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Public Service Commission

September 20, 2017

Dianne M. Triplett, Esq.
Duke Energy Florida, LLC
299 First Avenue North
St. Petersburg, Florida 33701
Dianne.Triplett@duke-energy.com

STAFF'S SIXTH DATA REQUEST (Nos. 17-53)

via email

Re: Docket No. 20170183-EI - Application for limited proceeding to approve 2017 second revised and restated settlement agreement, including certain rate adjustments, by Duke Energy Florida, LLC.

Dear Ms. Triplett:

By this letter, Commission staff (staff) requests that Duke Energy Florida, LLC (DEF or Company) provide responses to the following data requests.

17. Refer to Paragraph 17a.i. Regarding EVSE installations located behind the customer meter, please identify, by customer class and technology type as available, the target customers, anticipated types of expenses incurred, approved tariff pages containing all service and rates provisions inclusive of EVSE, methods of recovering each type of expense incurred not otherwise contained in currently-approved rates (if any), accounting provisions (with sample entries by FERC account), the services DEF expects to contract out in order to provide EVSE service, and the associated types of vendors to perform each such service.

18. Refer to Paragraph 17.c. Regarding EVSE installations in which electricity is sold directly to EV drivers, identify the target customers, anticipated types of expenses incurred, approved tariff pages containing all service and rates provisions inclusive of EVSE (including administrative and processing fees), methods of recovering each expense incurred not otherwise contained in currently-approved rates (if any), billing and collection arrangements, accounting provisions (with sample entries by FERC account), the services DEF expects to contract out in order to provide EVSE service, and the associated types of vendors to perform each such service.

19. Refer to Paragraph 17.g.i. As stated in the proposed Settlement, “Revenues generated through the EVSE shall offset the amount of the costs to be deferred to the Regulatory Asset.”
 - a. Please explain specifically which revenues generated from the EVSE Pilot Program (funds collected through approved rates) will be used to offset the amount of costs to be deferred to the Regulatory Asset, as opposed to recovering the other costs of production, distribution, transmission, etc. of electricity service.
 - b. Please explain whether such revenues are expected to meaningfully offset the amount of costs to be deferred to the regulatory asset.
20. Refer to Exhibit 7 of the proposed Settlement. Please indicate the expected proportion of “minimum EVSE” to be deployed for each segment in each of the two possible installation categories, including: 1. Behind the meter installations and 2. Direct sales to EV drivers installations.
21. Refer to Paragraph 17a.ii. What is meant by the term “reasonable” as relates to operating and maintenance expense?
22. Refer to Paragraph 17a.ii. This section appears to state that the Pilot Program expenditures for any segment for which DEF cannot find willing host sites for the number of installations identified in Exhibit 7 can be shifted to new segments proposed by DEF, approved in advance by the Commission or segments identified in Paragraph 17.a.iii as “low income communities.” Please further elaborate on the segments known as “low income communities” to more definitively explain the location and types of installations, similar to the more precise locations included in the Exhibit 7 EVSE Chart and the EVSE technology to be deployed, and how such segments are distinct from those appearing in Exhibit 7.
23. What is the expected schedule for the EVSE Pilot Program Request for Proposals, market education and outreach, initiation and completion of the EVSE installations identified in Exhibit 7 of the proposed Settlement, and the filing of various reports and all other DEF filings with the Commission associated with the EVSE Pilot Program referenced in Paragraph 17?
24. Refer to Paragraph 17e. At this time, does DEF have a general plan for market education and outreach to promote the EVSE Pilot Program? If so, please explain in as much detail as may be available.
25. Refer to Paragraph 17f.iv. Please explain whether the cost of DEF’s efforts to coordinate with transit agencies to expand awareness of Zero Emission Buses is funded by the

consumer education funding discussed in Par. 17e., and if not, how it will otherwise be funded.

26. How will DEF's implementation of the EVSE Pilot Program be reflected in DEF's Annual Depreciation Status Reports as referenced in Rule 25-6.0436(6), F.A.C.?
27. Refer to Paragraph 17.f.i. Does DEF intend to include in the annual comprehensive data related to the EVSE Pilot Program reported annually the financial data associated with the program, such as revenues collected, expenses incurred, achieved return, and net income?

Refer to Paragraph 5a.(1) for questions 28-30.

28. Does DEF have a current estimate of the total in-service capital cost associated with the dry cask storage (DCS) facility? If so, please provide.
29. To date, has DEF received any awards/compensation from the Department of Energy regarding onsite spent nuclear fuel storage? If so, please provide a dated listing of all award/compensation amounts.
30. Does DEF have an estimated timeframe of when it will make its initial filing for recovery of DCS facility costs?

Refer to Paragraph 7 for questions 31-36.

31. Please specify the current balance of the Crystal River Unit 3 (CR3) Nuclear Decommissioning Trust Fund (NDT).
32. Please discuss how/what factors would lead DEF to determine "that additional funds are necessary in order to fund the CR3 Nuclear Decommissioning Trust" in the near-term or prior to the filing of DEF's next decommissioning study.
33. How does DEF contemplate the Commission will ascertain the amount of any possible base rate surcharge as discussed in Paragraph 7 of the proposed Settlement? Please specify the type of proceeding, nature of Company filings, requested surcharge formulation support etc.
34. To date, has DEF withdrawn any funds from the CR3 NDT? If so, please provide the dated withdrawal amount(s) and discuss the associated actions/expenditures.

