

Dianne M. Triplett Deputy General Counsel Duke Energy Florida, LLC

August 29, 2018

VIA ELECTRONIC FILING

Ms. Carlotta Stauffer, Commission Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Re: Duke Energy Florida, LLC's, Petition for approval to terminate qualifying facility power purchase agreement with Ridge Generating Station, L.P.; Docket No. 20180152-EQ

Dear Ms. Stauffer:

On behalf of Duke Energy Florida, LLC ("DEF"), please find enclosed for electronic filing in the above referenced docket, DEF's Response to Staff's Second Data Request.

Thank you for your attention to this matter. Please feel free to call me at (727) 820-4692 should you have any questions concerning this filing.

Sincerely,

/s/ Dianne M. Triplett

Dianne M. Triplett

DMT/cmk Attachment

cc: Parties of record

CERTIFICATE OF SERVICE Docket. No. 20180152-EQ

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the following by electronic mail this 29th day of August, 2018, to all parties of record as indicated below.

s/ Dianne M. Triplett

	Attorney
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Florida Public Service Commission	c/o The Florida Legislature
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Duke Energy Florida, LLC's (DEF) Response to Staff's Second Data Request regarding DEF's Petition for approval to terminate qualifying facility power purchase agreement with Ridge Generating Station, L.P.

Docket No. 20180152-EQ

1. Please provide the capital structure(s) used to support the revenue requirements shown in exhibits BMHB-3 and CAM-1.

<u>RESPONSE</u>:

See attached document Q01-20180152-EQ-DR2, bearing bates number 20180152-DEF-000035.

2. Please refer to the direct testimony of DEF witness Menendez, page 6, lines 1-2, and exhibit CAM-1. Please assume that the Ridge transaction is included in customer rates in 2019. Please provide a revised version of CAM-1 for the customer savings from 2019 through 2023.

RESPONSE:

See attached document Q02-20180152-EQ-DR2, bearing bates numbers 20180152-DEF-000036 through 20180152-DEF-000038.

3. Please refer to the direct testimony of DEF witness Borsch, Page 4, lines 8-9. Please provide supporting documents that show costs under the Ridge PPA are above DEF's current avoided costs.

<u>RESPONSE</u>:

The following outlines a current comparison of the components of the Ridge QF PPA costs to DEF's current QF avoided costs. This comparison supports how Ridge's current QF PPA payments are above DEF's current QF avoided costs.

DEF's current avoided unit is a natural gas-fueled combustion turbine with an in-service date of June 1, 2027 as approved by the Commission in Docket 20180073-EQ. Despite the current avoided unit coming on-line after the Ridge QF PPA would expire, various avoided capacity rates are discussed below for illustrative purposes.

The normal capacity payment rate for the 2027 combustion turbine starts at \$4.84/kW-month in 2027 and escalates at 2.5% annually. Even if the QF opted for the maximum term of the Standard Offer Contract, (35 years consistent with the life of the avoided unit) the normal capacity payment rate would escalate to \$11.50/kW-month. The Ridge PPA

has a capacity payment rate of \$19.75/kW-month that remains flat for the term of the PPA. Given the current avoided unit does not begin service until after the Ridge QF PPA would normally expire, it is clear that the current avoided capacity cost is below the Ridge QF PPA capacity payment rate.

The Ridge QF PPA energy payment rates float with the price of fuel at the contractual 1991 avoided coal-fueled reference plant. The Ridge QF PPA energy payment rate is currently based on the delivered price of coal to DEF's Crystal River units 1 & 2 until those units are retired later this year; then, the energy payment rate is based on the coal price for NYMEX Big Sandy coal plus a transportation charge. A 1991 avoided coal unit variable O&M charge, (per Appendix C, Schedule 3 of the contract) is also added to the energy payment. Therefore, the current energy payment rate of the Ridge QF PPA for on-peak hours is \$61.34/MWh and for off-peak hours the rate is \$49.07/MWh.

