BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for determination that the Osprey Plant acquisition or, alternatively, the Suwannee Simple Cycle Project is the most cost effective generation alternative to meet remaining need prior to 2018, by Duke Energy Florida, Inc.	DOCKET NO. 150043-EI FILED: May 6, 2015

DUKE ENERGY FLORIDA, INC.'S PREHEARING STATEMENT

Pursuant to the Order Establishing Procedure, Order No. PSC-15-0110-PCO-EI, issued February 20, 2015 (the "OEP"), Duke Energy Florida, Inc. ("DEF" or the "Company") submits its Prehearing Statement and states as follows:

A. APPEARANCES:

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B. WITNESSES AND EXHIBITS:

In identifying witnesses and exhibits herein, DEF reserves the right to call such other witnesses and to use such other exhibits as may be identified in the course of discovery and preparation for the final hearing in this matter.

1. WITNESSES.

Direct Testimony.

Witness[1]	Subject Matter	Issues
Mark E. Landseidel	Describes and explains the site and unit characteristics for the Suwannee Simple Cycle combustion turbine project. Also explains the estimated costs and projected in-service dates for the Suwannee Simple Cycle Project.	4
Edward L. Scott	Provides an overview of the transmission system impacts and costs for the Osprey Plant acquisition and the Suwannee Simple Cycle Project. Also addresses the transmission analysis process and the transmission system impacts associated with additional supply-side generation alternatives that the Company evaluated prior to choosing the Osprey Plant acquisition and, alternatively, the Suwannee project.	2, 4

[1] Indicates proposed sequence for witness testimony presentation at the final hearing.

Kevin E. Delehanty	Describes the process for developing the Fundamental Forecast and explains why the Fundamental Forecast is a reasonable long-term fuels price forecast for DEF to use in making its resource planning decisions.	2, 4
Kris G. Edmondson	Describes the Osprey Plant technology and location and the due diligence process the Company performed on the Osprey Plant. Also presents the Company's expected operating and maintenance costs for the Osprey Plant and explains why the major maintenance work and associated costs are necessary for the Osprey Plant.	2
Matthew E. Palasek	Describes the term sheet and the Asset Purchase and Sale Agreement between DEF and the Osprey Energy Center, LLC as the assignee of Calpine for DEF's acquisition of the Calpine Osprey Plant. Also generally explains the terms of the APA and the beneficial terms and conditions that the Company obtained for the benefit of DEF's customers.	3
Benjamin M.H. Borsch	Provides an overview of DEF's acquisition of the Osprey Plant, and the Company's Suwannee Simple Cycle Project. Explains that DEF still has a need for additional	1, 2, 3, 4, 5

	generation capacity prior to 2018 and that the Osprey Plant acquisition and alternatively the Suwannee Simple Cycle Project meet DEF's remaining need prior to 2018 in the most cost-effective manner for DEF's customers. Also sets forth the reasons why the Osprey Plant, and alternatively the Suwannee Simple Cycle Project, is the most cost effective generation resource to meet that need.	

2. DIRECT TESTIMONY EXHIBITS.

Exhibit Number	Witness	Description
Exhibit No. __(MEL-1)	Mark E. Landseidel	A map showing the location of the Suwannee power plant site in Suwannee County, Florida.
Exhibit No. __(MEL-2)	Mark E. Landseidel	The preliminary layout of the Suwannee Simple Cycle project at the Suwannee power plant site.
Exhibit No. __(MEL-3)	Mark E. Landseidel	An itemization of the major cost items for the Suwannee Simple Cycle project.
Exhibit No. __(MEL-4)	Mark E. Landseidel	CONFIDENTIAL – The projected schedule for completion of the Suwannee Simple Cycle project.
Exhibit No. __(ELS-1)	Edward L. Scott	CONFIDENTIAL –A copy of Mr. Scott's May 27, 2014 Direct Testimony and Exhibits filed in Docket No. 140111-EI, In re: Petition for Determination of Cost Effective Generation Alternative to Meet Need Prior to 2018 for Duke Energy Florida, Inc.

