

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor.	DOCKET NO. 20170001-EI
	DATED: October 2, 2017

**DUKE ENERGY FLORIDA, LLC'S
PREHEARING STATEMENT**

Duke Energy Florida, LLC (“DEF”) hereby submits its Prehearing Statement with respect to its levelized fuel and capacity cost recovery factors and its Generating Performance Incentive Factor (GPIF) for the period of January 2018 through December 2018:

1. **Known Witnesses** - DEF intends to offer the testimony of:

Witness	Subject Matter	Issues#
Christopher A. Menendez	Fuel Cost Recovery True-Up (2016); Capacity Cost Recovery True-Up (2016); Actual / Estimated and Projection Schedules; Other Matters	1B, 6-11, 18-23B, 27-36
Joseph McCallister	Generic Hedging Issues; 2017 April/August Hedging Information	1A
Matthew J. Jones	GPIF: Reward/Penalty Schedules; GPIF: Targets/Ranges Schedules	16, 17

2. **Known Exhibits** - DEF intends to offer the following exhibits:

Witness	Proffered By	Exhibit #	Description
Christopher Menendez	DEF	(CAM-1T)	Fuel Cost Recovery True-Up (Jan – Dec. 2016)

Christopher Menendez	DEF	(CAM-2T)	Capacity Cost Recovery True-Up (Jan – Dec. 2016) CONFIDENTIAL
Christopher Menendez	DEF	(CAM-3T)	Schedules A1 through A3, A6 and A12 for Dec 2016 CONFIDENTIAL
Christopher Menendez	DEF	(CAM-4T)	2016 Capital Structure and Cost Rates Applied to Capital Projects
Christopher Menendez	DEF	(CAM-2)	Actual/Estimated True-up Schedules for period January – December 2017 CONFIDENTIAL
Christopher Menendez	DEF	(CAM-3)	Projection Factors for January - December 2018 CONFIDENTIAL
Christopher Menendez	DEF	(CAM-3)	Alternative Fuel and Capacity Cost Recovery Factors for January - December 2018 CONFIDENTIAL
Joseph McCallister	DEF	(JM-1T)	Hedging True-Up August - December 2016- CONFIDENTIAL
Joseph McCallister	DEF	(JM-1P)	Hedging Report (January – July 2017) – CONFIDENTIAL
Matthew Jones	DEF	Revised (MJJ-1T)	GPIF Reward/Penalty Schedules for 2016 (submitted on 8/24/17)
Matthew Jones	DEF	(MJJ-1P)	GPIF Targets/Ranges Schedules for January – December 2018)

DEF reserves the right to identify additional exhibits for the purpose of cross-examination or rebuttal.

3. **Statement of Basic Position** - Not applicable. DEF's positions on specific issues are listed below.
4. **Statement of Facts**

FUEL ISSUES

COMPANY SPECIFIC FUEL ADJUSTMENT ISSUES

Duke Energy Florida, LLC

ISSUE 1A: Should the Commission approve as prudent DEF's actions to mitigate the volatility of natural gas, residual oil, and purchased power prices, as reported in DEF's April 2017 and August 2017 hedging reports?

DEF: Yes. The Commission should approve as prudent DEF's actions to mitigate the volatility of natural gas, residential oil and purchased power prices as reported in DEF's April 2017 and August 2017 hedging reports. (McCallister)

Florida Power & Light, Co.

ISSUE 2A: Should the Commission approve as prudent FPL's actions to mitigate the volatility of natural gas, residual oil, and purchased power prices, as reported in FPL's April 2017 and August 2017 hedging reports?

DEF: No position.

ISSUE 2B: What is the total gain in 2016 under the Incentive Mechanism approved in Order No. PSC-13-0023-S-EI, and how is that gain to be shared between FPL and customers?

DEF: No position.

ISSUE 2C: What is the appropriate amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for Personnel, Software, and Hardware costs for the period January 2016 through December 2016?

DEF: No position.

ISSUE 2D: What is the appropriate amount of Incremental Optimization Costs under the Incentive Mechanism that FPL should be allowed to recover through the fuel clause for variable power plant O&M costs incurred to generate output for wholesale sales in excess of 514,000 megawatt-hours for the period January 2016 through December 2016?

DEF: No position.

ISSUE 2E: What is the appropriate amount of actual/estimated Incremental Optimization Costs under the Incentive Mechanism approved by Order No. PSC-16-0560-AS-EI that FPL may recover through the fuel clause for the period January 2017 through December 2017?

