cost, schedule, and desired  
3 performance throughout the process until they are completed  
4 and in-service. This process has been particularly  
5 challenging over the last several years due to inflation.  
6 To illustrate, material costs such as Grain Oriented  
7 Electrical Steel (GOES) have doubled since January 2020,  
8 and transformers needed for our solar sites have also  
9 increased nearly 50 percent.

10  
11 **Q.** Does the company consider planned generation outages when  
12 preparing its annual capital budget?

13  
14 **A.** Yes. A proper asset management and maintenance program is  
15 critical to ensure the company's generating assets are  
16 reliable and perform as designed. Tampa Electric works with  
17 the original equipment manufacturer ("OEM") of each  
18 critical asset to ensure outages are taken at the  
19 appropriate intervals and the needed maintenance is  
20 performed. The company also has entered into Contract  
21 Service Agreements ("CSA") with GE, who is the OEM for many  
22 of our CT, to help monitor these assets and ensure parts  
23 are available during planned outages. The company plans  
24 the outages during the shoulder months to ensure generation  
25 resource availability, as well as plans for internal and

1 external resources to oversee and perform the work.

2

3 **Q.** How much capital did the company invest or plan to invest  
4 in the Energy Supply area in 2022 through 2024?

5

6 **A.** The company has invested or plans to invest approximately  
7 \$1.95 billion in capital in Energy Supply projects from  
8 2022 through 2024. Of that capital, approximately \$474.8  
9 million was for solar projects and the Big Bend  
10 Modernization costs approved as part of our 2021 Settlement  
11 Agreement. The remaining \$1.48 billion includes \$114.3  
12 million associated with Environmental Cost Recovery Clause  
13 ("ECRC") and Clean Energy Transition Mechanism ("CETM")  
14 projects, \$372.8 million for future solar and storage  
15 capacity as described in Mr. Stryker's testimony, and  
16 \$394.3 million for the corporate headquarters and Bearss  
17 Operation Center. The remaining \$598.6 million is related  
18 to other rate base capital and SYA projects described later  
19 in my testimony.

20

21 **Q.** What major projects are included in the total for 2022 to  
22 2024?

23

24 **A.** Major projects for 2022 to 2024 fall into eight categories.  
25 Those categories consist of outage capital; plant

1 improvement non-outage capital; blanket capital; ECRC  
2 Capital; CETM capital; AFUDC capital; building renovation  
3 capital; and other.

4  
5 **Q.** How much capital does the company expect to invest in the  
6 Energy Supply area in 2025?

7  
8 **A.** In 2025, the company is planning on spending \$845.5 million  
9 in capital to operate the generating system and address  
10 future growth safely and reliably.

11  
12 **Q.** What major outages are included in the total for 2025?

13  
14 **A.** There are three major needed outages happening in 2025.  
15 These include a 70-day major outage for Bayside Unit 1, a  
16 70-day outage for Polk Unit 2, and a one-month outage for  
17 Big Bend Unit 4.

18  
19 **Q.** Please explain each of the three major outages planned for  
20 2025, what capital work will be done, the expected cost,  
21 and why the expenditures are prudent.

22  
23 **A.** Bayside Unit 1 requires a major outage to replace the steam  
24 turbine Low Pressure ("LP"), High Pressure ("HP"), and  
25 Intermediate Pressure ("IP") rotors. Additionally, an

1 overhaul of the steam valves and an upgrade of the steam  
2 turbine controls are necessary. The total expected capital  
3 costs of the Bayside Unit 1 outage are expected to be \$14.5  
4 million. This outage is necessary because the run hours on  
5 the steam turbine are expected to be 380,000 and beyond  
6 the recommended OEM design of 250,000 hours.

7  
8 Polk Unit 2 requires a major outage to perform a steam  
9 turbine and generator major inspection, HP/IP turbine seals  
10 replacement, blade feathering, IP rotor blade  
11 replacements, and main steam valve and actuator  
12 inspections. The total capital cost for this work is  
13 anticipated to be \$6 million assuming the inspected items  
14 do not require additional capital discovered during  
15 inspection. This outage is necessary because the OEM  
16 recommends a major overhaul at 50,000 hours of operation,  
17 which includes opening and inspecting the turbine and  
18 replacement of parts as prescribed in the OEM's Technical  
19 Information Letters. This will be the first time opening  
20 the turbine since installation in 2017, and the unit is  
21 expected to be at 66,000 hours of operation when completed.  
22 These turbine overhauls are critical to maintain system  
23 reliability and efficiency.

24  
25 Big Bend Unit 4 requires a one-month outage for compressed

1 air system improvements, seawall cathodic protection,  
2 boiler circulating pump work, and intake screen  
3 replacement. The anticipated capital costs to perform this  
4 work are \$3.1 million, and it is needed to continue safe,  
5 reliable unit operation.

6  
7 **Q.** Please identify and describe the other major capital  
8 expenditures planned for 2025 in the Energy Supply area.

9  
10 **A.** In addition to outage capital, and capital needed to  
11 maintain existing equipment as well as respond to unplanned  
12 outages, capital is being devoted to solar and energy  
13 storage capacity projects described in Mr. Stryker's  
14 testimony. Capital also is needed for the SYA projects  
15 described later in my testimony and the corporate  
16 headquarters and Bearss Operation Center also described  
17 later in my testimony. Finally, capital is needed for  
18 dismantlement activities at Big Bend as part of our CETM,  
19 and a small amount of capital is needed for building  
20 renovations.

21  
22 **Q.** How does the amount of production plant for the 2025 test  
23 year compare to the amount of production plant in the  
24 company's 2021 rate case?

25

1 **A.** The production plant will increase by approximately \$1.5  
2 billion since 2021. It is projected to be \$7.8 billion in  
3 2025 versus \$6.3 billion in 2021.

4  
5 **Q.** Please describe the major production plant additions for  
6 2023, 2024, and 2025 as shown on MFR Schedules B-7, B-8,  
7 B-11, and B-12.

8  
9 **A.** For 2023, major production plant additions included \$29.6  
10 million for the Bayside Unit 1 Major Outage and Advanced  
11 Hardware Upgrades, and \$355.4 million for the final tranche  
12 of wave 2 solar.

13  
14 For 2024, major production plant additions include \$49.9  
15 million for the Bayside Unit 2 Major Outage and Advanced  
16 Hardware Upgrades, \$158.1 million for future solar, and  
17 \$20.0 million for energy storage capacity.

18  
19 For 2025, major production plant additions include \$244.9  
20 million for future solar, \$147.5 million for energy storage  
21 capacity, \$113.3 million for the South Tampa Resilience  
22 project, and \$65.5 million for Polk 1 fuel flexibility.

23  
24 The remainder of the additions for these years is  
25 attributable to prudently incurred annual sustaining

1 capital expenditures required to maintain the operational  
2 and environmental reliability of the company's existing  
3 generating fleet and so that those generating units will  
4 remain used and useful for delivery of electric service  
5 to our customers.

6  
7 **Q.** What major production plant projects are in Construction  
8 Work in Progress for 2025 as shown on MFR Schedule B-13?

9  
10 **A.** The Energy Supply Construction Work in Progress major  
11 production plant projects for 2025 include \$247 million  
12 for solar, \$55.9 million for South Tampa Resilience, \$5.8  
13 million for Polk fuel diversity and fuel flexibility  
14 projects and \$44.5 million for an environmental  
15 compliance project.

16  
17 **Q.** With these projects, what does the company expect its  
18 summer and winter reserve margins to be in 2025 and 2026?

19  
20 **A.** Tampa Electric expects its 2025 summer reserve margin to  
21 be 30.5 percent and winter reserve margin to be 22.9  
22 percent. For 2026, the summer reserve margin is expected  
23 to be 30.4 percent and the winter reserve margin to be  
24 23.1 percent.

25

1           O&M EXPENSES

2   **Q.**   How have the company's operating expenses for production  
3           changed since its last rate case?