Exhibit No.__(KED-1)	Kevin E. Delehanty	CONFIDENTIAL – A copy of Mr. Delehanty's May 27, 2014 Direct Testimony filed in Docket No. 140111-EI in re: Petition for Determination of Cost Effective Generation Alternative to Meet Need Prior to 2018 for Duke Energy Florida, Inc., along with Exhibit Nos. ___ (KD-1) through (KD-4).
Exhibit No.__(KED-2)	Kevin E. Delehanty	CONFIDENTIAL - A chart of the Company's base, high, and low natural gas price forecast.
Exhibit No.__(KED-3)	Kevin E. Delehanty	CONFIDENTIAL - A chart of the Company's base natural gas price forecast and other industry natural gas price forecasts.
Exhibit No. ___ (KGE-1)	Kris G. Edmondson	A map showing the location of the Osprey Energy Center in Auburndale, Polk County, FL.
Exhibit No. ___ (KGE-2)	Kris G. Edmondson	CONFIDENTIAL – The Technical Due Diligence Evaluation report for the Osprey Energy Center prepared by Burns & McDonnell Engineering Company, Inc.
Exhibit No. ___ (KGE-3)	Kris G. Edmondson	CONFIDENTIAL – The Pro Forma Maintenance Cost Summary Projections for the Osprey Plant.
Exhibit No. ___ (MEP-1)	Matthew E. Palasek	CONFIDENTIAL - The August 25, 2014 term sheet between DEF and Calpine for DEF's acquisition of the Osprey Plant.
Exhibit No. ___ (MEP-2), as amended	Matthew E. Palasek	CONFIDENTIAL – The APA between DEF and

		Calpine for DEF's acquisition of the Osprey Plant, including Amendments 1, 2, 3, and 4.
Exhibit No.__(BMHB-1)	Benjamin M.H. Borsch	CONFIDENTIAL – A composite exhibit of (i) Mr. Borsch's direct testimony and exhibits and (ii) the direct testimony and exhibits of DEF's expert Julie Solomon, who performed the FERC Competitive Analysis Screen qualitative analysis for DEF's evaluation of generation alternatives to meet its need prior to 2018, filed with the Commission in Docket No. 140111-EI on May 27, 2014.
Exhibit No.__(BMHB-2)	Benjamin M.H. Borsch	CONFIDENTIAL –A composite exhibit of (i) Mr. Borsch's rebuttal testimony and exhibits and (ii) the rebuttal testimony and exhibits of DEF's expert Julie Solomon, who performed the FERC Competitive Analysis Screen qualitative analysis for DEF's evaluation of generation alternatives to meet its need prior to 2018, filed with the Commission in Docket No. 140111-EI on August 5, 2014.
Exhibit No.__(BMHB-3)	Benjamin M.H. Borsch	The Company's final detailed economic analysis results that demonstrate the Osprey Plant acquisition is a more cost-effective generation alternative than the Suwannee Simple Cycle Project, if the requisite regulatory approvals for the

		Osprey Plant acquisition are obtained in accordance with the terms of the Asset Purchase and Sale Agreement between DEF and Calpine.
Exhibit No.__(BMHB-4)	Benjamin M.H. Borsch	The Company's forecast of summer peak demands and reserves with and without additional generation capacity in the summers of 2016 and 2017.

3. REBUTTAL TESTIMONY EXHIBITS.

No rebuttal testimony exhibits are identified as no rebuttal testimony was filed.

In addition, DEF reserves the right to utilize any exhibits introduced by another party and to introduce additional exhibits necessary for rebuttal or cross examination at the final hearing of this matter.

C. DEF'S STATEMENT OF BASIC POSITION:

The Company's current and projected customer and peak demand growth, and its existing and planned plant retirements and generation plant capacity reductions, demonstrate a need for additional generation capacity in the summer of 2017. Accordingly, on January 30, 2015, pursuant to the provisions of Chapter 366, Florida Statutes, and Rules 25-22.080 and 28-106.301, Florida Administrative Code ("F.A.C."), and in accordance with the 2013 Revised and Restated Stipulation and Settlement Agreement ("2013 Settlement Agreement"), DEF petitioned the Florida Public Service Commission ("PSC" or the "Commission") for a determination that the Calpine Construction Finance Company, L.P. ("Calpine") Osprey Plant acquisition[2] and, alternatively, if DEF cannot purchase the Osprey Plant, the construction of the Suwannee Simple Cycle Project is the most cost effective generation to meet DEF's remaining need for additional generation capacity prior to 2018. DEF needs either the Osprey Plant or, if DEF cannot purchase the Osprey Plant, the Suwannee Simple Cycle Project to meet its remaining need for additional generation prior to 2018.