DEF: No position.

ISSUE 2F: What is the appropriate amount of actual/estimated variable power plant O & M expenses under the revised Incentive Mechanism that FPL may recover through the fuel clause for the period January 2017 through December 2017?

DEF: No position.

ISSUE 2G: What is the appropriate amount of projected Incremental Optimization costs under the revised Incentive Mechanism FLP may recover through the fuel clause for the period January 2018 through December 2018?

DEF: No position.

ISSUE 2H: What is the appropriate amount of projected variable power plant O&M expenses under the revised Incentive Mechanism FPL may recover through the fuel clause for the period January 2018 through December 2018?

DEF: No position.

ISSUE 2I: Have all Woodford-related costs been removed from FPL's requested true-up and projected fuel costs?

DEF: No position.

ISSUE 2J: Are the 2017 SOBRA projects proposed by FPL (Horizon, Wildflower, Indian River, and Coral Farms) cost effective?

DEF: No position.

ISSUE 2K: What are the revenue requirements associated with the 2017 SOBRA projects?

DEF: No position.

ISSUE 2L: What is the appropriate base rate percentage increase for the 2017 SOBRA projects to be effective when all 2017 projects are in service, currently projected to be on January 1, 2018?

DEF: No position.

ISSUE 2M: Are the 2018 SOBRA projects proposed by FPL (Hammock, Bearfoot Bay, Blue Cypress and Loggerhead) cost effective?

DEF: No position.

ISSUE 2N: What are the revenue requirements associated with the 2018 SOBRA projects?

DEF: No position.

ISSUE 2O: What is the appropriate base rate percentage increase for the 2018 SOBRA projects to be effective when all 2018 projects are in service, currently projected to be March 1, 2018?

DEF: No position.

ISSUE 2P: Should the Commission approve revised tariffs for FPL reflecting base rate percentage increases for the 2017 and 2018 SOBRA projects determined to be appropriate in this proceeding?

DEF: No position.

ISSUE 2Q: Has FPL properly reflected in the fuel and purchased power cost recovery clause the effects of the Indiantown Cogeneration L.P. (Indiantown) facility transaction approved by the Commission in Docket No. 20160154-EI?

DEF: No position.

ISSUE 2R: How should the effects on the 2018 Fuel and Capacity Clause factors of the St. Johns River Power Park Transaction (SJRPP), approved by the Commission September 25, 2017, be addressed?

DEF: No position.

Florida Public Utilities Company

ISSUE 3A: What amount should be refunded to customers as a result of the Florida Supreme Court's March 16, 2017 decision on the FPL Interconnection Line project?

DEF: No position.

Gulf Power Company

ISSUE 4A: Should the Commission approve as prudent Gulf's actions to mitigate the volatility of natural gas, residual oil, and purchased power prices, as reported in Gulf's April 2017 and August 2017 hedging reports?

DEF: No position.

Tampa Electric Company

ISSUE 5A: Should the Commission approve as prudent TECO's actions to mitigate the volatility of natural gas, residual oil, and purchased power prices, as reported in TECO's April 2017 and August 2017 hedging reports?

DEF: No position.

GENERIC FUEL ADJUSTMENT ISSUES

ISSUE 6: What are the appropriate actual benchmark levels for calendar year 2017 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

DEF: \$3,019,369. (Menendez)

ISSUE 7: What are the appropriate estimated benchmark levels for calendar year 2018 for gains on non-separated wholesale energy sales eligible for a shareholder incentive?

DEF: \$1,771,110. (Menendez)

ISSUE 8: What are the appropriate final fuel adjustment true-up amounts for the period January 2016 through December 2016?

DEF: \$58,893,512 under-recovery. (Menendez)

ISSUE 9: What are the appropriate fuel adjustment actual/estimated true-up amounts for the period January 2017 through December 2017?

DEF: \$136,610,259 under-recovery. (Menendez)

ISSUE 10: What are the appropriate total fuel adjustment true-up amounts to be collected/refunded from January 2018 to December 2018?

DEF: On August 29, 2017, DEF filed the 2017 Second Revised and Restated Stipulation and Settlement Agreement (“2017 Settlement”) between DEF, the Office of Public Counsel, the Florida Industrial Power Users Group, the Florida Retail Federation, White Springs Agriculture Chemicals, Inc. d/b/a PCS Phosphate and the Southern Alliance for Clean Energy. If the Commission approves the 2017 Settlement, the true-up amount to be recovered in 2018 is a \$97,751,887 under-recovery.