4  
5   **A.**   The production expense has increased by \$121.0 million,  
6           the majority of which is due to increased fuel costs, and  
7           \$28.2 million is related to base rate expenditures. The  
8           increase in base rate expenditures represents a 29 percent  
9           increase above 2022 levels.

10  
11   **Q.**   What items are causing the increase in operating expenses?

12  
13   **A.**   The increase in operating expenses is driven by three major  
14           outages taking place in 2025 and incremental solar  
15           operations costs to manage the new solar sites. The  
16           necessary outage work and associated costs are described  
17           later in my testimony.

18  
19   **Q.**   What is the forecasted amount for 2025 O&M expense, and is  
20           the amount reasonable?

21  
22   **A.**   The forecasted 2025 O&M Production expense is \$809.2  
23           million, of which \$125.1 million are base rate  
24           expenditures. These expenses are necessary to operate the  
25           generation assets in a safe, reliable manner and are



1 reasonable.

2

3 **Q.** What is the performance against the O&M benchmark for 2020  
4 of the company's functional expense for production?

5

6 **A.** The production expense is higher than the benchmark by  
7 \$10.9 million. The variance compared to the benchmark is  
8 due to the timing of planned outages at the company's  
9 generating units for the continued safe, reliable operation  
10 of the units. The difference is also caused by increased  
11 solar generation that provides safe, low-cost energy to  
12 our customers.

13

14 **Q.** What steps has the company taken to reduce O&M expenses in  
15 Energy Supply?

16

17 **A.** Numerous steps have been taken to manage and reduce O&M  
18 expenses within Energy Supply. First, budgets are set in a  
19 bottom-up approach to ensure the spending is necessary and  
20 prudent and then scrutinized in a top-down manner to reduce  
21 discretionary costs. Comparisons to prior year budgets and  
22 results are evaluated, and variances must be justified and  
23 explained. An Energy Supply scorecard is developed that  
24 includes an O&M goal that incents team members to control  
25 costs. Individual generation station budgets are also

1 managed, and station scorecards are shared with team  
2 members throughout the year. In addition, an Energy Supply  
3 continuous improvement pilot initiated in 2024 encourages  
4 team members to find ways to reduce O&M expenses.

5

6 **Q.** What was the employee count for Energy Supply 2022, 2023,  
7 and 2024?

8

9 **A.** The actual employee count for Energy Supply in 2022 was  
10 581, increasing to 607 in 2023 and expected to be 613 in  
11 2024.

12

13 **Q.** What is the projected employee count for Energy Supply in  
14 2025?

15

16 **A.** Energy Supply expects employee count to remain at 613 in  
17 2025.

18

19 **Q.** What factors caused the need to change the employee count?

20

21 **A.** Changes in employee count can be attributed to changes in  
22 generating stations and workload. The retirement of Big  
23 Bend Unit 2 and Unit 3 helped reduce contractors and  
24 employee count; however, the Big Bend Modernization project  
25 and new solar sites required additional employees. The

1 increase in employee count since 2022 is primarily driven  
2 by the increase in solar technicians needed to perform  
3 maintenance on the solar sites.

4  
5 **Q.** How has Tampa Electric been able to manage its O&M  
6 benchmark for the 2025 production expenses?

7  
8 **A.** The Energy Supply organization and the company as a whole  
9 understand that O&M expense control is strategically  
10 important. Additionally, there is an inherent  
11 competitiveness between generation stations to manage  
12 their costs and achieve the best performance metrics. Work  
13 is competitively bid, and employee oversight of service  
14 contract work takes place to ensure the work is performed  
15 and billed in accordance with agreed upon terms. Preferred  
16 source contracts are rarely used and require senior  
17 leadership approval with accompanying justification.  
18 Lastly, to ensure O&M expense is an important consideration  
19 for all employees, it is an incentive goal for team members  
20 in the Energy Supply area and the Tampa Electric  
21 organization.

22  
23 **Q.** Does Tampa Electric incur O&M expenses in conjunction with  
24 a planned outage?

25

1 **A.** Yes. During planned outages there is a significant amount  
2 of work that must be performed that cannot be capitalized  
3 and is treated as O&M expense. Maintenance, as defined by  
4 FERC accounting instructions, conducted during planned  
5 outages is charged to O&M expense. Maintenance consists of  
6 large tasks that are performed infrequently and have a long  
7 duration. Typical examples are steam turbine inspections  
8 and repairs, replacement of large heat transfer surfaces  
9 in the boiler, and refurbishment of large motors and pumps.  
10 The maintenance performed during these outages is required  
11 to ensure the safe, reliable operation of the generating  
12 units.

13  
14 **Q.** What is the O&M expense for planned major outages on Tampa  
15 Electric's generating units in the 2025 test year?

16  
17 **A.** There are extensive O&M costs in major outages that are  
18 required on a regular four-to-five-year cycle, and efforts  
19 are made to stagger these outages to levelize O&M spending.  
20 For the 2025 test year, Bayside Unit 1, Big Bend Unit 4,  
21 and Polk Unit 2 have planned major outages, and the  
22 estimated cost is \$14.5 million in incremental O&M expense.

23  
24 **Q.** Please describe the work for the major planned outages in  
25 the 2025 test year that will cause O&M expenses to be

1 incurred.

2

3 **A.** The Bayside Unit 1 work is estimated to cost \$6.5 million.  
4 Big Bend Unit 4 outage work is expected to cost \$2.0  
5 million, and the Polk Unit 2 outage O&M expense is expected  
6 to cost \$6.0 million. The scope of this work includes  
7 opening and closing the casing, including vendor costs for  
8 generator and valve inspections and scaffolding. Other O&M  
9 expenses during these major outages include duct repairs;  
10 flushing lube oil and seal oil systems; valve maintenance,  
11 including internal parts replacements; motor and GSU  
12 maintenance; and, for the coal unit, cleaning ash from the  
13 precipitator and boiler slag blasting. This work is  
14 necessary and recurring during major outages.

15

16 **Q.** Has Tampa Electric taken other measures to control  
17 generation O&M costs while maintaining a safe and  
18 productive workplace?

19

20 **A.** Yes. Tampa Electric applies many different approaches to  
21 control costs, including an asset management program to  
22 manage expenses. The company focuses on centralized  
23 contractor work planning and dispatch across all three  
24 generating stations. This broader view of work demands  
25 allows for a more efficient and effective way to control

1 contractor head count and contractor spending. We perform  
2 ongoing assessments of in-house capabilities and cost-  
3 effectiveness versus an external contractor approach. We  
4 utilize internal resources to perform solar operations and  
5 maintenance activities, which has reduced costs while  
6 providing jobs for team members affected by the  
7 modernization of Big Bend.

8  
9 **Q.** Is the overall level of production O&M expense for 2025  
10 reasonable?

11  
12 **A.** Yes. O&M expenses for 2025 are reasonable and prudent. If  
13 the incremental O&M costs associated with the additional  
14 solar sites requiring operations and maintenance personnel  
15 and the three major outages are excluded, O&M expenses will  
16 be managed close to 2022 levels. We will accomplish this  
17 by carefully managing all three major outages which, by  
18 themselves, will have a \$14.5 million impact to the O&M  
19 budget. We will continue to mitigate inflation and standard  
20 labor increases by applying Asset Management procedures,  
21 implementing cost savings and continuous improvement  
22 initiatives, centralizing contractor coordination and  
23 contractor reductions. The company's O&M expenses are also  
24 mitigated by the reduction in reducing wear and tear on  
25 units due to the transition to natural gas at Big Bend and

1 conversion of Polk Unit 1 to a simple cycle natural gas  
2 unit.

3  
4 **(5) SYA PROJECTS**

5 **Q.** Please list the SYA projects for which you are responsible  
6 in this proceeding.

7  
8 **A.** I am responsible for explaining the Polk 1 Flexibility  
9 Project, the South Tampa Resilience Project, the Bearss  
10 Operations Center, and the company's new Corporate  
11 Headquarters, all of which are included in the company's  
12 proposed 2026 SYA. I also explain the Polk Fuel Diversity  
13 Project, which is included in the company's proposed 2027  
14 SYA.