DEF's current avoided energy payment rates to renewable QFs are reflected in DEF's approved Tariff sheets, No. 9.456 and No. 9.457. Energy payments prior to the 2027 combustion turbine avoided unit in-service date are calculated in accordance with FPSC Rule 25-17.250 and Rule 25-17.0825, F.A.C. also reflected for 2018 in #4(d) below. Energy payments starting on the avoided unit in-service date, (June 1, 2027) in DEF's approved Standard Offer Contract applies a methodology to satisfy FPSC Rule 25-17.250(6)(b) to determine the extent the avoided unit would have operated. Therefore, the hourly Firm Energy Rate for the current avoided unit is the lesser of: (i) the product of the price of delivered natural gas and the avoided unit heat rate of 10.905 BTU/kWh plus a variable O&M charge of 0.931¢ per kWh; or, (ii) the hourly as available rate. For illustrative purposes only, DEF calculated its Avoided Unit Energy Cost using the forecasted price for natural gas in July 2018 as provided in Question #6 of Staff's First Data Request of \$3.159/MMBTU and the methodology in (i) above. This maximum theoretical energy payment rate would be \$43.76/MWh and this rate is below the current Ridge QF PPA energy payment rate.

As demonstrated by the above explanations, DEF's current avoided capacity and energy costs are below the current Ridge QF PPA costs.

- 4. Please provide the following during the period of 2014 through July 2018.
 - a. The monthly capacity and energy payment amount under the Ridge PPA.
 - b. The monthly capacity and energy payment rate (\$/kW and \$/MWh) under the Ridge PPA.
 - c. The capacity factor achieved by the Ridge facility.
 - d. The monthly avoided as-available energy cost.

RESPONSE:

Please see the attached document bearing bates numbers 20180152-DEF-000039 through 20180152-DEF-000040.

5. Is DEF aware of any future use of the Ridge site after the facility is dismantled?

RESPONSE:

DEF is not aware of any plans to use the Ridge site in the future.

6. Please provide a list of all DEF's current PPA contracts, the avoided units for the PPA, the capacity factor requirement for full capacity payment, and whether the facility has been meeting this capacity factor requirement.

Seller	Facility	Avoided	Capacity	Performance
Name	Name	Unit	Factor Requirement	
Pasco County	Pasco County Resource Recovery	1995 Statewide Coal Unit	70%	This facility has consistently met its capacity factor obligations since January 1995.
Pinellas County	Pinellas County Resource Recovery	1995 Statewide Coal Unit	70%	This facility has consistently met its capacity factor obligations since December 2009.
Waste Management	Ridge Generating Station	1991 Coal Unit	85%	This facility has consistently met its capacity factor obligations since March 2018 and generally prior to 2013 over the last 10 years. Prior to March 2018, performance issues reduced the capacity payments accordingly.
Northern Star Generation	Orange Cogen	1991 Coal Unit	90%	This facility has consistently met its capacity factor obligations since December 1998.
Northern Star Generation	Orlando Cogen	1991 Coal Unit	93%	Over the last 10 years this facility has had issues in May 2008, March 2011, May 2014 and April 2017 that negatively affected its capacity payment. Each of these incidents reduced the capacity payments for about a year.
Northern Star Generation	Mulberry	1991 Coal Unit	90%	Over the last 10 years this facility had issues in February 2016 that negatively affected its capacity payment for about a year. There was also a minor incident that affected the capacity payment for May 2015.

<u>RESPONSE</u>:

Duke Energy Florida Docket 20180152 DEF's Response to Staff's 2nd DR Q1 Page 1 of 1

Duke Energy Florida, LLC Capital Structure and Cost Rates Applied to Capital Projects Estimated for the Period of : January 2019 through December 2019

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Line		Adjust	ted Retail \$000's	Ratio	Cost Rate	Weighted Cost Rate	Pretax Weighted Cost Rate
	1 Common Equity	\$	4,374,787	40.92%	10.50%	4.30%	5.75%
	2 Long Term Debt	\$	4,497,052	42.06%	4.90%	2.06%	2.06%
	3 Short Term Debt	\$	(193,058)	-1.81%	0.88%	-0.02%	-0.02%
	4 Customer Deposits - Active		179,649	1.68%	2.35%	0.04%	0.04%
	5 Customer Deposits - Inactive		1,597	0.01%	0.00%	0.00%	0.00%
	6 ITC		5,239	0.05%	7.85%	0.00%	0.00%
	8 ADIT		1,826,909	17.09%	0.00%	0.00%	0.00%
		\$	10,692,175	100.00%		6.38%	7.84%
					Total Debt	2.09%	2.09%

0% 5.	.75%
	0% 5.