DEF signed an Asset Purchase and Sale Agreement ("APA") with Calpine in December 2014 to acquire the Osprey Plant. That acquisition, however, is contingent on various required regulatory approvals, including approval by the Federal Energy Regulatory Commission ("FERC"), this Commission, and the Department of Justice ("DOJ"). DEF

[2] DEF executed an Asset Purchase and Sale Agreement with Osprey Energy Center, LLC as the assignee of Calpine Construction Finance Company, L.P. for the Osprey Plant (Osprey Energy Center).

mitigated this regulatory risk in the APA by preserving for DEF's customers the benefits of the Suwannee Simple Cycle Project. If the requisite regulatory approvals are not timely obtained, DEF cannot purchase the Osprey Plant and DEF will complete the Suwannee Simple Cycle Project to meet DEF's remaining generation need prior to 2018. If this occurs, DEF must commence work on that Suwannee Project in time to complete the project to meet DEF's need for additional generation capacity in the summer of 2017.

DEF has determined, based upon the terms and conditions of the APA, that the Osprey Plant acquisition is the most cost effective generation alternative to meet DEF's need for additional generation prior to 2018, if the Osprey Plant acquisition is approved by the requisite regulatory authorities in accordance with the APA. The Osprey Plant will provide DEF's customers with beneficial combined-cycle generation fuel efficiency and emissions costs at a favorable acquisition price even with the necessary capital maintenance, operations & maintenance, and transmission interconnection investment in the Plant to incorporate it into DEF's system. On a Cumulative Present Value Revenue Requirement ("CPVRR") basis, the Osprey Plant acquisition is the most cost effective alternative for DEF's customers and the Suwannee Simple Cycle Project is the next most cost effective alternative for DEF's customers and the Commission should approve DEF's petition.

D. DEF'S STATEMENT OF ISSUES AND POSITIONS:

The issues listed below were provided for in Order No. PSC-15-0127-PCO-EI, issued March 19, 2015, in accordance with Section III of the OEP:

Issue 1: Does DEF have a need for additional generation capacity prior to 2018?

DEF Position:

Yes. DEF still has a need for near-term additional generation capacity consistent with what DEF demonstrated in Docket No. 140111-EI as explained in DEF's direct testimony and exhibits filed in this docket. The term sheet for DEF's acquisition of the Osprey Plant was executed the first day of the hearing in Docket No. 140111-EI based on the same evidence supporting the need for additional generation capacity in that Docket. Between the date of that term sheet in late August 2014 and the execution of the APA, DEF conducted due diligence evaluations and analyses of the Osprey Plant to ensure that the Osprey Plant acquisition was feasible and practicable. Further, as DEF conducted its due diligence reviews and negotiated the APA with Calpine, DEF continued to evaluate the cost effectiveness of the Osprey Plant acquisition based on meeting the remaining need for additional generation capacity prior to 2018 that DEF demonstrated in Docket No. 140111-EI. That need remained through DEF's decision to sign the APA and purchase the Osprey Plant to meet that need.

DEF identified additional generation capacity needs prior to 2018 during the Company's integrated resource planning ("IRP") process. In its IRP process DEF evaluated the relationship of demand and supply against the Company's reliability criteria and included cost-effective demand side management programs before DEF determined additional

generation capacity was needed prior to 2018. This analysis was first reflected in the Company's 2013 Ten Year Site Plan ("TYSP") and confirmed in its 2014 TYSP. DEF needs additional generation capacity resources on its system prior to 2018 to meet its 20 percent Reserve Margin commitment and to serve DEF's future electrical power needs in a reliable and cost-effective manner for its customers.

One of the factors in the Company's need for additional generation is that DEF is experiencing load growth as the Florida economy recovers from the last recession. DEF expects both more customers and growth in energy demand in the near term.

Another driver in DEF's need for additional generation is the retirement of or reduction in generation capacity on DEF's system including the retirement of its Crystal River Unit 3 nuclear power plant, which accounted for approximately 790 MW of summer generation capacity on DEF's system, and planned retirements of some of DEF's oldest and least efficient plants. Additionally, the Company's plan for compliance with the United States Environmental Protection Agency ("EPA") Mercury and Air Toxics Standards Rule ("MATS") at Crystal River Unit 1 and Crystal River Unit 2 will result in a reduction in their capacity of approximately 130 MW beginning in the spring of 2016.

DEF still needs the Osprey Plant or, alternatively, if DEF cannot purchase the Osprey Plant, the Suwannee Simple Cycle Project by the summer of 2017 to meet its 20 percent Reserve Margin Commitment. The Company's remaining need for additional generation capacity is now approximately 180 MW in the summer of 2017, growing to over 300 MW in the summer of 2018. With the Osprey Plant acquisition the Company's Reserve Margin will be 20.6 percent in the summer of 2017. Alternatively, if DEF builds the Suwannee Simple Cycle Project, the Company's Reserve Margin will be 20.7 percent in the summer of 2017. Without one of these generation capacity additions, DEF's Reserve Margin will decrease to 18 percent in the summer of 2017. Accordingly, DEF needs this additional generation capacity, whether it is the Osprey Plant or the Suwannee Simple Cycle Project, in the summer of 2017 to meet its obligation to provide reliable electric service to its customers. (Borsch).