35. Are the cost projections found in DEF's 2014 Decommissioning Cost Study of CR3 the most current estimates known to the Company? If not, please specify the most current total projected decommissioning cost figure available in both nominal and current dollars.
36. Are there any current interests/parties (i.e. financial contributors to the CR3 NDT) other than DEF who bear cost responsibility for the cost of decommissioning CR3?
 - a. If the response to Data Request 36 is negative, how and by what means were all previous co-owners of CR3 discharged of their responsibilities for funding decommissioning activities?
 - b. Does Paragraph 7 of the proposed Settlement affect in any way current (if any) or prior co-owners of CR3?
 - c. If the response to Data Request 36 is null/no effect, is it possible that DEF's customers may directly fund (exclusive of any fund earnings) the decommissioning cost of CR3 in excess of 91.7806 percent?¹

Refer to Paragraph 8 for questions 37 and 38:

37. The agreement reads "DEF shall be permitted to continue the annual depreciation expense and depreciation rate associated with CRS based on the last Commission-approved depreciation study which assumed a 2020 CRS retirement date" Please specify the month (and year if different than 2020) depreciation expense would cease under this compliance measure/early retirement scenario.
38. Is it correct that the terms of Paragraph 8 of the proposed Settlement imply a 1-year amortization of the remaining Crystal River South net book value and such amortization will occur in 2021 (subject to minor deviation due to billing cycles) unless a different period is agreed on by the signatories to the proposed Settlement?

Refer to Paragraph 24 for questions 39-44.

39. What is the currently-approved depreciation rate (or rates) and authorizing Commission Order No. associated with both the meter reading (MMR) assets and the commercial Silver Springs Network (SSN) meter assets?
40. Please specify the current net book value of the Company's MMR and SSN assets.
41. Regarding the new advanced metering infrastructure (AMI) assets, what is the proposed rate of net salvage associated with these investments?

¹ DEF's ownership share of CR3 per the Company's most recent decommissioning study, filed in Docket No. 140057-EI (Section 1, Page 4 of 8).

42. Does DEF have a total in-service cost estimate associated with its planned AMI campaign? If so, please provide.
43. If Paragraph 24 of the Petition is approved, what is the estimated dollar impact on the 2018 projections provided in Docket No. 20170002-EG, Schedule C-2, page 2? Please explain.
44. If Paragraph 24 of the Petition is approved, what impact will this have on the 2018 factors requested by the Company in Docket No. 20170002-EG? Please explain.
45. Refer to Paragraph 25. Please specify the current net book value of the UF Cogeneration Plant.

Refer to Paragraph 32 for requests 44 and 45.

46. Please specify the current balance of the cost of removal regulatory asset.
47. For illustrative purposes, please provide a hypothetical example of how the Company intends to recover the cost of removal regulatory asset (i.e. will the recovery be incorporated into (or outside of) plant remaining life depreciation rates etc.) pursuant to the terms of this paragraph.
48. Referring to the Shared Solar Rider (Rate Schedule SOL-1), please respond to the following questions:
 - a. What costs is the monthly subscription fee of \$7.75 designed to recover?
 - b. Is a residential customer who purchases an individual block of 50 kWh expected to save on the bill (i.e., will the monthly bill credit for one block offset the monthly subscription fee?) If not, please state how many blocks a residential customer needs to purchase to offset the subscription fee based on estimated available energy prices for 2018.
49. Referring to Paragraph 12.b of the proposed Settlement, please state the projected residential 1,000 kwh bill for January 2019, January 2020, and January 2021 based on the base rate increases shown in that paragraph. Please show base rates and recovery clauses separate.
50. Referring to the proposed FixedBill Program (Rate Schedule FB-1), please respond to the following questions:
 - a. The Risk Adder is designed to compensate DEF for “non- weather related impacts.” The Usage adder is used to compensate DEF in the first year for “increased usage not associated with the weather.” Please discuss in more detail

the difference between the two adders applied in the customer's first year on the FixedBill Program.

- b. Provision 3C of the tariff allows DEF to terminate the customer's FixedBill agreement. Please discuss how DEF will monitor a customer's consumption and at what point DEF will notify the customer that they are at risk of being removed from the program.
51. Refer to the proposed Settlement's Rate Schedule FB-1, Page 2 of 3, Definition "Predicted Weather Normalized Monthly kWh Usage." Please explain the calculations used to determine this weather input to this metric (normal weather), including the number of years of heating-degree and cooling degree-days data, any weightings which may be applied to the data (e.g. perhaps recognizing population density by weather station, climate change, etc.), base temperatures, etc..
52. Please provide the most recent documentation filed with the Nuclear Regulatory Commission concerning the status/level of the CR3 NDT (associated with Paragraph 7 of the proposed Settlement).
53. Please provide Exhibit 2 of the proposed Settlement in spreadsheet form, including all formulas embedded in the spreadsheet.

Please file all responses electronically no later than Wednesday, September 27, 2017, through the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6230 if you have any questions.

Sincerely,

/s/ *Kyesha Mapp*

Kyesha Mapp
Senior Attorney

KRM/as

cc: Office of Commission Clerk
 Parties to Docket Nos. 20100437-EI, 20150171-EI, 20170001-EI, 20170002-EG,
 20170009-EI (via email)