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## **Public Service Commission**

April 29, 2019

Mr. Matthew Bernier, Esq. 106 East College Avenue, Suite 800 Tallahassee, FL 32301 Matt.Bernier@duke-energy.com STAFF'S FOURTH DATA REQUEST

RE: Docket No. 20180146-EI – Review of 2019-2021 storm hardening plan, Duke Energy Florida, LLC.

Dear Mr. Bernier,

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

Please refer to DEF's responses to staff's third data request.

- Please refer to data request number 1. DEF states that Rule 250C reads that if the structure does not exceed 18 meters (60 feet) above ground or water level, then the provisions for the Rule does not apply. However, it appears that Rule 250C states that for construction grade B or C, all structures, including those below 18 meters (60 feet), shall be designed to withstand the extreme wind load associated with the Basic Wind Speed, as specified by Figure 250-2, in any direction on the structure. The Rule further states that for those structures below 60 feet, the conductors should not be considered. Please explain your interpretation of the Rules 261A1c, 261A2e, 261A3d, and 250C.
- 2) Please refer to data request number 12.
  - a. Please explain what the "D", "T", and "Tx" represent in the row for Initiative 6.
  - b. Please explain why DEF is not estimating any costs for Initiatives 3, 4, and 6 for the years 2020 and 2021.
  - c. Please provide the estimated costs for Initiatives 3, 4, and 6 for the years 2020 and 2021. If DEF does not anticipate costs in these years, please explain why not.
  - d. Please explain if there are any changes to DEF's current plan for Initiatives 3-10. If yes, please provide an explanation of each change.
  - e. Please verify that the actual and estimated costs for Initiative 6 Post-Storm Data Collection and Forensic Analysis are correct.

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f. Does DEF have any suggested improvements/alternatives/modifications including the elimination, of any of the Ten Initiatives? If so, please explain.

Please file all responses electronically no later than Monday, May 13, 2019, on the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and Electronic Filing web Form. Please contact me at (850) 413-6584 or Penelope Buys at (850) 413-6518 if you have any questions.

Sincerely,

/s/Walt Trierweiler

Walt Trierweiler Senior Attorney

WLT/lms

cc: Office of Commission Clerk Office of Public Counsel