Issue 2: Is the acquisition of Calpine's Osprey Plant the most cost-effective way to meet DEF's generation need prior to 2018?

DEF Position:

Yes, the acquisition of the Osprey Plant is the most cost effective way to meet DEF's generation need prior to 2018. Before selecting the Osprey Plant, DEF evaluated several generation options to meet its near-term reliability need prior to 2018. Generation alternatives that passed DEF's cost-effectiveness screen based on cost, fuel sources and availability, technological maturity, and resource feasibility were included in DEF's economic evaluation and were evaluated and ranked based on a CPVRR comparison of the generation resource options that satisfied DEF's reliability requirements. Based on the CPVRR analysis, the Company initially chose the Suwannee Simple Cycle Project and the

Hines Chillers Power Uprate Project as its base generation plan to meet the Company's reliability needs prior to 2018.

DEF next evaluated the potential future supply of firm capacity from purchased power contracts and potential generation facility acquisitions, including the Osprey Plant, to determine if they were more cost effective than the Company's Suwannee Simple Cycle Project and Hines Chillers Power Uprate Project to meet its reliability need prior to 2018. DEF screened the proposal's fixed and variable payments or costs and performed economic optimization screening analyses in a staged, detailed economic evaluation. The economic evaluation included a quantification of cost and other qualitative risks with the proposals that were evaluated in cost sensitivity analyses, including gas transportation, transmission, and FERC approval of the acquisitions. These sensitivity analyses provided DEF with a cost effectiveness range for all proposals. As a result of these quantitative and qualitative analyses, DEF initially selected the Suwannee Simple Cycle Project and the Hines Chillers Power Uprate Project as the most cost effective generation resource options to meet DEF's customer reliability needs prior to 2018.

Calpine, however, submitted a new and different proposal that "closed the gap" between the cost effectiveness of the Osprey Plant acquisition and the Suwannee Simple Cycle Project. At that point, DEF and Calpine reached an agreement in principle for DEF to acquire the Calpine Osprey Plant subject to DEF's due diligence reviews of the Plant and the agreement of the parties to an asset purchase agreement for DEF to purchase the Plant.

DEF evaluated the technical feasibility and viability of the Osprey Plant acquisition through due diligence reviews involving the quantitative and qualitative analysis of factors such as the physical condition and maintenance of the Plant, Plant operating permits, capital and O&M requirements to incorporate the Plant into the DEF system, site environmental impacts and environmental permit compliance, permitted water supplies, insurance, indemnity obligations, and guarantees. Based on the results of DEF's due diligence reviews, DEF determined that there were no material impediments to DEF's purchase of the Osprey Plant as a long-term generation resource on DEF's system.

DEF has determined, based upon the terms and conditions of the APA, that the Osprey Plant acquisition is the most cost effective generation alternative to meet DEF's need for additional generation prior to 2018, if the Osprey Plant acquisition is approved by the requisite regulatory authorities in accordance with the APA. The Osprey Plant will provide DEF's customers with beneficial combined-cycle generation fuel efficiency and emissions costs at a favorable acquisition price. On a CPVRR basis, the Osprey Plant acquisition is approximately $61 million more cost effective for DEF's customers than the Suwannee Simple Cycle Project and is the most effective way to meet DEF's remaining generation need prior to 2018. (Borsch, Scott, Delehanty, Edmondson)

Issue 3: **Does the Asset Purchase and Sale Agreement for the Osprey Plant contain adequate provisions to protect DEF's customers?**

DEF Position:

Yes, the APA contains provisions to protect DEF customers, as explained in detail in the testimony of Mr. Palasek and Mr. Borsch. First, DEF negotiated reasonable terms to protect the condition of the Osprey Plant between the APA execution and the closing. Because the closing will not occur until early 2017, DEF and Calpine also negotiated for continued due diligence to ensure that the Osprey Plant remains in a condition that is similar to its current condition, normal wear and tear excepted. Second, a condition precedent to the closing of the Osprey Plant acquisition includes obtaining the requisite governmental or regulatory approvals for the acquisition. In addition, there are provisions that guarantee that Calpine will meet its financial obligations, and, there are protections to ensure that DEF and its customers are held harmless if FERC does not approve the acquisition in the time necessary for DEF to timely re-start the Suwannee project. (Borsch, Palasek)