If the Commission does not approve the 2017 Settlement, the true-up amount to be recovered in 2018 is a \$195,503,774 under-recovery. (Menendez)

ISSUE 11: What are the appropriate projected total fuel and purchased power cost recovery amounts for the period January 2018 through December 2018?

DEF: \$1,496,427,570. (Menendez)

COMPANY-SPECIFIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES

Duke Energy Florida, LLC

No company-specific issues for Duke Energy Florida, LLC have been identified at this time. If such issues are identified, they shall be numbered 12A, 12B, 12C, and so forth, as appropriate.

Florida Power & Light, Co.

ISSUE 13A: What are the appropriate adjustments to FPL’s 2017 GPIF targets/ranges to reflect the effects of the Indiantown transaction approved by the Commission in Docket No. 20160154-EI?

DEF: No position.

Gulf Power Company

No company-specific issues for Gulf Power Company have been identified at this time. If such issues are identified, they shall be numbered 14A, 14B, 14C, and so forth, as appropriate.

Tampa Electric Company

No company-specific issues for Tampa Electric Company have been identified at this time. If such issues are identified, they shall be numbered 15A, 15B, 15C, and so forth, as appropriate.

GENERIC GENERATING PERFORMANCE INCENTIVE FACTOR ISSUES

ISSUE 16: What is the appropriate generation performance incentive factor (GPIF) reward or penalty for performance achieved during the period January 2016 through December 2016 for each investor-owned electric utility subject to the GPIF?

DEF: \$2,793,216 reward. (Jones)

ISSUE 17: What should the GPIF targets/ranges be for the period January 2018 through December 2018 for each investor-owned electric utility subject to the GPIF?

DEF: The appropriate targets and ranges are shown on Page 4 of Exhibit MJJ-1P filed on August 24, 2017 with the Direct Testimony of Matthew J. Jones. (Jones)

FUEL FACTOR CALCULATION ISSUES

ISSUE 18: What are the appropriate projected net fuel and purchased power cost recovery and Generating Performance Incentive amounts to be included in the recovery factor for the period January 2018 through December 2018?

DEF: If the Commission approves the 2017 Settlement, the appropriate net fuel and purchased power cost recovery and Generating Performance Incentive amounts to be included in the recovery factor for the period January 2018 through December 2018 is \$1,598,120,482.

If the Commission does not approve the 2017 Settlement, the appropriate net fuel and purchased power cost recovery and Generating Performance Incentive amounts to be included in the recovery factor for the period January 2018 through December 2018 is \$1,695,942,751. (Menendez)

ISSUE 19: What is the appropriate revenue tax factor to be applied in calculating each investor-owned electric utility’s levelized fuel factor for the projection period January 2018 through December 2018?

DEF: 1.00072. (Menendez)

ISSUE 20: What are the appropriate levelized fuel cost recovery factors for the period January 2018 through December 2018?

DEF: If the Commission approves the 2017 Settlement, the appropriate levelized fuel factor is 4.127 cents per kWh (adjusted for jurisdictional losses).

If the Commission does not approve the 2017 Settlement, the appropriate levelized fuel factor is 4.380 cents per kWh (adjusted for jurisdictional losses). (Menendez)

ISSUE 21: What are the appropriate fuel recovery line loss multipliers to be used in calculating the fuel cost recovery factors charged to each rate class/delivery voltage level class?

DEF:

<u>Group</u>	<u>Delivery Voltage Level</u>	<u>Line Loss Multiplier</u>
A.	Transmission	0.9800
B.	Distribution Primary	0.9900
C.	Distribution Secondary	1.0000
D.	Lighting Service	1.0000

(Menendez)

ISSUE 22: What are the appropriate fuel cost recovery factors for each rate class/delivery voltage level class adjusted for line losses?