15  
16 POLK 1 FLEXIBILITY PROJECT - 2026 SYA

17 **Q.** Please describe the Polk 1 Flexibility Project and why it  
18 is necessary.

19  
20 **A.** The Polk 1 Flexibility Project consists of converting our  
21 existing Polk Unit 1 CC unit to a highly efficient simple  
22 cycle unit with the latest technology to better utilize  
23 that asset. It is expected to cost \$80.5 million and to  
24 be in service in May 2025.

25

1 The Polk Unit 1 CC plant has been in operation for the  
2 past 27 years. The unit uses early GE 7FA turbine  
3 technology and is a one-of-a-kind installation because it  
4 is supplied fuel via the coal gasification process. Gas  
5 turbines like Polk Unit 1 require "major maintenance" at  
6 defined intervals set by the OEM, which is GE in this  
7 case. These maintenance intervals are determined by the  
8 number of running hours, stops, and starts. Polk Unit 1  
9 requires major maintenance in 2025 to ensure the assets  
10 remain safe and reliable. However, the existing  
11 combustion system is no longer supported by GE.

12  
13 Since 2018, Polk Unit 1 has been fueled with natural gas  
14 rather than syngas generated in the gasifier. Undertaking  
15 an "in kind" overhaul in 2025 would result in a unit that  
16 remains tied to the gasifier. The company reviewed all  
17 options and determined that converting the unit to simple  
18 cycle operation would provide the most customer benefits.  
19 This approach results in lower costs, improves the  
20 efficiency of the unit, and results in a nimbler asset that  
21 can follow system loads more quickly. In the event petcoke  
22 becomes more cost-effective than natural gas in the future,  
23 Tampa Electric retains the option to convert the unit to  
24 CC operation by modifying and performing maintenance on  
25 the HRSG.



1 Q. How will this project benefit customers?

2

3 A. The Polk Unit 1 conversion to simple cycle has an  
4 estimated fuel benefit of \$40 million, and an estimated  
5 cumulative present value revenue requirements ("CPVRR")  
6 benefit of \$166.9 million compared to maintaining the same  
7 configuration. It will have lower operating costs because  
8 of the updated and advanced technology, shifting the  
9 maintenance cycles from every 8,000 hours to every 32,000  
10 hours, and improved reliability due to the reduced  
11 maintenance intervals. The simple cycle configuration  
12 increases the unit's flexibility, allowing fast starts,  
13 increased ramp rates, and lower turndowns, which will  
14 allow the company to better optimize our lower cost system  
15 assets. The simple cycle unit will also have an improved  
16 heat rate, which along with flexibility are the main  
17 drivers for fuel savings.

18

19 SOUTH TAMPA RESILIENCE PROJECT - 2026 SYA AND 2027 SYA

20 Q. Please describe Tampa Electric's South Tampa Resilience  
21 Project.

22

23 A. The South Tampa Resilience Project is a Distributed Energy  
24 Resource ("DER") facility located on MacDill Air Force  
25 Base ("MAFB") consisting of two phases. The first phase

1 includes two Reciprocating Internal Combustion Engine  
2 ("RICE") units with a capacity of 37.6 MW and has an  
3 expected commercial in-service date of April 2025. The  
4 second phase includes two additional RICE units and an  
5 Energy Storage Capacity System. Phase 2 is expected to be  
6 in service in June of 2026. The South Tampa Resilience  
7 Project generating units will serve all Tampa Electric  
8 customers during normal operations, providing electricity  
9 to MAFB and the surrounding community. In the extremely  
10 rare event of a validated threat to the military base,  
11 this project supports national security as MAFB can be  
12 electrically islanded and entirely powered by the South  
13 Tampa Resilience Project.

14  
15 **Q.** Why is the South Tampa Resilience Project needed?  
16

17 **A.** The four reciprocating engines are quick start units that  
18 are designed to start at a moment's notice. That quick  
19 start capability provides the company flexibility to better  
20 manage its resources and additional resilience in the  
21 middle of a dense load center. MAFB provided no cost access  
22 to the site in exchange for the added level of resilience.  
23

24 **Q.** What alternatives to the project did the company consider?  
25

1 **A.** There were no alternatives to the project due to MAFB's  
2 resilience and redundancy requirements. While the load  
3 requirements for the base were only 26 MW, there was an  
4 opportunity to serve the base, help alleviate transmission  
5 constraints, and improve resilience in South Tampa by  
6 adding generation in a relatively small footprint.

7

8 **Q.** What steps did the company take to ensure the project was  
9 completed at the lowest reasonable cost?

10

11 **A.** The company followed prudent procurement practices for the  
12 South Tampa Resilience Project. All major contracts were  
13 competitively bid and thoroughly evaluated prior to  
14 contract award. Tampa Electric staffed the project with  
15 skilled project management, engineering, and construction  
16 management staff to ensure that the work was completed in  
17 an efficient, high-quality manner. Tampa Electric's site  
18 management team engages frequently with the suppliers and  
19 construction team to identify opportunities to remove  
20 obstacles and resolve potential concerns. Progress in the  
21 field is cross-checked with invoices to ensure that the  
22 project is billed consistently with the contract terms.  
23 Payment of invoices occurs only after Tampa Electric  
24 confirms that the contract requirements have been met.  
25 These practices help to ensure that Tampa Electric delivers

1 a high quality, reliable, and safe power plant at the  
2 lowest reasonable cost.

3

4 **Q.** What benefits will the project provide to customers?

5

6 **A.** The South Tampa Resilience Project strengthens the  
7 company's near-term reserve margins and further insulates  
8 customers from an extreme weather event such as winter  
9 storm Uri in Texas that occurred in February 2021 and storm  
10 Elliott along the U.S. east coast in December 2022.  
11 Additionally, customers benefit by having four cost-  
12 effective, highly reliable resources that can be dispatched  
13 instead of larger CT, more frequently resulting in fuel  
14 savings. The cumulative projected fuel savings to customers  
15 for this project is expected to be \$137.9 million.

16

17 **Q.** Will the project require new employees?

18

19 **A.** Yes. These four reciprocating engines and energy storage  
20 capacity will require five additional employees. There will  
21 be multiple shifts during the week plus weekend shifts to  
22 monitor and maintain the reciprocating engines, which will  
23 be available for dispatch around the clock.

24

25 **Q.** What is the total cost for the South Tampa Resilience

1  
2  
3  
4  
5  
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25

Project?

**A.** The total cost of the South Tampa Resilience Project excluding energy storage is forecasted to be approximately \$160 million, including AFUDC.

**Q.** Is the project prudent?

**A.** Yes. The project will help Tampa Electric maintain summer and winter reserve margins greater than 20 percent as load continues to grow. The project is expected to achieve \$137.9 million in fuel savings for customers and will provide additional resilience in a highly populated, dense load center with limited space to add transmission or new generation.

BEARSS OPERATIONS CENTER - 2026 SYA

**Q.** Please describe Tampa Electric's Bearss Operations Center and Energy Management System ("EMS") project.

**A.** The Bearss Operations Center is a modern, storm-hardened, secure operation center that will replace Tampa Electric's Energy Control Center ("ECC") and Ybor Data Center. The Bearss Operations Center and EMS project is a multi-year project to physically relocate Tampa

1 Electric's control and data centers into a single,  
2 Category 5 hurricane rated facility. This new facility is  
3 designed to withstand major hurricanes, protect all  
4 company cyber assets, and operate the utility command and  
5 control capabilities for the next 40 years. The project  
6 includes EMS upgrades, such as new map boards and  
7 dispatching consoles, to properly match the operating  
8 assets within the Bearss Operations Center.

9  
10 **Q.** Please describe Tampa Electric's existing ECC.

11  
12 **A.** Tampa Electric's ECC became operational in 1989. The  
13 facility houses the company's grid operations functions.  
14 The building was designed using 1980s technology and  
15 building codes, and the existing ECC is approaching the  
16 end of its useful life.

17  
18 **Q.** Please describe Tampa Electric's existing Ybor Data  
19 Center.