Docket 20180152 DEF's Response to Staff's 2nd DR Q2 Page 1 of 3

Ridge Termination - Estimated Residential Price Impact - Upper Band (260 GWh)¹ \$ in millions

		2019	2020	2021	2022	2023
А	System Fuel Savings	(7.8)	(7.9)	(8.2)	(8.8)	(9.4)
В	Jurisdictional Separation Factor ²	99.5%	99.5%	99.5%	99.5%	99.5%
C = A x B	Net Retail Customer Fuel (Savings) / Cost	(7.7)	(7.8)	(8.2)	(8.8)	(9.3)
D	Retail MWh Sales	39,174,756	39,903,431	40,405,160	40,844,559	41,237,962
E	Estimated Residential Fuel Clause 1,000 kWh Impact ³	(0.18)	(0.18)	(0.19)	(0.20)	(0.21)
F	System Capacity Savings	(9.6)	(9.6)	(9.6)	(9.6)	(9.6)
G	Ridge Regulatory Asset Revenue Requirement	9.3	8.8	8.3	7.7	7.2
H = F + G	Net System Capacity (Savings) / Cost	(0.3)	(0.8)	(1.4)	(1.9)	(2.4)
I	Jurisdictional Separation Factor ⁴	92.885%	92.885%	92.885%	92.885%	92.885%
J = H x I	Net Retail Customer Capacity (Savings) / Cost	(0.3)	(0.8)	(1.3)	(1.8)	(2.3)
D	Retail MWh Sales	39,174,756	39,903,431	40,405,160	40,844,559	41,237,962
к	Estimated Residential Capacity Clause 1,000 kWh Impact 5	(0.01)	(0.02)	(0.04)	(0.05)	(0.06)
L = E + K	Estimated Residential Clause 1,000 kWh Impact	(0.19)	(0.20)	(0.23)	(0.25)	(0.27)

Notes:

- 1 Price Impact estimates are presented prior to Gross Receipt Tax (GRT). A negative price impact reflects a favorable reduction to DEF's customer price.
- 2 The Jurisdictional Separation Factor is based on the system average factor in the Fuel Clause and was calculated consistent with the methology used in DEF's Fuel Filings.
- 3 Impact is estimated using a Residential 1st Tier Fuel price methology by applying a 92.9% 1st Tier Factor. This factor is ratio between DEF's 2018 1st Tier Residential Fuel Price of 3.838 c/kWh and the Secondary Metering rate of 4.132 c/kWh.
- 4 The Jurisdictional Separation Factor is based on the Production Base separation factor of 92.885% as set forth in Exhibit 1 of DEF's 2017 Settlement Agreement, approved in Order No. PSC-2017-0451-AS-EU.
- 5 Impact is estimated using a Residential Capacity Clause price methodology by applying a 1.18 factor. This factor is the ratio between DEF's 2018 Residential Capacity Clause Price of 1.433 c/kWh and the average retail rate of 1.212 c/kWh.

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Ridge Termination - Estimated Residential Price Impact - Middle Band (246 GWh)¹ \$ in millions

		2019	2020	2021	2022	2023
A	System Fuel Savings	(7.3)	(7.4)	(7.7)	(8.3)	(8.8)
В	Jurisdictional Separation Factor ²	99.5%	99.5%	99.5%	99.5%	99.5%
C = A x B	Net Retail Customer Fuel (Savings) / Cost	(7.3)	(7.3)	(7.7)	(8.3)	(8.8)
D	Retail MWh Sales	39,174,756	39,903,431	40,405,160	40,844,559	41,237,962
E	Estimated Residential Fuel Clause 1,000 kWh Impact ³	(0.17)	(0.17)	(0.18)	(0.19)	(0.20)
F	System Capacity Savings	(9.6)	(9.6)	(9.6)	(9.6)	(9.6)
G	Ridge Regulatory Asset Revenue Requirement	9.3	8.8	8.3	7.7	7.2
H = F + G	Net System Capacity (Savings) / Cost	(0.3)	(0.8)	(1.4)	(1.9)	(2.4)
I	Jurisdictional Separation Factor ⁴	92.885%	92.885%	92.885%	92.885%	92.885%
J = H x I	Net Retail Customer Capacity (Savings) / Cost	(0.3)	(0.8)	(1.3)	(1.8)	(2.3)
D	Retail MWh Sales	39,174,756	39,903,431	40,405,160	40,844,559	41,237,962
к	Estimated Residential Capacity Clause 1,000 kWh Impact 5	(0.01)	(0.02)	(0.04)	(0.05)	(0.06)
L = E + K	Estimated Residential Clause 1,000 kWh Impact	(0.18)	(0.19)	(0.22)	(0.24)	(0.26)

