



Dianne M. Triplett
Deputy General Counsel

January 10, 2020

VIA ELECTRONIC FILING

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

Re: *Duke Energy Florida, LLC's Petition for Approval of a New Depreciation Class and Rate for Energy Storage Equipment; Docket No. 20190183-EI*

Dear Mr. Teitzman:

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 (Nos. 1-2).

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/cw
Enclosures

cc: Suzanne Brownless, FPSC
J. R. Kelly, OPC

CERTIFICATE OF SERVICE
(Dkt. No. 20190183-EI)

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the following by electronic mail this 10th day of January, 2020, to all parties of record as indicated below.

s/Dianne M. Triplett
Attorney

S. Brownless Office of General Counsel Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 sbrownle@psc.state.fl.us	J.R. Kelly Office of Public Counsel c/o The Florida Legislature 111 West Madison St., Rm. 812 Tallahassee, FL 32399-1400 kelly.jr@leg.state.fl.us
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Duke Energy Florida, LLC's (DEF) Response to Staff's Second Data Request (Nos. 1-2) Regarding DEF's Petition for Approval of a New Depreciation Class and Rate for Energy Storage Equipment

Docket No. 20190183-EI

Data Requests

1. Please refer to Duke Energy Florida's (DEF) Response to Staff's First Data Request, No. 4. DEF has stated that it has tentatively scheduled four installation sites for battery and/or storage-associated equipment. DEF has previously stated in regards to plans to implement a "50 MW Battery Storage Pilot" (Battery Storage Pilot) as approved in Public Service Commission (Commission) Order No. PSC-2017-0451-AS-EU, that "The Parties to this 2017 Second Revised and Restated Settlement Agreement will work cooperatively regarding the location of the battery storage projects; however, DEF shall ultimately be responsible for determining the projects and locations that provide the most benefits at the time of installation." Please describe DEF's efforts to "work cooperatively" with these parties to the settlement regarding the tentatively scheduled installation sites.

RESPONSE:

On April 10, 2019, DEF made a confidential presentation to the attorneys representing the 2017 Settlement Signatories to provide an update on DEF's battery storage pilot, which included details on the proposed locations. It was a robust discussion during which DEF answered several questions on the pilot.

2. Please refer to DEF's Response to Staff's First Data Request, No. 11 (c). DEF has stated that it expects at least a 2-year warranty from the manufacturer for the battery/energy storage equipment. Considering DEF expects a 10-year life for equipment, what ratepayer protection is contemplated if the equipment significantly degrades or fails during years 3-10?

RESPONSE:

REDACTED

Duke Energy Florida (DEF) expects to enter into two contracts with the same firm for each energy storage project - an Engineering, Procurement and Construction contract, and a Long-Term Service Agreement (LTSA). Between the two contracts, DEF anticipates that customers will be protected by a