20  
21 **A.** Tampa Electric's Ybor Data Center also became operational  
22 in 1988. This facility serves as Tampa Electric's prime  
23 data center and customer contact center. The building was  
24 designed using 1980s technology and building codes. Like  
25 the existing ECC, this facility is not hardened to

1           withstand a major hurricane and is located within a storm  
2           evacuation zone.

3

4   **Q.**    Why did the company conclude that it needed to replace the  
5           ECC and Ybor Data Center?

6

7   **A.**    The company's decision is based on three main factors -  
8           storm resilience, space needs, and strategic objectives.

9

10   **Q.**    How will construction of the Bearss Operations Center  
11           improve storm resilience?

12

13   **A.**    The existing ECC is at risk from high storm surge. The  
14           facility is in Hillsborough County evacuation zone B and  
15           is located just a half mile from the Palm River, which  
16           directly connects to Tampa Bay. If a major hurricane  
17           tracked directly into Tampa Bay, the ECC would not be able  
18           to withstand the wind speeds and storm surge expected in  
19           its location, meaning the company would be forced to  
20           relocate operations control to the company's much smaller  
21           alternate Secure Center. Similarly, the Ybor Data Center  
22           is located only a short distance from Tampa Bay and would  
23           be subject to high winds and storm surge in the event of a  
24           major hurricane tracking into Tampa Bay. The new Bearss  
25           Operations Center will be located in a safer, higher, and

1 more inland location and will be designed to withstand  
2 major hurricane winds up to 171 mph sustained.

3  
4 **Q.** What are the company's space needs that drive the need for  
5 the Bearss Operations Center?

6  
7 **A.** In 2021, the company performed an assessment of the space  
8 necessary to accommodate current and future operations  
9 functions. The assessment concluded that the existing ECC  
10 was at its maximum capacity, with limited space to expand  
11 for customer growth and emerging business requirements.

12  
13 **Q.** What are the strategic objectives that drive the need for  
14 the Bearss Operations Center?

15  
16 **A.** The Bearss Operations Center is designed to accommodate  
17 the company's future grid reliability requirements and grid  
18 decentralization. The facility will incorporate new  
19 industry best practices, including a Renewables Control  
20 Center ("RCC") and a Diagnostic and Drone Center ("DDC").  
21 The company also will be able to implement an EMS upgrade  
22 to properly match the operating assets within the Bearss  
23 Operations Center, such as new map boards and dispatching  
24 consoles.

25



1 **Q.** How did the company determine that the Bearss Operations  
2 Center Project is the best option to address the  
3 resilience, space, and strategic needs you described?  
4

5 **A.** Tampa Electric implemented a systematic approach to  
6 evaluate how to address these needs. This approach included  
7 several steps.  
8

9 First, Tampa Electric sought industry-wide advice and input  
10 from our Southeastern Electric Exchange and North American  
11 Transmission Forum Partners and conducted site reviews of  
12 several control centers to support information gathering.  
13

14 Second, the company issued a RFP from reputable and  
15 experienced Architecture and Engineering ("A&E") firms  
16 with expertise in programming, evaluating, and designing  
17 Control Centers and Data Centers. Tampa Electric ultimately  
18 selected an A&E firm through this process.  
19

20 Third, Tampa Electric and the A&E firm worked together in  
21 two phases to select the best option to address these  
22 needs.  
23

24 **Q.** Please describe the two phases in the selection process.  
25

1 **A.** In Phase I, Tampa Electric and the A&E contractor worked  
2 together to evaluate existing Tampa Electric facilities  
3 and future space plans for those facilities; potential new  
4 site locations; and conceptual site layouts. Site location  
5 criteria included size, security risk, flood zone, storm  
6 surge exposure, topography, environmental conditions,  
7 distance from strongest winds from hurricane, employee  
8 commute, site ingress and egress, proximity to major  
9 highways, proximity to load center, water supply, and relay  
10 service capability.

11  
12 In Phase II, the company considered the location options  
13 and criteria identified in Phase I and developed site and  
14 building construction documents for the new facility and  
15 for renovations of existing facilities.

16  
17 At the end of this process, Tampa Electric determined that  
18 the Bearss location was the best option to meet the  
19 company's needs.

20  
21 **Q.** Why was the Bearss location selected as the best option?  
22

23 **A.** As previously stated, the current ECC and Grid Control  
24 Center has reached its end of useful life as it is  
25 approaching 40 years old using 1980's technology and

1 building codes. A modern, more resilient, storm-hardened  
2 facility will allow Tampa Electric to respond faster to  
3 customer outages without having to recover its own control  
4 of the grid first. The design for the new facility also  
5 considered other potential threats such as physical,  
6 biological, and chemical, to further enhance the resilience  
7 of the facility. The ability to implement new technologies  
8 will provide customers with more reliable service in both  
9 'blue sky' and 'black sky' conditions. It will also serve  
10 to attract and retain the best and brightest employees to  
11 implement, operate, and maintain these new technologies.

12  
13 **Q.** Please explain the process Tampa Electric employed for  
14 awarding contracts for the construction and design of  
15 Bearss Operations Center.

16  
17 **A.** In accordance with Tampa Electric procurement processes  
18 and procedures, the company identified an initial list of  
19 potentially qualified candidates and sent RFP to these  
20 candidates. From these RFP, the company evaluated each  
21 candidate based on experience, expertise, and capability,  
22 along with pricing. In the case of the design team, each  
23 candidate was provided with a full description of the  
24 project and with detailed requirements. Once the detailed  
25 design documents were developed with the successful design

1 team, this information was provided to the list of  
2 potential construction candidates for their submittal.  
3 Each construction submittal was evaluated based on  
4 experience, expertise, and capability, along with pricing.

5

6 **Q.** What is the total project cost for the Bearss Operations  
7 Center and EMS project?

8

9 **A.** The total project cost for the Bearss Operations Center  
10 and the EMS project is \$335.0 million. The budgeted costs  
11 are as follows.

12

13	Land Acquisition Costs	\$ 10.9 million
14	Architectural Services	\$ 6.1 million
15	Facility Construction Costs	\$224.1 million
16	EMS	\$ 27.6 million
17	IT & Telecomm Costs	\$ 24.1 million
18	Other Owners Costs	\$ 22.9 million
19	Contingency	\$ 19.3 million
20	Total	\$335.0 million

21

22 **Q.** Please provide a background of the purpose of EMS and why  
23 the upgrade is needed.

24

25 **A.** The upgrade is necessary for several reasons. First, the

1 current version of the EMS software does not have the  
2 capabilities to support the grid's overall performance and  
3 will be going out of support. The existing version of EMS  
4 went in-service in 2017. Typically, Tampa Electric upgrades  
5 the EMS environment every seven years to stay current with  
6 industry requirements and the evolution of information  
7 technologies. Second, the BOC facility will have new  
8 situational awareness features such as visual displays,  
9 alarming features, operator consoles, and training  
10 simulators, all needing a new EMS configuration to ensure  
11 system monitoring and control integrity. Finally, the  
12 latest release of the EMS platform offers new  
13 functionalities.

14  
15 **Q.** What new benefits will customers see from the EMS Upgrade?

16  
17 **A.** There are numerous customer benefits for the new EMS  
18 Upgrade. As mentioned above, the new EMS system will  
19 provide new functionalities. These include features that  
20 will strengthen and modernize the grid; provide flexibility  
21 to accommodate new technology options and advancements;  
22 optimize the use of our generation system by incorporating  
23 energy storage capabilities, improving the generation and  
24 transmission of renewables; provide Wide Area Monitor  
25 System ("WAMS") capabilities that provide insights on

1 system oscillations and inertia, allowing the company to  
2 proactively identify and address system stability issues;  
3 and provide Intelligent Alarm Processes ("IAPS") that will  
4 enable faster and more informed decision making during  
5 abnormal system conditions. This upgrade will have the  
6 additional benefits of coupling EMS to a new operation  
7 center expanding situational awareness, expanding  
8 controls, and driving broader customer reliability  
9 satisfaction.