Notes:

- 1 Price Impact estimates are presented prior to Gross Receipt Tax (GRT). A negative price impact reflects a favorable reduction to DEF's customer price.
- 2 The Jurisdictional Separation Factor is based on the system average factor in the Fuel Clause and was calculated consistent with the methology used in DEF's Fuel Filings.
- 3 Impact is estimated using a Residential 1st Tier Fuel price methology by applying a 92.9% 1st Tier Factor. This factor is ratio between DEF's 2018 1st Tier Residential Fuel Price of 3.838 c/kWh and the Secondary Metering rate of 4.132 c/kWh.
- 4 The Jurisdictional Separation Factor is based on the Production Base separation factor of 92.885% as set forth in Exhibit 1 of DEF's 2017 Settlement Agreement, approved in Order No. PSC-2017-0451-AS-EU.
- 5 Impact is estimated using a Residential Capacity Clause price methodology by applying a 1.18 factor. This factor is the ratio between DEF's 2018 Residential Capacity Clause Price of 1.433 c/kWh and the average retail rate of 1.212 c/kWh.

Ridge Termination - Estimated Residential Price Impact - Lower Band (222 GWh)¹ \$ in millions

		2019	2020	2021	2022	2023
A	System Fuel Savings	(6.5)	(6.5)	(6.8)	(7.5)	(7.8)
В	Jurisdictional Separation Factor ²	99.5%	99.5%	99.5%	99.5%	99.5%
C = A x B	Net Retail Customer Fuel (Savings) / Cost	(6.5)	(6.5)	(6.8)	(7.5)	(7.8)
D	Retail MWh Sales	39,174,756	39,903,431	40,405,160	40,844,559	41,237,962
E	Estimated Residential Fuel Clause 1,000 kWh Impact ³	(0.15)	(0.15)	(0.16)	(0.17)	(0.18)
F	System Capacity Savings	(9.6)	(9.6)	(9.6)	(9.6)	(9.6)
G	Ridge Regulatory Asset Revenue Requirement	9.3	8.8	8.3	7.7	7.2
H = F + G	Net System Capacity (Savings) / Cost	(0.3)	(0.8)	(1.4)	(1.9)	(2.4)
I	Jurisdictional Separation Factor ⁴	92.885%	92.885%	92.885%	92.885%	92.885%
J = H x I	Net Retail Customer Capacity (Savings) / Cost	(0.3)	(0.8)	(1.3)	(1.8)	(2.3)
D	Retail MWh Sales	39,174,756	39,903,431	40,405,160	40,844,559	41,237,962
к	Estimated Residential Capacity Clause 1,000 kWh Impact 5	(0.01)	(0.02)	(0.04)	(0.05)	(0.06)
L = E + K	Estimated Residential Clause 1,000 kWh Impact	(0.16)	(0.17)	(0.20)	(0.22)	(0.24)

Notes:

- 1 Price Impact estimates are presented prior to Gross Receipt Tax (GRT). A negative price impact reflects a favorable reduction to DEF's customer price.
- 2 The Jurisdictional Separation Factor is based on the system average factor in the Fuel Clause and was calculated consistent with the methology used in DEF's Fuel Filings.
- 3 Impact is estimated using a Residential 1st Tier Fuel price methology by applying a 92.9% 1st Tier Factor. This factor is ratio between DEF's 2018 1st Tier Residential Fuel Price of 3.838 c/kWh and the Secondary Metering rate of 4.132 c/kWh.
- 4 The Jurisdictional Separation Factor is based on the Production Base separation factor of 92.885% as set forth in Exhibit 1 of DEF's 2017 Settlement Agreement, approved in Order No. PSC-2017-0451-AS-EU.
- 5 Impact is estimated using a Residential Capacity Clause price methodology by applying a 1.18 factor. This factor is the ratio between DEF's 2018 Residential Capacity Clause Price of 1.433 c/kWh and the average retail rate of 1.212 c/kWh.

