May 23, 2019

VIA ELECTRONIC MAIL

Adam J. Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Application for limited proceeding to approve 2017 second revised and restated settlement agreement, including certain rate adjustments by Duke Energy Florida, LLC; Docket No. 20170183-EI

Dear Mr. Teitzman:

Please find attached for electronic filing Duke Energy Florida, LLC’s Response to Staff’s Second Data Request for April 17, 2019 Motion (Nos. 1-5) in the above-referenced Docket.

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

Respectfully,

/s/ Dianne M. Triplett

Dianne M. Triplett

DMT/cmk
Attachment

cc: Parties of Record
CERTIFICATE OF SERVICE
Docket No. 20170183-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 23rd day of May, 2019.

/s/ Dianne M. Triplett
Attorney

Margo DuVal / Suzanne S. Brownless
Office of the General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
mduval@psc.state.fl.us
sbrownle@psc.state.fl.us

J.R. Kelly / Charles J. Rehwinkel / Patty Christensen
Office of Public Counsel
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, FL 32399
kelly.jr@leg.state.fl.us
rehwinkel.charles@leg.state.fl.us
christensen.patty@leg.state.fl.us

George Cavros
120 E. Oakland Park Blvd, Suite 105
Fort Lauderdale, FL 33334
george@cavros-law.com

Robert Scheffel Wright / John T. LaVia III
Gardner Law Firm
1300 Thomaswood Drive
Tallahassee, FL 32308
schef@gbwlegal.com
jlvia@gbwlegal.com

James W. Brew / Laura A. Wynn
Stone Mattheis Xenopoulos & Brew, P.C.
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, D.C. 20007
jbrew@smxblaw.com
law@smxblaw.com

Jon C. Moyle, Jr.
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
Duke Energy Florida, LLC’s Response to Staff’s Second Data Request for April 17, 2019 Motion (Nos. 1-5) re. Application for limited proceeding to approve 2017 second revised and restated settlement agreement, including certain rate adjustments, by Duke Energy Florida, LLC

Docket No. 20170183-EI

1. Please provide actual and projected capital cost, per unit and total, of Electric Vehicle Service Equipment (EVSE) for the four segments at full implementation under both the original allocation and the proposed reallocation of EVSE.

**RESPONSE:**

<table>
<thead>
<tr>
<th>Table 1 – Capital spend actuals and projections with current port allocations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Includes total capital costs of completed installs and quoted jobs underway</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Segment</th>
<th># Ports Priced</th>
<th>Original Target Ports Installed</th>
<th>Actual Capital (as of May 15, 2019)</th>
<th>Actual (Average) Capital Per Port</th>
<th>Projected Total Capital – Current Allocation</th>
</tr>
</thead>
<tbody>
<tr>
<td>DCFC</td>
<td>12</td>
<td>30</td>
<td>$469,157</td>
<td>$39,096</td>
<td>$1,172,893</td>
</tr>
<tr>
<td>MUD</td>
<td>59</td>
<td>325</td>
<td>$302,399</td>
<td>$5,125</td>
<td>$1,665,757</td>
</tr>
<tr>
<td>Public L2</td>
<td>73</td>
<td>75</td>
<td>$418,757</td>
<td>$5,736</td>
<td>$430,230</td>
</tr>
<tr>
<td>Workplace</td>
<td>57</td>
<td>100</td>
<td>$328,576</td>
<td>$5,764</td>
<td>$576,449</td>
</tr>
<tr>
<td>Total</td>
<td>201</td>
<td>530</td>
<td>$1,518,889</td>
<td>N/A</td>
<td>$3,845,329*</td>
</tr>
</tbody>
</table>

(Totals may not foot due to rounding)

<table>
<thead>
<tr>
<th>Table 2 – Capital Budget Impacts with ports Reallocated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Includes total capital costs of completed installs and quoted jobs underway</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Segment</th>
<th>Ports Installed after Reallocation</th>
<th>Projected Total Capital with Reallocated Ports</th>
</tr>
</thead>
<tbody>
<tr>
<td>DCFC</td>
<td>50</td>
<td>$1,954,821</td>
</tr>
<tr>
<td>MUD</td>
<td>210</td>
<td>$1,076,335</td>
</tr>
<tr>
<td>Public L2</td>
<td>130</td>
<td>$745,732</td>
</tr>
<tr>
<td>Workplace</td>
<td>140</td>
<td>$807,029</td>
</tr>
<tr>
<td>Total</td>
<td>530</td>
<td>$4,583,917*</td>
</tr>
</tbody>
</table>

(Totals may not foot due to rounding)

*DEF capital budget could have up to 10% variance due to potential upgrades needed i.e. transformer upgrade, panel upgrade, etc. Projected costs for these upgrades are difficult to predict as each install is a custom project and treated on case-to-case basis. DEF evaluates all jobs for budget impacts to make a final decision on whether to proceed with the job.

2. In response to Staff’s First Data Request, dated April 29, 2019, No. 8, DEF indicated it is unlikely it will meet the revised multi-unit dwelling (MUD) segment EVSE goal by 12/31/19. Assuming DEF does not meet the revised goals and the Company reallocates
remaining unsubscribed MUD EVSE to other segments at the end of 2019, how does DEF plan to install all 530 EVSE and remain under the $8.0 M cap imposed by the 2017 Second Revised and Restated Settlement Agreement, considering the higher capital costs of the DC Fast Charging (DCFC) segment units?

**RESPONSE:**

Any further reduction to the number of MUD units would be offset by increases across all other segments. Based on the current unit cost run rate, Public Level 2 and Workplace are in-line with MUD installed costs.

3. Please explain the reasons for the differences in the per unit O&M expenses for the four segments as shown in Table 2 – Program Costs, in DEF’s Electric Vehicle Charging Station Pilot Program Report, filed December 17, 2018.

**RESPONSE:**

In Table 2, freight and warranty were classified as O&M and should have been classified as capital, which impacts DCFC more than the other segments. Generally, MUD, Public L2 and Workplace are expected to have similar O&M annual costs per port. DEF expects O&M costs across these segments to be more in-line as the installed EVSE totals increase. DCFC will not have the same network fees, which is an O&M cost, as the other three segments.

4. Referring to the Motion, Attachment A, Page 3, please identify any changes in DCFC per unit costs based on assumed greater number of units per site, and how DEF plans to increase the number of DCFC units per site.

**RESPONSE:**

DEF does not anticipate any changes in the DCFC per unit costs for any additional units. DEF plans installations for multiple units per site to provide redundancy for the increasing number of all electric vehicles coming to market. DEF looks to place DCFC in key Florida corridors we serve and that have seen significant growth.

5. Please explain the meaning of the capital expenses in Table 2- Program Costs, in DEF’s Electric Vehicle Charging Station Pilot Program Report, filed December 17, 2018. Are these amounts the capital costs (total and per port), rather than annualized capital expense amounts?

**RESPONSE:**

Those are actual capital costs and not annualized capital expense amounts.