10  
11 This upgrade will also enhance the company's dispatching  
12 capabilities by providing:

- 13 1. Access up-to-date forecasts for renewable energy  
14 production.
- 15 2. Utilize renewable energy dispatch to manage  
16 congestion, stability, and other factors.
- 17 3. Improve equipment lifespan, reduce losses, and  
18 enhance security through VAR dispatch.
- 19 4. Control battery charging and dispatch.
- 20 5. Enable the Distributed Energy Resource System  
21 (DERMS).
- 22 6. Efficiently manage different types of assets, such as  
23 storage and solar power.
- 24 7. Model energy storage systems and renewable energy  
25 sources.

1           8. Use forecasted values when real-time data is not  
2           available.

3

4   **Q.**    What is the status of the Bearss Operation Center?

5

6   **A.**    The Bearss Operation Center is currently under construction  
7           with an anticipated in-service date of June 2025. As of  
8           December 2023, the construction project is approximately  
9           20 percent complete. By the end of 2024, the Bearss  
10          Operation Center is expected to be 90 percent complete.

11

12          The EMS project started in January 2023 and is  
13          approximately 32 percent complete. The EMS in-service date  
14          aligns with the first day of dispatching, which is expected  
15          to be October 1, 2025.

16

17   **Q.**    What is the estimated certificate of occupancy date for  
18          the Bearss Operation Center?

19

20   **A.**    The estimated certificate of occupancy for the Bearss  
21          Operation Center is May 29, 2025.

22

23   **Q.**    How will the Bearss Operations Center benefit customers?

24

25   **A.**    The Bearss Operation Center project is part of Tampa

1 Electric's continuing effort to improve the efficiency,  
2 resiliency, and reliability of its facilities. Tampa  
3 Electric's customers will see many benefits from the  
4 project. As I mentioned previously, the current ECC and  
5 Grid Control Center is nearly 40 years old and has reached  
6 the end of its useful life. Having a more resilient, storm  
7 hardened facility will allow Tampa Electric to respond  
8 faster to customer outages without the need to relocate  
9 to the backup control center. The design for the new  
10 facility also considered other potential threats such as  
11 physical, biological, and chemical, to further enhance  
12 the resilience of the facility. The ability to implement  
13 new technologies will provide customers with more  
14 reliable service in both blue sky and black sky  
15 conditions. It will also serve to attract and retain the  
16 best and brightest employees to implement, operate, and  
17 maintain these new technologies.

18  
19 Tampa Electric Corporate Headquarters - 2026 SYA

20 **Q.** Please describe Tampa Electric's Corporate Headquarters  
21 Project ("Corporate Headquarters").

22  
23 **A.** Tampa Electric is relocating its corporate headquarters  
24 from its current location in TECO Plaza in Downtown Tampa  
25 to a new 18-story tower in Midtown Tampa. Tampa Electric



1 will purchase a portion of the new tower as well as the  
2 rights to approximately 740 parking spaces. The new  
3 corporate headquarters will house Tampa Electric and our  
4 affiliate Peoples Gas System, Inc. ("Peoples"). Tampa  
5 Electric will occupy six floors, Peoples will occupy three  
6 floors, and employees of both will share two assembly  
7 floors containing meeting rooms and amenities for both  
8 companies. Each company will own its share of the tower.  
9 Construction of the new tower is still underway, and Tampa  
10 Electric expects to receive a Certificate of Occupancy in  
11 the Summer of 2025 with an anticipated in-service date of  
12 June 1, 2025.

13  
14 **Q.** Why is the Corporate Headquarters project necessary?

15  
16 **A.** Tampa Electric has leased TECO Plaza for 40 years. The  
17 company's existing lease expires in 2025. As the expiration  
18 date for the lease approached, the company began a formal  
19 process to evaluate multiple options for the company's  
20 future corporate headquarters needs. At the end of this  
21 process, the company determined that the new Corporate  
22 Headquarters was the best option for both the company and  
23 for customers.

24  
25 **Q.** Please describe the process the company used to evaluate

1 the options to meet its corporate office needs.

2

3 **A.** Tampa Electric formed an internal team of 18 members that  
4 partnered with Colliers International to explore the option  
5 to lease or own several buildings in the Tampa area. These  
6 locations included TECO Plaza as well as other buildings  
7 in Midtown Tampa, the Water Street District, International  
8 Plaza, and Tampa Heights. The internal team developed ten  
9 scoring criteria for each option including resilience and  
10 security, connection to community, walkability, parking,  
11 nearby amenities, talent recruitment, dedicated elevators,  
12 dedicated lobby, building signage, and sustainability. The  
13 team then heard presentations from developers and scored  
14 all options according to these criteria. A copy of the  
15 final scorecard for all options is included as Document  
16 No. 8 of my exhibit. Based on this scoring, the team  
17 selected the Midtown location as the best option to meet  
18 the company's office space needs.

19

20 **Q.** How will customers benefit from the Corporate Headquarters  
21 project?

22

23 **A.** The Corporate Headquarters project is part of Tampa  
24 Electric's continuing effort to improve the efficiency,  
25 sufficiency, and adequacy of its facilities. Customers will

1 benefit from this project in several ways. First, owning  
2 office space is a better value proposition for customers  
3 than leasing because it should result in the accumulation  
4 of equity. Second, the Midtown location provides greater  
5 resilience in harsh weather conditions as compared to TECO  
6 Plaza because of its inland location and because it will  
7 be built to modern code standards. Third, the Midtown  
8 location offers modern facilities, dedicated parking, and  
9 more efficient floor layouts that will accommodate more  
10 team members, reduce space needs in the future, and improve  
11 employee satisfaction, which should result in lower  
12 employee turnover and costs. Finally, the new headquarters  
13 will provide flexibility by providing Tampa Electric with  
14 a right of first refusal to lease vacant space on other  
15 floors in the building and the right to sublease portions  
16 of the floors it will own if they are not needed.

17  
18 **Q.** Did the company consider renovating or upgrading the  
19 existing office space in TECO Plaza?

20  
21 **A.** Yes, we considered improving the existing office space,  
22 and the internal team determined that this was not in the  
23 best interests of the company or customers. The primary  
24 basis for this decision is that the cost of completing a  
25 project to upgrade TECO Plaza to modern standards and

1 extending the existing lease agreement would be similar to  
2 purchasing the new office space in Midtown. Furthermore,  
3 there are several issues with TECO Plaza that would not be  
4 resolved by a renovation project. First, TECO Plaza's  
5 location in Downtown Tampa does not offer the same level  
6 of resilience as the new Corporate Headquarters location.  
7 This is especially concerning because the company's  
8 critical backup systems are located below mean sea level  
9 in the basement of the building. Second, the company's  
10 employee count is expected to eventually surpass the  
11 available footprint of the building. Third, TECO Plaza does  
12 not offer dedicated employee parking, which imposes an  
13 additional cost on employees. The lack of available space  
14 and parking can in turn cause issues with employee  
15 recruitment and retention and safety concerns for employees  
16 needing to walk to remote parking lots.

17  
18 **Q.** What is Tampa Electric's cost for the Corporate  
19 Headquarters Project?

20  
21 **A.** Tampa Electric's cost is \$188.7 million, which includes  
22 the purchase of six entire floors and the pro-rated cost  
23 for the two floors shared with Peoples in the building  
24 tower, the rights to 740 parking spaces, and the completion  
25 of the interior floors.

1 Q. How does this cost compare to the other options considered?

2

3 A. Tampa Electric performed a net present value revenue  
4 requirement calculation for the new Corporate Headquarters  
5 and for scenarios in which the company renovates TECO Plaza  
6 and remains in that building and eventually purchases the  
7 existing building. As shown in Document No. 9 of my  
8 exhibit, the three scenarios are nearly equivalent in terms  
9 of cost over the next 30 years.

10

11 Q. What steps did the company take to ensure that it is  
12 obtaining the lowest reasonable cost for the design and  
13 construction of the Corporate Headquarters project?