DEF: If the Commission approves the 2017 Settlement, the fuel recovery factors are as follows:

Fuel Cost Factors (cents/kWh)	
	Time of Use

Group	Delivery Voltage Level	First Tier Factor	Second Tier Factors	Levelized Factors	On-Peak	Off-Peak
A	Transmission	--	--	4.049	5.005	3.604
B	Distribution Primary	--	--	4.091	5.056	3.641
C	Distribution Secondary	3.838	4.838	4.132	5.107	3.677
D	Lighting Secondary	--	--	3.945	--	--

If the Commission does not approve the 2017 Settlement, the fuel recovery factors are as follows:

Fuel Cost Factors (cents/kWh)						
					Time of Use	
Group	Delivery Voltage Level	First Tier Factor	Second Tier Factors	Levelized Factors	On-Peak	Off-Peak
A	Transmission	--	--	4.297	5.311	3.824
B	Distribution Primary	--	--	4.341	5.365	3.863
C	Distribution Secondary	4.091	5.091	4.385	5.420	3.903
D	Lighting Secondary	--	--	4.186	--	--

(Menendez)

COMPANY-SPECIFIC CAPACITY COST RECOVERY FACTOR ISSUES

Duke Energy Florida, LLC

ISSUE 23A: Has DEF included in the Capacity Cost Recovery Clause the nuclear cost recovery amount ordered by the Commission in Docket No. 20170009-EI?

DEF: If approved by the Commission, the 2017 Settlement removes all Levy costs from 2018 rates. Therefore, DEF included \$49,648,457 for the Crystal River 3 Uprate project as stipulated by DEF and the intervener parties and approved by the Commission by a bench vote on August 15, 2017.

If the Commission does not approve the 2017 Settlement, DEF included \$49,648,457 for the Crystal River 3 Uprate project as stipulated by DEF and the intervener parties and approved by the Commission by a bench vote on August 15, 2017. The Levy project will be addressed as set forth in DEF's August 29, 2017 Motion in Docket No. 20170009-EI and approved by the Commission in Order No. PSC-2017-0341-PCO-EI on August 30, 2017. (Menendez)

Florida Power & Light Company

ISSUE 24A: Has FPL included in the capacity cost recovery clause the nuclear cost recovery amount ordered by the Commission in Docket No. 20170009?

DEF: No position.

ISSUE 24B: Has FPL properly reflected in the capacity cost recovery clause the effects of the Indiantown transaction approved by the Commission in Docket No. 20160154-EI?

DEF: No position.

ISSUE 24C: What are the appropriate Indiantown non-fuel base revenue requirements to be recovered through the Capacity Clause pursuant to the Commission's approval of the Indiantown transaction in Docket No. 20160154-EI for 2017 and 2018?

DEF: No position.

ISSUE 24D: Is \$5,155, 918 the appropriate refund amount associated with the Port Everglades Energy Center (PEEC) GBRA true-up?

DEF: No position.

Gulf Power Company

No company-specific issues for Gulf Power Company have been identified at this time. If such issues are identified, they shall be numbered 25A, 25B, 25C, and so forth, as appropriate.

Tampa Electric Company

No company-specific issues for Tampa Electric Company have been identified at this time. If such issues are identified, they shall be numbered 26A, 26B, 26C, and so forth, as appropriate.

GENERIC CAPACITY COST RECOVERY FACTOR ISSUES

ISSUE 27: What are the appropriate final capacity cost recovery true-up amounts for the period January 2016 through December 2016?

DEF: \$2,203,058 over-recovery. (Menendez)

ISSUE 28: What are the appropriate capacity cost recovery actual/estimated true-up amounts for the period January 2017 through December 2017?

DEF: \$7,324,397 under-recovery. (Menendez)

ISSUE 29: What are the appropriate total capacity cost recovery true-up amounts to be collected/refunded during the period January 2018 through December 2018?

DEF: \$5,121,339 under-recovery. (Menendez)

ISSUE 30: What are the appropriate projected total capacity cost recovery amounts for the period January 2018 through December 2018?

DEF: \$404,721,485. (Menendez)

ISSUE 31: What are the appropriate projected net purchased power capacity cost recovery amounts to be included in the recovery factor for the period January 2018 through December 2018?

DEF: The appropriate projected net purchased power capacity cost recovery amount, including ISFSI and excluding nuclear cost recovery, is \$419,453,270. The appropriate nuclear cost recovery amount is that which is approved in Issue 23. (Menendez)

ISSUE 32: What are the appropriate jurisdictional separation factors for capacity revenues and costs to be included in the recovery factor for the period January 2018 through December 2018?

DEF: Base – 92.885%, Intermediate – 72.703%, Peaking – 95.924%, consistent with the Revised and Restated Stipulation and Settlement Agreement approved in Order No. PSC-13-0598-FOF-EI, and carried over to the 2017 Settlement. (Menendez)

ISSUE 33: What are the appropriate capacity cost recovery factors for the period January 2018 through December 2018?

