#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for approval of modifications to the approved premier power tariff and the government underground tariff and for approval of new government cost recovery contract, by Duke Energy Florida, LLC

Filed: June 7, 2016

Docket No. 160126-EI

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# DUKE ENERGY FLORIDA, LLC'S RESPONSE TO STAFF'S FIRST DATA REQUEST

1. Please refer to Fifth Revised Sheet No. 4.124, Section 12.06(2) related to the Annual Recovery Amount formula: please confirm that the formula been reformatted to fit on a single line and will produce the same arithmetic results as the currently approved formula. If not, please explain. Also, please verify that the formula is the same on revised tariff Sheet Nos. 4.124 and 7.060.

ANSWER: Yes. The formula as revised in this proposed tariff sheet does produce the same mathematical results as the formula was written in the previous version. The previous version format was difficult to understand where the mathematical operands were. The formula on tariff sheet 4.124 and 7.060 are the same formula.

2. Please state how many, if any, local governments have contracted with Duke to date for underground cost recovery. If any, please explain how those local governments took underground service without the Cost Recovery Contract?

ANSWER: None.

3. Please discuss if Duke anticipates any local governments to convert from overhead to underground in the near future.

ANSWER: DEF has been involved in discussions with some local governments regarding overhead to underground conversion projects. While none of the local governments have specifically requested to execute an underground cost recovery contract, DEF has provided initial information regarding the process.

4. Please refer to Rate Schedule PPS-1: General Service Premier Power Service Rider – what is the justification for allowing the availability of the premier power service rider to curtailable/interruptible classes such as CS-1, CS-2, CS-3, CST-1, CST-2, SCT-3, IS-1, IS-2, IST-1 and IST-2?

#### **ANSWER:**

The purpose of the Premier Power Service Rider is to provide a back-up supply of electric service in the event normal service is interrupted. The Premier Power back-up generators are owned, operated and installed by the Company and are connected on the Company's side of the meter. The justification for making the General Service Premier Power Service Rider available to customers taking service on curtailable and interruptible (CS/IS) rate schedules is that there are customers on CS/IS rate schedules who also have a need for back-up generation. For example, there are certain CS/IS customers who have sensitive manufacturing or operational processes and need backup generation to support power quality and mitigate the impact of even momentary interruptions. As customers' equipment has become more dependent on a high level of power quality we see more requests for a level of service that Premier Power can deliver. Expanding the Premier Power tariff will allow the company to assist these customers with their ever increasing need for service reliability. These customers, however, are also willing to allow the Company to dispatch the backup generators as part of a demand response program. The Premier Power Service Rider isn't currently available to these customers which means their only option is to install backup generation on their side (customer's side) of the meter. However, there are certain situations where, because of factors like the configuration of the customer's facilities and service requirements, it may be less complicated and more advantageous from an operational perspective to design and install a back-up system on the Company's side of the meter through the Premier Power program.

5. Please refer to Rate Schedule PPS-1, Revised Sheet No. 6.370 and 6.371 which refers to General Service – Premier Power Service Rider while in the contents of the tariff pages, the term General Service has been replaced with the term non-residential. Should the title of the rate schedule also be revised to state "non-residential"?.

ANSWER: No. The references in this tariff to "non-residential" are all referring to an otherwise applicable tariff, not to this PPS tariff. The otherwise applicable tariffs are both non-residential and general service tariffs.

## RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of June, 2016.

/s/ Dianne M. Triplett

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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this  $7^{\rm th}$  day of June, 2016.

/s/ Dianne M. Triplett

Attorney

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