14

15 A. In late 2020, anticipating the need for design services,  
16 Tampa Electric conducted a Request For Information  
17 ("RFI") in 2021 to select architects. During the process  
18 we interviewed architects with significant experience in  
19 the utility industry, including AECOM, Song & Associates,  
20 RE Lamb, Gensler, and HDR. Ultimately, Gensler was  
21 selected based on Tampa Electric's detailed evaluation  
22 criteria, which included account cost, project management  
23 skills, staffing, work plans, and quality control. Once  
24 Tampa Electric selected the Midtown location with advice  
25 from Gensler and Colliers International, the company

1 worked with the Midtown building developers (Bromley and  
2 Highwoods Properties) to competitively select a  
3 contractor for the construction of the project. Tampa  
4 Electric evaluated a pool of five companies, including JE  
5 Dunn, Kast, Barr and Barr, DPR, and Brasfield and Gorrie.  
6 The company selected Brasfield and Gorrie based on over  
7 two dozen criteria used to evaluate the teams and pricing.  
8

9 **Q.** Why doesn't Tampa Electric continue to lease its existing  
10 building?  
11

12 **A.** Continuing to lease an aging building that was designed  
13 over 40 years ago, without parking infrastructure and with  
14 outdated systems and susceptible to low levels of flood  
15 waters, is not in Tampa Electric's best interest. Internal  
16 financial analyses were performed for an own versus lease  
17 scenario, which demonstrated that the purchase option  
18 provided a similar net present value ("NPV") value over  
19 a 30-year period.  
20

21 POLK FUEL DIVERSITY PROJECT - 2027 SYA

22 **Q.** Please describe the Polk Fuel Diversity Project and why  
23 it is necessary.  
24

25 **A.** Two of the five CT at Polk already have liquid fuel

1 capabilities. The Polk Fuel Diversity project is a  
2 strategic effort to add additional fuel diversity to our  
3 generation mix at Polk by adding the same dual fuel  
4 capabilities to the remaining three CT using  
5 infrastructure that is already in place at the site. In  
6 the last five years Tampa Electric has retired two  
7 pulverized coal units, placed one in long-term reserve,  
8 and converted one into a highly efficient natural gas  
9 combined cycle unit. Now, over 80 percent of Tampa  
10 Electric's generation is fueled by natural gas. This  
11 project helps to mitigate fuel supply disruption risk and  
12 energy demand in excess of natural gas supply and  
13 transportation capability.

14  
15 **Q.** What will the Polk Fuel Diversity project cost?

16  
17 **A.** This project is estimated to cost approximately \$53.9  
18 million.

19  
20 **Q.** What options did the company consider before undertaking  
21 this project?

22  
23 **A.** The company explored multiple options for mitigating  
24 these risks and determined that adding additional liquid  
25 fuel capacity to the remaining three CT was the most cost-

1 effective option. Initial screening options included the  
2 evaluation of capacity and storage, liquified natural gas  
3 ("LNG") storage, incremental firm gas transportation,  
4 solid fuel generation, purchased power, transmission, and  
5 renewable generation. After removing options that were  
6 too expensive or did not mitigate the fuel risk, the  
7 remaining viable options were LNG or oil.

8  
9 Tampa Electric initially considered using LNG in a local  
10 storage facility to meet the backup fuel supply need.  
11 While this approach provided significant backup supply  
12 optionality and avoided generation unit modifications to  
13 burn liquid fuel, high capital expense and long-term O&M  
14 cost uncertainty coupled with permitting complexities and  
15 potential community opposition eliminated liquified  
16 natural gas as a viable option.

17  
18 Tampa Electric also explored constructing an oil pipeline  
19 from the Port of Tampa Bay petroleum storage tanks to  
20 Bayside and adding liquid fuel capability to the CT and  
21 aero derivative units. This solution was appealing since  
22 it used existing assets and large quantities of oil  
23 located relatively close to the station. However, this  
24 option is not viable due to permitting uncertainty of  
25 constructing an oil pipeline under the shipping channel



1 and terminal suppliers' unwillingness to commit large  
2 storage volumes reserved for Tampa Electric.

3  
4 This left the options of adding oil to Polk--where oil  
5 tanks already exist and two units are dual fuel capable--  
6 -or build new fuel oil capacity adjacent to Tampa Bay at  
7 either Bayside or Big Bend. Using Polk is the most logical  
8 option due to its inland location and existing  
9 infrastructure for operating and maintaining units with  
10 liquid fuel capability.

11  
12 **Q.** How will this project benefit customers?

13  
14 **A.** The Polk Fuel Diversity project is part of Tampa  
15 Electric's continuing effort to improve the efficiency,  
16 sufficiency, and adequacy of its facilities. This project  
17 will mitigate our customers' exposure to natural gas  
18 supply disruption risk. Adding additional backup liquid  
19 fuel capacity at Polk reduces Tampa Electric customers'  
20 risk of interruption from events including terrorism,  
21 cybersecurity, a major operational natural gas pipeline  
22 failure, or an extreme weather event like storm Uri that  
23 hit Texas in February of 2021 or storm Elliott that  
24 impacted the entire east coast of the United States in  
25 December 2022. Tampa Electric has a strong, diversified

1 natural gas supply and transportation portfolio. But  
2 should an extreme event interrupt fuel supply or  
3 significantly increase demand in Florida, Tampa Electric  
4 will need all its resources, including additional oil at  
5 Polk, to overcome the loss of supply or with the dramatic  
6 increase in demand. The project is anticipated to be in  
7 service December 1, 2026.

8  
9 **(6) SUMMARY**

10 **Q.** Please summarize your direct testimony.

11  
12 **A.** My direct testimony provides an overview of the company's  
13 generating system and its evolution over the past decade  
14 to improve the reliability and efficiency of its  
15 generating assets resulting in significant fuel savings  
16 for customers. I describe how the company's capital budget  
17 for 2024 and projections for 2025 and beyond are  
18 reasonable and prudent. I also demonstrate that the  
19 company's proposed O&M expenses for Energy Supply in the  
20 2025 test year are reasonable and prudent. I describe  
21 important capital projects that the company has placed in  
22 service to improve fuel diversity, resilience,  
23 reliability, customer experience, and environmental  
24 profile that are prudent and in the best interest of our  
25 customers.

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Finally, I cover five SYA projects that are needed for generating system flexibility that results in fuel savings for customers, fuel diversity to generating systems, and resilience in a period of larger and more intense storms. While the company has been fortunate not to experience a direct impact from a major hurricane, it is crucial that we have an operations center and headquarters that are hardened and in non-flood prone areas so that the company can respond and restore service to customers during such an event.

