

Matthew R. Bernier ASSOCIATE GENERAL COUNSEL

July 20, 2020

VIA ELECTRONIC FILING

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

> Re: Review of 2020-2029 Storm Protection Plan Pursuant to Rule 25-6.030, F.A.C., Docket No. 20200069-EI Storm Protection Plan Cost Recovery Clause; Docket No. 20200092-EI

Dear Mr. Teitzman:

Please find attached for filing updated Exhibits A and B to Attachment 1 of Duke Energy Florida, LLC's (DEF) Motion to Approve 2020 SPP/SPPCRC Agreement which was electronically filed on July 17, 2020, in the above-referenced Dockets (Document No. 03874-2020). Please note there are no substantive changes; DEF is removing the header information that should have been removed prior to filing the Agreement.

Thank you for your assistance in this matter. Please feel free to call me at (850) 521-1428 should you have any questions concerning this filing.

Sincerely,

/s/ Matthew R. Bernier

Matthew R. Bernier

MRB/cmk Enclosures

cc: Parties of Record

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via electronic mail to the following this 20th day of July, 2020.

J. Crawford / C. Murphy / R. Dziechciarz Office of General Counsel FL Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 jcrawfor@psc.state.fl.us cmurphy@psc.state.fl.us rdziechc@psc.state.fl.us

Ken Hoffman / Mark Bubriski 134 West Jefferson St. Tallahassee, FL 32301-1713 <u>ken.hoffman@fpl.com</u> mark.bubriski@nexteraenergy.com

John T. Burnett / Christopher T. Wright / Jason A. Higginbotham Florida Power & Light Company 700 Universe Blvd. Juno Beach, FL 33408-0420 john.t.burnett@fpl.com christopher.wright@fpl.com jason.higginbotham@fpl.com

Stephanie Eaton 110 Oakwood Dr., Ste. 500 Winston-Salem, NC 27013 seaton@spilmanlaw.com

Derrick Price Williamson / Barry Naum 1100 Bent Creek Blvd., Ste. 101 Mechanicsburg, PA 17050 <u>dwilliamson@spilmanlaw.com</u> <u>bnaum@spilmanlaw.com</u> /s/ Matthew R. Bernier Attorney

J.R. Kelly / Charles Rehwinkel Office of Public Counsel c/o The Florida Legislature 111 W. Madison St., Room 812 Tallahassee, FL 32399-1400 kelly.jr@leg.state.fl.us rehwinkel.charles@leg.state.fl.us

Russell A. Badders Gulf Power Company One Energy Place Pensacola, FL 32520 russell.badders@nexteraenergy.com

Mike Cassel 208 Wildlight Ave. Yulee, FL 32097 mcassel@fpuc.com

Paula K. Brown Regulatory Affairs P.O. Box 11 Tampa, FL 33601-0111 regdept@tecoenergy.com

James A. Brew / Laura Wynn Baker 1025 Thomas Jefferson St., N.W., Ste. 800W Washington, DC 20007 jbrew@smxblaw.com lwb@smxblaw.com

Jon C. Moyle, Jr. / Karen A. Putnal 118 North Gadsden Street Tallahassee, FL 32301 jmoyle@moylelaw.com kputnal@moylelaw.com mqualls@moylelaw.com

EXHIBIT A

DUKE ENERGY FLORIDA, LLC Storm Protection Plan Cost Recovery Clause Calculation of Projected Period Amount January 2021 - December 2021

ILLUSTRATIVE EXAMPLE

Return on Capital Investments, Depreciation and Taxes For Project: Structure Hardening - Wood to Non-Wood Pole Replacements -- Transmission

(in Dollars)