Year	Month	Сар	acity Payment	Energy Payment	C Ra	Capacity te (\$/kW)	(1	Energy Rate* \$/MWh)	Capacity Factor**	F	Monthly As Available Rate(\$/MWh)
2014	January	\$	691,368.07	\$ 870,883.28	\$	19.75	\$	61.03	77.06%	\$	35.73
	February	\$	667,514.06	\$ 843,903.59	\$	19.75	\$	59.71	75.28%	\$	42.39
	March	\$	659,566.47	\$ 968,481.51	\$	19.75	\$	59.09	74.68%	\$	35.97
	April	\$	650,874.67	\$ 490,956.33	\$	19.75	\$	59.12	74.02%	\$	38.73
	May	\$	648,084.98	\$ 1,055,264.05	\$	19.75	\$	59.82	73.81%	\$	41.51
	June	\$	655,799.14	\$ 1,061,876.65	\$	19.75	\$	60.24	74.39%	\$	40.06
	July	\$	639,905.24	\$ 917,310.77	\$	19.75	\$	60.02	73.19%	\$	40.65
	August	\$	645,601.47	\$ 1,068,564.18	\$	19.75	\$	59.87	73.62%	\$	41.16
	September	\$	641,587.95	\$ 1,015,008.16	\$	19.75	\$	59.46	73.31%	\$	37.71
	October	\$	640,346.67	\$ 832,280.03	\$	19.75	\$	58.83	73.22%	\$	35.10
	November	\$	646,175.47	\$ 1,091,631.94	\$	19.75	\$	58.19	73.66%	\$	33.73
	December	\$	660,150.57	\$ 1,212,279.17	\$	19.75	\$	58.21	74.72%	\$	29.84

Ridge Generating Station

Year	Month	Сар	acity Payment	Energy Payment	Capacity Rate (\$/kW))	Energy Rate* (\$/MWh)	Capacity Factor**	R	Monthly As Available ate(\$/MWh)
2015	January	\$	698,573.85	\$ 1,251,426.56	\$ 19.75	5	\$ 60.11	77.59%	\$	26.54
	February	\$	716,138.72	\$ 1,098,785.64	\$ 19.75		\$ 60.69	78.89%	\$	26.31
	March	\$	730,891.30	\$ 575,189.12	\$ 19.75		\$ 60.73	79.97%	\$	27.93
	April	\$	739,002.22	\$ 1,201,116.69	\$ 19.75		\$ 61.19	80.56%	\$	29.05
	May	\$	754,330.43	\$ 1,275,845.19	\$ 19.75		\$ 61.33	81.67%	\$	29.77
	June	\$	717,450.01	\$ 766,639.41	\$ 19.75		\$ 61.44	78.98%	\$	27.04
	July	\$	677,120.11	\$ 495,304.74	\$ 19.75	5	\$ 59.96	76.00%	\$	27.06
	August	\$	665,501.86	\$ 949,109.43	\$ 19.75	5	\$ 59.24	75.12%	\$	28.24
	September	\$	655,231.93	\$ 901,428.37	\$ 19.75	5	\$ 58.02	74.35%	\$	26.09
	October	\$	623,134.32	\$ 408,766.25	\$ 19.75	5	\$ 56.72	71.90%	\$	24.49
	November	\$	622,230.46	\$ 1,061,238.87	\$ 19.75	5	\$ 54.92	71.83%	\$	22.99
	December	\$	603,090.33	\$ 949,586.60	\$ 19.75	5	\$ 53.77	70.35%	\$	16.86