**Q.** Does this conclude your direct testimony?

**A.** Yes, it does.

**EXHIBIT**

**OF**

**CARLOS ALDAZABAL**

**Table of Contents**

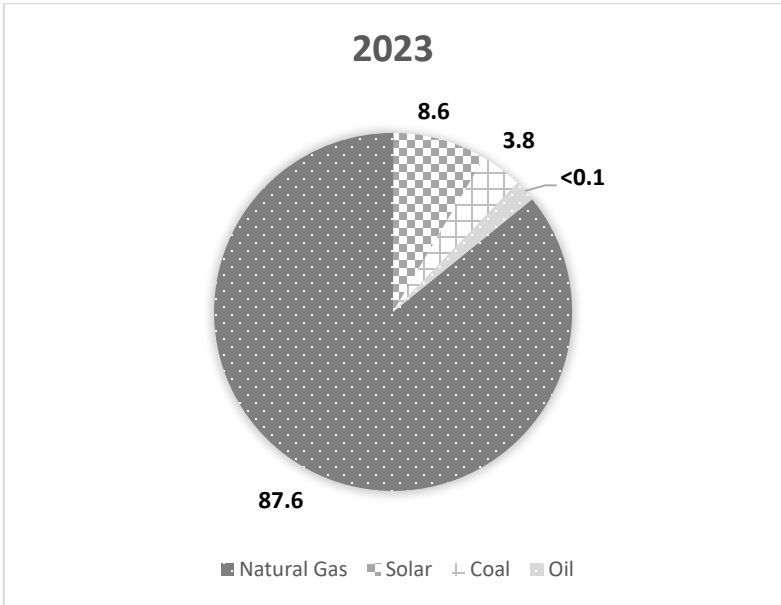
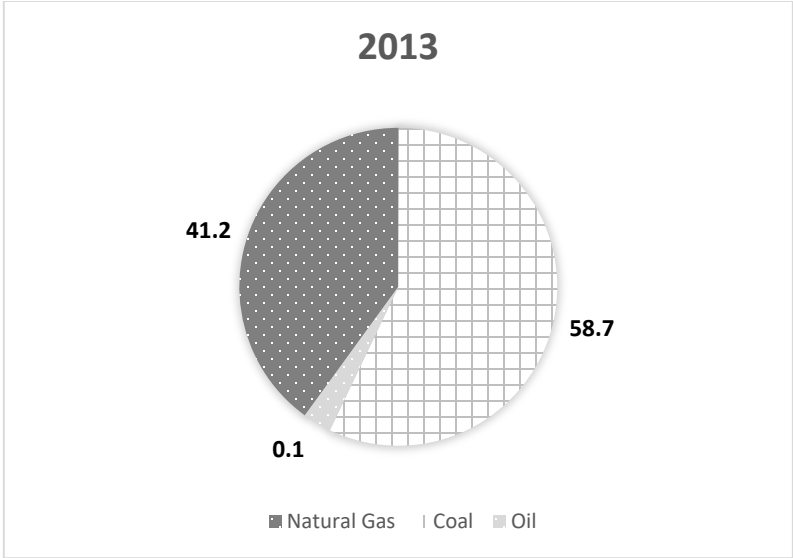
<b>DOCUMENT NO.</b>	<b>TITLE</b>	<b>PAGE</b>
1	List of Minimum Filing Requirement Schedules Sponsored or Co-Sponsored by Carlos Aldazabal.	75
2	Generation Mix	77
3	Total System Heat Rate (2013-2023)	78
4	Total CO <sub>2</sub> Emissions (2013-2023)	79
5	System Heat Rate and Fuel Savings	80
6	Total System Net EAF Percentage	81
7	Solar Projects 2021-2023	82
8	Headquarters Evaluation Scorecard	83
9	Headquarters Evaluation	84
10	Energy Supply Capital Expense Summary 2022-2025	85

LIST OF MINIMUM FILING REQUIREMENT SCHEDULES  
SPONSORED OR CO-SPONSORED BY CARLOS ALDAZABAL

MFR Schedule	Title
B-02	Rate Base Adjustments
B-06	Jurisdictional Separation Factors-Rate Base
B-07	Plant Balances By Account And Sub-Account
B-08	Monthly Plant Balances Test Year-13 Months
B-09	Depreciation Reserve Balances by Account And Sub-Account
B-10	Monthly Reserve Balances Test Year-13 Months
B-11	Capital Additions And Retirements
B-12	Production Plant Additions
B-13	Construction Work In Progress
B-15	Property Held For Future Use-13 Month Average
B-18	Fuel Inventory By Plant
B-24	Leasing Arrangements
C-04	Jurisdictional Separation Factors-Net Operating Income
C-06	Budgeted Versus Actual Operating Revenues And Expenses
C-08	Detail Of Changes In Expenses
C-09	Five Year Analysis-Change In Cost

<b>MFR Schedule</b>	<b>Title</b>
C-16	Outside Professional Services
C-33	Performance Indices
C-34	Statistical Information
C-37	O & M Benchmark Comparison By Function
C-38	O & M Adjustments By Function
C-39	Benchmark Year Recoverable O&M Expenses by Function
C-40	O&M Compound Multiplier Calculation
C-41	O&M Benchmark Variance by Function
F-05	Forecasting Models
F-08	Assumptions

### Change in Generation Mix 2013 vs 2023



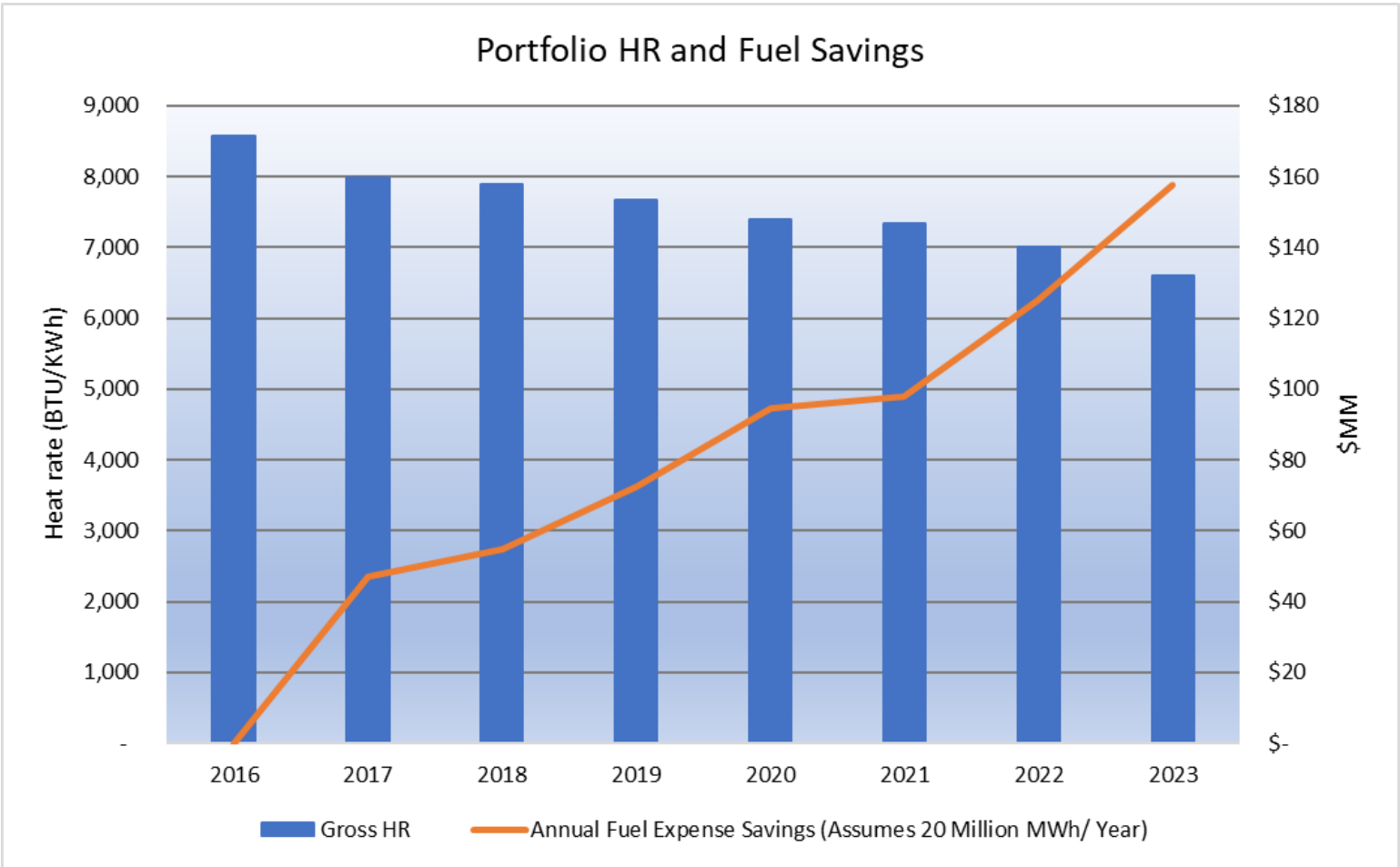


Total System Heat Rate  
(2013-2023)

Total System	Net Heat Rate
2013	9,277
2014	9,322
2015	9,057
2016	9,186
2017	8,488
2018	8,259
2019	7,918
2020	7,599
2021	7,555
2022	7,202
2023	6,755
<b>Average</b>	8,238
<b>Max</b>	9,322
<b>Min</b>	6,755

Total CO<sub>2</sub> Emissions (2013-2023)