DEF: If the Commission approves the 2017 Settlement, the capacity recovery factors for the period January 2018 through December 2018 are as follows:

<u>Rate Class</u>	<u>CCR Factor</u>
Residential	1.433 cents/kWh
General Service Non-Demand	1.117 cents/kWh
@ Primary Voltage	1.106 cents/kWh
@ Transmission Voltage	1.095 cents/kWh
General Service 100% Load Factor	0.782 cents/kWh
General Service Demand	4.06 \$/kW-month
@ Primary Voltage	4.02 \$/kW-month
@ Transmission Voltage	3.98 \$/kW-month
Curtailable	2.66 \$/kW-month
@ Primary Voltage	2.63 \$/kW-month
@ Transmission Voltage	2.61 \$/kW-month
Interruptible	3.09 \$/kW-month
@ Primary Voltage	3.06 \$/kW-month
@ Transmission Voltage	3.03 \$/kW-month
Standby Monthly	0.393 \$/kW-month
@ Primary Voltage	0.389 \$/kW-month
@ Transmission Voltage	0.385 \$/kW-month
Standby Daily	0.187 \$/kW-month
@ Primary Voltage	0.185 \$/kW-month
@ Transmission Voltage	0.183 \$/kW-month
Lighting	0.227 cents/kWh

If the Commission does not approve the 2017 Settlement, the capacity cost recovery factors beginning January 2018 will be the same as those listed above, pending the outcome of the deferred Levy-portion of the 2017 NCRC hearing. (Menendez)

EFFECTIVE DATE

ISSUE 34: What should be the effective date of the fuel adjustment factors and capacity cost recovery factors for billing purposes?

DEF: The new factors should be effective beginning with the first billing cycle for January 2018 through the last billing cycle for December 2018. The first billing cycle may start before January 1, 2018, and the last billing cycle may end after

December 31, 2018, so long as each customer is billed for twelve months regardless of when the factors became effective. (Menendez)

ISSUE 35: Should the Commission approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined to be appropriate in this proceeding?

DEF: Yes. The Commission should approve revised tariffs reflecting the fuel adjustment factors and capacity cost recovery factors determined to be appropriate in this proceeding. The Commission should direct Staff to verify that the revised tariffs are consistent with the Commission decision. (Menendez)

ISSUE 36: Should this docket be closed?

DEF: Yes. (Menendez)

5. **Stipulated Issues** -

ISSUE 1B: What adjustments, if any, are needed to account for replacement power costs associated with the February 2017 outage at the Bartow generating plant?

DEF: None. DEF has not included any replacement power costs from the Bartow outage in 2018 rates. These costs will remain in the over/under account to be considered in Docket No. 20180001-EI for recovery in 2019 rates consistent with the stipulation filed on June 14, 2017 in the instant docket. (Menendez)

6. **Pending Motions** - DEF does not have any pending motions at this time.

7. **Requests for Confidentiality**

DEF has the following pending requests for confidential classification:

- July 27, 2017 –Exhibit No. CAM-2 to the direct testimony of Christopher Menendez (DN 06311-2017).
- August 18, 2017-Information contained in the direct testimony of Joseph McCallister and Exhibit JM-1P (DN 07139-2017).
- August 24, 2017- Information contained in Exhibit No. CAM-3 to the direct testimony of Christopher Menendez.
- September 1, 2016-Information contained in Exhibit No. CAM-3 to the direct testimony of Christopher Menendez.
- October 9, 2017-Hedging Audit Workpapers-2017-048-2-1 (DN TBD).

8. **Objections to Qualifications** - DEF has no objection to the qualifications of any expert witnesses in this proceeding at this time, subject to further discovery in this matter.
9. **Sequestration of Witnesses** - DEF has not identified any witnesses for sequestration at this time.
10. **Requirements of Order** - At this time, DEF is unaware of any requirements of the Order Establishing Procedure and Order revising Order Establishing Procedure of which it will be unable to comply.

RESPECTFULLY SUBMITTED this 2nd day of October, 2017.

s/Matthew R. Bernier

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Duke Energy Florida
CERTIFICATE OF SERVICE
Docket No. 20170001-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via email this 2nd day of October, 2017 to all parties of record as indicated below.

s/Matthew R. Bernier
Attorney

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