Year	Month	Сар	acity Payment	Ene	ergy Payment	C Rat	apacity e (\$/kW)	(5	Energy Rate* \$/MWh)	Capacity Factor**	R	Monthly As Available ate(\$/MWh)
2016	January	\$	584,734.82	\$	910,804.76	\$	19.75	\$	52.64	68.92%	\$	20.85
	February	\$	575,947.25	\$	877,694.10	\$	19.75	\$	52.75	68.22%	\$	18.69
	March	\$	555,284.07	\$	739,482.78	\$	19.75	\$	53.04	66.58%	\$	19.36
	April	\$	532,520.47	\$	-	\$	19.75	\$	54.67	64.75%	\$	21.71
	May	\$	498,052.95	\$	430,830.09	\$	19.75	\$	53.78	61.93%	\$	23.10
	June	\$	349,979.81	\$	687,384.00	\$	19.75	\$	54.53	64.24%	\$	30.08
	July	\$	562,273.67	\$	807,099.81	\$	19.75	\$	55.17	67.14%	\$	38.19
	August	\$	564,061.65	\$	900,423.21	\$	19.75	\$	56.82	67.28%	\$	30.67

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September	\$ 591,078.24	\$ 1,120,644.01	\$ 19.75	\$ 56.89	69.41%	\$ 30.78
October	\$ 636,115.97	\$ 888,453.11	\$ 19.75	\$ 57.31	72.90%	\$ 27.00
November	\$ 636,292.90	\$ 1,077,137.94	\$ 19.75	\$ 57.32	72.91%	\$ 22.44
December	\$ 646,177.46	\$ 1,055,834.45	\$ 19.75	\$ 57.19	73.66%	\$ 28.28

Year	Month	Cap	acity Payment	Energy Payment	Capacity Rate (\$/kV	, ∕V)	Energy Rate* (\$/MWI	, 1)	Capacity Factor**	R	Monthly As Available ate(\$/MWh)
2017	January	\$	646,572.71	\$ 951,505.92	\$ 19.7	75	\$57.	50	73.69%	\$	27.03
	February	\$	648,924.01	\$ 951,682.84	\$ 19.7	75	\$58.	17	73.87%	\$	24.05
	March	\$	678,961.08	\$ 1,128,846.82	\$ 19.7	75	\$58.	41	76.13%	\$	29.04
	April	\$	684,116.43	\$ 610,280.51	\$ 19.7	75	\$ 59.	12	76.52%	\$	32.20
	May	\$	705,833.77	\$ 1,158,912.52	\$ 19.7	75	\$ 59.	23	78.13%	\$	31.29
	June	\$	719,622.87	\$ 1,216,525.42	\$ 19.7	75	\$ 59.	54	79.14%	\$	29.15
	July	\$	750,223.62	\$ 1,191,021.61	\$ 19.7	75	\$ 59.	43	81.37%	\$	30.37
	August	\$	765,133.94	\$ 1,039,059.00	\$ 19.7	75	\$ 59.	11	82.45%	\$	28.01
	September	\$	751,969.40	\$ 855,038.74	\$ 19.7	75	\$ 59.	33	81.50%	\$	31.25
	October	\$	754,930.75	\$ 755,043.88	\$ 19.7	75	\$ 59.	44	81.71%	\$	29.04
	November	\$	755,867.53	\$ 1,155,677.29	\$ 19.7	75	\$ 59.	67	82.11%	\$	29.92
	December	\$	765,871.72	\$ 1,191,147.65	\$ 19.7	75	\$ 59.	59	82.50%	\$	26.06

Year	Month	Сар	acity Payment	Energy Payment	Cap Rate	oacity (\$/kW)	(1	Energy Rate* \$/MWh)	Capacity Factor**	l Ri	Monthly As Available ate(\$/MWh)
2018	January	\$	790,759.89	\$ 1,261,255.22	\$	19.75	\$	60.17	84.00%	\$	33.65
	February	\$	798,927.31	\$ 1,066,508.68	\$	19.75	\$	59.95	84.86%	\$	23.84
	March	\$	800,945.78	\$ 1,233,404.65	\$	19.75	\$	59.91	85.85%	\$	25.24
	April	\$	800,945.78	\$ 744,392.93	\$	19.75	\$	60.43	86.45%	\$	29.59
	May	\$	800,945.78	\$ 1,369,849.27	\$	19.75	\$	61.09	87.67%	\$	26.73
	June	\$	800,945.78	\$ 1,191,401.47	\$	19.75	\$	61.34	87.36%	\$	27.48
	July										
	August										
	September										
	October										
	November										
	December										

* "On-peak"

** "Capacity Factor is the on-peak 12 month rolling average"