Year	CO2 Total (tons)	Reduction from 2013 (tons)	Reduction from 2013 (%)
2013	15,685,795	-	
2014	16,214,881	(529,086)	-3%
2015	15,281,846	403,949	3%
2016	13,648,898	2,036,897	13%
2017	13,253,306	2,432,489	16%
2018	11,844,601	3,841,194	24%
2019	9,301,229	6,384,566	41%
2020	8,814,554	6,871,241	44%
2021	8,930,745	6,755,050	43%
2022	8,834,398	6,851,397	44%
2023	8,269,985	7,415,810	47%



Total System Net EAF Percentage

2017	77.75
2018	80.47
2019	84.22
2020	81.32
2021	82.03
2022	82.84
2023	81.34
Average	81.42
Max	84.22
Min	77.75

## Solar Project 2021 -2023

<u>Project</u>	<u>MW</u>	<u>Cost (Millions)</u>	<u>In-Service Date</u>
Magnolia	74.5	\$95.4	12/14/2021
Big Bend II Ph1	31.5	\$43.1	1/2/2022
Mountain View	54.6	\$81.2	4/11/2022
Jamison	74.5	\$106.4	4/30/2022
Laurel Oaks	61.2	\$81.1	12/1/2022
Riverside	55.2	\$80.1	12/17/2022
Big Bend II Ph2	14.3	\$20.2	11/21/2022
Juniper	70.0	\$99.2	12/1/2023
Alafia	60.0	\$87.9	12/1/2023
Lake Mabel	74.5	\$101.2	12/1/2023
Dover	25.0	\$43.3	12/1/2023
<b>Total</b>	<b>595.3</b>	<b>\$839.1</b>	

**Corporate Headquarters Scorecard**

Average Team Member Scores							
HQ - TEC Criteria	Points	Multiplier	Plaza	Mid-Town	Water Street	International Plaza	Max Points
<i>Connection to Community</i>	10	10	49	81	80	63	100
<i>Parking</i>	10	9	20	84	55	75	90
<i>Nearby Amenities</i>	10	8	48	69	54	59	80
<i>Talent Recruitment</i>	10	7	35	59	59	47	70
<i>Security and Resiliency</i>	10	6	34	51	41	43	60
<i>Walkability</i>	10	5	31	41	35	34	50
<i>Dedicated Lobby</i>	10	4	26	33	32	31	40
<i>Building Signature</i>	10	3	21	28	26	24	30
<i>Dedicated Elevators</i>	10	2	19	19	18	17	20
<i>Sustainability</i>	10	1	5	9	9	9	10
<i>Final Score</i>			287	474	408	402	550
<i>Percentage</i>			52%	86%	74%	73%	

**Headquarters Evaluation  
Summary of Analysis**

	<b>Plaza Lease</b>	<b>Plaza Purchase</b>	<b>Midtown Purchase</b>
<b>Total Capital</b>	\$154.7M	\$216.9M	\$255.0M
<b>Avg. Maintenance Capital</b>	\$0.6M	\$0.6M	\$0.1M
<b>Average O&amp;M</b>	\$10.4M	\$8.8M	\$3.6M
<b>AFUDC Earned</b>	-	-	\$16.0M
<b>Terminal Value Assumed</b>	\$0.0M	\$62.2M	\$255.0M
<b>Financial Results:</b>			
IRR	5.88%	6.10%	8.51%
NPV	(\$14.4M)	(\$13.0M)	\$32.7M
<b>Financial Impact to Customers:</b>			
30 Year NPV of Revenue Requirement	\$283.1M	\$274.9M	\$284.1M
60 Year NPV of Revenue Requirement	\$331.8M	\$325.4M	\$345.6M

\* includes \$62.2M for Plaza purchase in 2044

Tampa Electric Portion	<b>Plaza Lease</b>	<b>Plaza Purchase</b>	<b>Midtown Purchase</b>
<b>Total Capital</b>	\$114.5M	\$160.5M	\$188.7M
<b>Avg. Maintenance Capital</b>	\$0.5M	\$0.5M	\$0.0M
<b>Average O&amp;M</b>	\$7.7M	\$6.5M	\$2.7M
<b>AFUDC Earned</b>	-	-	\$11.9M
<b>Terminal Value Assumed</b>	\$0.0M	\$46.1M	\$188.7M
<b>Financial Results:</b>			
IRR	5.88%	5.88%	8.51%
NPV	(\$10.6M)	(\$10.6M)	\$24.2M
<b>Financial Impact to Customers:</b>			
30 Year NPV of Revenue Requirement	\$209.5M	\$203.4M	\$210.2M
60 Year NPV of Revenue Requirement	\$245.5M	\$240.8M	\$255.7M

\* includes \$46.1M for Plaza purchase in 2044

**Tampa Electric**  
**ENERGY SUPPLY**

	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>Total 2022-2024</b>	<b>2025</b>	<b>Total 2022-2025</b>
<b>Total Capital</b>	521,316,096	701,322,870	730,475,644	<b>1,953,114,611</b>	845,454,015	<b>2,798,568,626</b>
ECRC	(6,692,230)	(22,688,020)	(6,875,767)	<b>(36,256,017)</b>	-	<b>(36,256,017)</b>
CETM	(11,367,712)	(42,987,391)	(23,656,329)	<b>(78,011,433)</b>	(33,255,933)	<b>(111,267,366)</b>
AFUDC - Settlement	(282,169,756)	(188,505,812)	(4,131,097)	<b>(474,806,665)</b>	-	<b>(474,806,665)</b>
AFUDC - Non-Settlement	(114,728,718)	(292,670,430)	(569,236,729)	<b>(976,635,877)</b>	(653,875,008)	<b>(1,630,510,885)</b>
<b>Base Rate</b>	<b>106,357,680</b>	<b>154,471,217</b>	<b>126,575,721</b>	<b>387,404,619</b>	<b>158,323,074</b>	<b>545,727,693</b>
<u>Base Rate Projects</u>						
BLANKETS	18,239,969	30,784,668	16,616,272	<b>65,640,909</b>	21,780,348	<b>87,421,257</b>
BUILDING RENOVATION CAPITAL	6,628,123	13,220,112	20,362,978	<b>40,211,213</b>	8,437,405	<b>48,648,619</b>
OTHER	4,641,156	1,530,448	9,426,741	<b>15,598,344</b>	17,055,632	<b>32,653,977</b>
OUTAGE	44,033,047	73,716,115	48,362,415	<b>166,111,577</b>	67,550,865	<b>233,662,442</b>
PLANT IMPROVEMENT (NON-OUTAGE)	25,060,744	33,938,889	28,714,147	<b>87,713,780</b>	33,320,409	<b>121,034,189</b>
SOLAR OPERATIONS	2,607,392	6,044,796	3,093,168	<b>11,745,355</b>	4,178,415	<b>15,923,770</b>
SOLAR	5,147,250	(4,763,810)	-	<b>383,440</b>	-	<b>383,440</b>
FUTURE SOLAR LAND	-	-	-	-	6,000,000	<b>6,000,000</b>
<b>TOTAL</b>	<b>106,357,680</b>	<b>154,471,217</b>	<b>126,575,721</b>	<b>387,404,619</b>	<b>158,323,074</b>	<b>545,727,693</b>
	-	-	-	-	-	-
<u>AFUDC - Non-Settlement</u>						
SYA	43,357,326	197,981,078	317,523,227	<b>558,861,632</b>	200,983,090	<b>759,844,722</b>
KRIS AFUDC	46,840,600	90,283,072	235,661,381	<b>372,785,052</b>	349,066,641	<b>721,851,693</b>
FUTURE YEAR	-	-	3,611,610	<b>3,611,610</b>	103,825,277	<b>107,436,887</b>
AGP UPGRADES	24,530,792	4,406,280	12,440,511	<b>41,377,583</b>	-	<b>41,377,583</b>
	\$ 114,728,718	\$ 292,670,430	\$ 569,236,729	\$ 976,635,877	\$ 653,875,008	\$ 1,630,510,885