BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

|  |  |
| --- | --- |
| In re: Petition for a limited proceeding to approve first solar base rate adjustment, by Duke Energy Florida, LLC. | DOCKET NO. 20180149-EI  DATED: DECEMBER 5, 2018 |

# Staff's second Request for Production of Documents (Nos. 5-8)

Pursuant to Rule 28-106.206, Florida Administrative Code, and Rule 1.350, Florida Rules of Civil Procedure, the Staff of the Florida Public Service Commission, by and through its undersigned attorney, hereby serves the following Request for Production of Documents upon DUKE ENERGY FLORIDA, LLC. (DEF).

Please produce the following documents at the Florida Public Service Commission, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, no later than thirty days after service of this request for the purpose of inspection and copying.

# DEFINITIONS

As used herein, the word "documents" shall mean the original and any non-identical copies of any writing or record, including but not limited to a book, pamphlet, periodical, letter, memorandum, telegram, report, study, interoffice or intraoffice, handwritten or other notes, working paper, draft, application, permit, chart, paper, graph, survey, index, tape, disc, data sheet or data processing card, computer printout, or any other written, recorded, transcribed, filed or graphic matter, however produced or reproduced.

# DOCUMENTS REQUESTED

## Please provide in an electronic copy (Excel Format) independent and dependent variables in monthly series that DEF used to model and forecast Net Energy for Load, Winter Firm Peak, and Summer Firm Peak.

## Please provide in an electronic copy (Excel Format) all future projections of independent variables used as inputs to calculate fitted/predicted values for Net Energy for Load, Summer Firm Peak, and Winter Firm Peak.

## Please provide an electronic copy of econometric output produced in forecasting Net Energy for Load, Summer Firm Peak, and Winter Firm Peak. Include all model specifications and statistical output (coefficients, measures of fit, p-values, etc.) Produced for the Net Energy for Load forecast.

## Please refer to witness Borsch’s direct testimony, Exhibit BMHB-2, Page 8, line 9:

## Witness Borsch testifies that the load forecast contained in docket 20180149-EI uses DEF’s most recent official load forecast developed in the fall of 2017. If new forecasts have been constructed regarding Net Energy for Load, Summer Firm Peak, and Winter firm peak this fall 2018 please provide electronic copies (Excel Format) in response to the production of documents above for fall 2018 forecasts in addition to fall 2017.

|  |
| --- |
| /***s/ Jennifer Crawford*** |
| JENNIFER S. CRAWFORD  Attorney Supervisor |
| FLORIDA PUBLIC SERVICE COMMISSION  2540 Shumard Oak Blvd.  Tallahassee, FL 32399-0850  (850) 413-6199 |

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

|  |  |
| --- | --- |
| In re: Petition for a limited proceeding to approve first solar base rate adjustment, by Duke Energy Florida, LLC. | DOCKET NO. 20180149-EI  DATED: DECEMBER 5, 2018 |

# CERTIFICATE OF SERVICE

I HEREBY CERTIFY that STAFF'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS (Nos. 5-8) has been served by electronic mail to Matthew R. Bernier, 106 E. College Ave., Suite 800, Tallahassee, Florida 32301 and that a true copy has been furnished to the following by electronic mail this 5th day of December, 2018:

|  |  |
| --- | --- |
| Dianne Triplett  Duke Energy  299 First Avenue North  St. Petersburg, FL 33701  [Dianne.triplett@duke-energy.com](mailto:Dianne.triplett@duke-energy.com) | James W. Brew  Laura Wynn  PCS Phosphate- White Springs  1025 Thomas Jefferson Street, NW  Washington, DC 20007  [jbrew@smxblaw.com](mailto:jbrew@smxblaw.com)  [law@smxblaw.com](mailto:law@smxblaw.com) |
| Jon Moyle Jr.  Moyle Law Firm, P.A.  118 N. Gadsden St.  Tallahassee, FL 32301-1599  [jmoyle@moylelaw.com](mailto:jmoyle@moylelaw.com) | J. Kelly  Charles Rehwinkel  Office of Public Counsel  111 W Madison St. Room 812  Tallahassee, FL 32399-6588  [kelly.jr@leg.state.fl.us](mailto:kelly.jr@leg.state.fl.us)  rehwinkel.charles@leg.state.fl.us |

|  |
| --- |
| ***/s/ Jennifer Crawford*** |
| JENNIFER S. CRAWFORD  Attorney Supervisor |
| FLORIDA PUBLIC SERVICE COMMISSION  2540 Shumard Oak Blvd.  Tallahassee, FL 32399-0850  (850) 413-6199  [jcrawfor@psc.state.fl.us](mailto:jcrawfor@psc.state.fl.us). |