Issue 4: **If the Osprey Plant cannot be acquired under the terms and conditions of the Asset Purchase and Sale Agreement, is construction of the DEF Suwannee Generation Project the next most cost-effective way to meet DEF's generation need prior to 2018?**

DEF Position:

Yes it is. Before Calpine's proposal for the acquisition of the Osprey Plant "closed the gap" between the projects and made the Osprey Plant acquisition the most cost-effective generation option, DEF had conducted an extensive economic and qualitative analysis and initially selected the Suwannee Simple Cycle Project as the most cost effective option to meet DEF's need prior to 2018. There are customer benefits associated with the location of the Suwannee Simple Cycle Project at an existing Company power plant site that contributed to that conclusion. First, there are limited transmission system network upgrades and costs for the Suwannee Simple Cycle Project associated with the transmission interconnection of the combustion turbines at the existing Suwannee site. These transmission costs and benefits are explained in the direct testimony of Mr. Scott in this proceeding. Second, the location of the Suwannee Simple Cycle Project at an existing brownfield, power plant site means there are limited to no additional environmental impacts associated with this additional generation capacity. Thus, this Project would provide DEF the ability to substantially increase its summer generation capacity to meet customer energy demand while maintaining its compliance with current and future environmental regulations.

These benefits make the Suwannee Simple Cycle Project more economically beneficial to customers than similar generation capacity installed at a greenfield site. For these reasons, DEF's IRP process demonstrated that the economics favored the Suwannee Simple Cycle Project over other available options to meet its need prior to 2018. The results of this process and the Company's evaluation led the Company to conclude, based on price and non-price attributes, that if it is unable to purchase the Osprey Plant, the Suwannee

Simple Cycle Project is the next most cost-effective self-generation alternative to meet DEF's need prior to 2018. (Borsch, Landseidel, Scott)

Issue 5: Given the resolution of the foregoing issues, how and when may DEF request recovery of the final costs for the Osprey Plant acquisition or the Suwannee Simple Cycle Project?

DEF Position:

In accordance with Section 16.A. of the 2013 Settlement Agreement, if DEF acquires the Osprey Plant it will petition to recover the costs of that acquisition through a base rate increase at the time of the acquisition. The closing for the Osprey Plant acquisition is expected to occur in January 2017. Alternatively, if DEF cannot acquire the Osprey Plant, and DEF moves forward to build the Suwannee Simple Cycle Project, DEF will petition to recover the costs to build that project through a base rate increase when the unit is placed in service in 2017. (Borsch)

E. STIPULATED ISSUES:

DEF and FIPUG have stipulated as follows:

Duke Energy Florida, Inc. provides electrical service to FIPUG members; this proceeding affects the substantial interests of FIPUG members who receive electrical service from Duke Energy Florida, Inc.; FIPUG has standing in this matter for trial and appellate purposes.

F. PENDING MOTIONS OR OTHER MATTERS:

None at this time.

G. DEF'S REQUESTS FOR CONFIDENTIAL CLASSIFICATION:

Document No.	Request	Date Filed
01088-15	First Request for Confidential Classification regarding portions of Testimony Exhibits of B. Borsch, E. Scott, M. Palasek, K. Edmondson, and K. Delehanty	2/20/15
01828-15	Second Request for Confidential Classification regarding the Fourth Amendment to the Asset Purchase Agreement between Duke Energy Florida, Inc. and Calpine Construction Finance Company, L.P.	4/2/15
01953-15	Third Request for Confidential Classification regarding DEF responses to Staff First Interrogatories Nos. 6, 7, 12, 16 and 26b and First Request for Production of Documents Nos. 1, 22 and 11	4/8/15

02221-15	Fourth Request for Confidential Classification regarding DEF Supplemental Response Staff First Request for Production No. 2	4/21/15
Pending	Fifth Request for Confidential Classification regarding DEF responses Staff Second Request for Production Nos. 14 – 18	

H. REQUIREMENTS OF PREHEARING ORDER THAT CANNOT BE MET:

There are no requirements of the prehearing order that cannot be met at this time.

I. OBJECTIONS TO WITNESSES' QUALIFICATIONS:

None.

Respectfully submitted on the 6th day of May, 2015,

/s/ *Blaise N. Gamba*

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished to counsel and parties of record as indicated below via electronic mail this 6th day of May, 2015.

/s/ Blaise N. Gamba
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