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# Public Service Commission

April 29, 2019

Dianne M. Triplett  
Duke Energy Florida, LLC  
299 First Avenue North  
St. Petersburg, FL 33701

**STAFF'S FIRST DATA REQUEST  
FOR APRIL 17, 2019 MOTION**  
*via email and U.S. mail*

Matthew R. Bernier  
Duke Energy Florida, LLC  
106 E. College Avenue, Suite 800  
Tallahassee, Florida 32301

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 and Mr. Bernier:

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

The purpose of the following staff data requests is to address DEF's April 17, 2019 Motion to Approve Reallocation of Electric Vehicle (EV) Charging Station Pilot Segments. Staff requests that DEF file its responses to the following questions by May 13, 2019.

1. Has DEF received a response from Florida Industrial Power Users Group (FIPUG) in regards to whether it objects to DEF's April 17, 2019 Motion (Motion)? If so, what is FIPUG's response?
2. Please explain the nature of multi-unit dwelling (MUD) boards which require approval for an executed Site Host Agreement (SHA) - their governance, responsibilities, and their legal authority.
3. What entity(ies) authorizes SHAs for MUDs other than MUD boards?
4. Approximately, how many MUDs has DEF solicited for purposes of advancing its EV Charging Station Pilot Program, and does DEF have an estimate of how many of those MUDs require approval from MUD boards for EV applicant authorization?

5. In DEF's Motion, Attachment A, page 1, the Company indicates it has a waiting list for 25 ports for the Public L2 segment. Staff notes that the Public L2 segment has 76 ports subscribed, which is more than the original allocation of 75 ports. Has DEF established a Public L2 waiting list, rather than proceeding with installations, due to the limit imposed on operating and maintenance expense identified in the 2017 Second Revised and Restated Settlement Agreement (2017 Agreement) at Paragraph 17.a.ii.? If not, what is the reason for the list?
6. Refer to DEF's Motion, Attachment A, page 1. DEF indicates that DC Fast units will fully subscribe by mid-year 2019, at 30 units. The Company proposes to revise this segment goal to 50 units, but current subscriptions are 14 units. Please support this proposed expansion of DC Fast units based on available market data.
7. Refer to DEF's Motion, Attachment A, page 1, table note. Please explain how DEF derived 340 ports total for non-MUD segment ports used to determine the Segment Percentage range targets for reallocation of MUD ports (Staff calculation: 530 total ports – 210 MUD ports = 320 Non-MUD ports).
8. DEF appears to expect to increase its MUD port subscriptions from 62 to 210, despite the challenges identified in DEF's Motion, Attachment A, page 2. DEF states that "interest is encouraging." Please explain how DEF intends to meet the revised target for MUD port subscriptions by December 31, 2019, thereby more than tripling its current total?
9. Is the Company's commitment to a minimum deployment of 530 Electric Vehicle Service Equipment (EVSE) as identified in the 2017 Agreement impacted by the Motion if less than 210 MUD subscriptions are in place by December 31, 2019, such that DEF implements its Segment Percentage reallocation plan? If so, please explain.
10. Why did the Company select a range percent target rather than a point percent target to sum to the 2017 Agreement's minimum 530 EVSE in the event that MUD segment ports do not reach 210 by December 31, 2019?
11. At this time, how many ports are installed by segment and in total?
12. Please reconcile MUD "Ports Requested" in the December 2018 EV Charging Station Pilot Program Report (Table 3) with MUD "Ports Subscribed" in DEF's Motion; wherein the report shows 85 MUD ports requested and the Motion, several months hence, shows 62 MUD ports subscribed. Are SHAs for MUD installations, prior to MUD board approval, considered "Ports Requested"?
13. Table 3 of DEF's December 2018 EV Charging Station Pilot Program Report indicates that 85 MUD segment ports had been requested at that time, and 6 MUD segment ports had been installed. For the MUD segment, what is the average period of time between the date of the SHA and average date of installation of the port(s)? Does DEF have a target for the installation lag?

Ms. Dianne M. Triplett & Mr. Matthew R. Bernier

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14. Compare the MUD SHA average approval time and the average installation lag. Which of these is a greater contributor to delays in pilot program data collection?

Please file all responses electronically no later than May 13, 2019, through the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6076 if you have any questions.

Sincerely,

*/s/ Margo A. DuVal*

Margo A. DuVal  
Senior Attorney

MAD/csc

cc: Office of Commission Clerk