Line	Description		Beginning of Period Amount	Projected Jan-21	Projected Feb-21	Projected Mar-21	Projected Apr-21	Projected May-21	Projected Jun-21	Projected Jul-21	Projected Aug-21	Projected Sep-21	Projected Oct-21	Projected Nov-21	Projected Dec-21	End of Period Total
1	Investments a. Expenditures/Additions b. Clearings to Plant c. Pole Replacement Activity currently recovered throug d. Other	h 2021 Base Rates	4 000 000 0 (4 000 000)	\$2,000,000 2 000 000 (2,000,000) \$0	\$5,000,000 5 000 000 (3,800,000) \$0	\$9,000,000 9 000 000 (2,900,000) \$0	\$6,000,000 6 000 000 (2,900,000) \$0	\$5,000,000 5 000 000 (2,900,000) \$0	\$5,000,000 5 000 000 (2,900,000) \$0	\$6,000,000 6 000 000 (2,900,000) \$0	\$7,000,000 7 000 000 (2,900,000) \$0	\$7,000,000 7 000 000 (2,900,000) \$0	\$5,000,000 5 000 000 (2,900,000) \$0	\$7,000,000 7 000 000 (2,900,000) \$0	\$7,000,000 7 000 000 (2,900,000) \$0	\$71,000,000 71 000 000 (34,800,000)
2 3 4	SPPCRC Plant-in-Service/Depreciation Base Less: Accumulated Depreciation CWIP - Non-Interest Bearing		\$0 \$0 \$0	0 0 0	1 200 000 (3 300) 0	7 300 000 (23 375) 0	10 400 000 (51 975) 0	12 500 000 (86 350) 0	14 600 000 (126 500) 0	17 700 000 (175 175) 0	21 800 000 (235 125) 0	25 900 000 (306 350) 0	28 000 000 (383 350) 0	32 100 000 (471 625) 0	36 200 000 (571 175) 0	36,200,000
5	Net Investment (Lines 2 3 4)			\$0 \$0	\$1 196 700	\$7 276 625 \$4 236 663	\$10 348 025 \$8 812 325	\$12 413 650 \$11 380 838	\$14 473 500 \$13 443 575	\$17 524 825	\$21 564 875 \$19 544 850	\$25 593 650 \$23 579 263	\$27 616 650 \$26 605 150	\$31 628 375 \$29 622 513	\$35 628 825	
6	Average Net Investment			ŞU	2288 320	\$4 236 663	\$8 812 325	\$11 380 838	\$13 443 575	212 223 103	\$19 544 850	\$23 579 263	\$26 605 150	\$29 622 513	\$33 628 600	
7	Return on Average Net Investment (1) a. Debt Component b. Equity Component Grossed Up For Taxes c. Other	Jan-Dec 1.83% 6.16%		\$0 \$0 \$0	\$912 \$3 072 \$0	\$6 461 \$21 748 \$0	\$13 439 \$45 237 \$0	\$17 356 \$58 422 \$0	\$20 501 \$69 010 \$0	\$24 399 \$82 129 \$0	\$29 806 \$100 330 \$0	\$35 958 \$121 040 \$0	\$40 573 \$136 573 \$0	\$45 174 \$152 062 \$0	\$51 284 \$172 627 \$0	285 863 962 250 0
8	Investment Expenses a. Depreciation b. Anortization c. Dismantlement d. Property Taxes 0	3.30%	_	\$0 \$0 N/A \$0	\$3 300 \$0 N/A \$765	\$20 075 \$0 N/A \$4 654	\$28 600 \$0 N/A \$6 631	\$34 375 \$0 N/A \$7 970	\$40 150 \$0 N/A \$9 309	\$48 675 \$0 N/A \$11 285	\$59 950 \$0 N/A \$13 899	\$71 225 \$0 N/A \$16 513	\$77 000 \$0 N/A \$17 852	\$88 275 \$0 N/A \$20 466	\$99 550 \$0 N/A \$23 081	571 175 0 N/A 132 426
9	Total System Recoverable Expenses (Lines 7 8) a. Recoverable Costs Allocated to Energy b. Recoverable Costs Allocated to Demand			\$0 0 \$0	\$8,049 0 \$8 049	\$52,938 0 \$52 938	\$93,906 0 \$93 906	\$118,122 0 \$118 122	\$138,971 0 \$138 971	\$166,488 0 \$166 488	\$203,985 0 \$203 985	\$244,737 0 \$244 737	\$271,998 0 \$271 998	\$305,978 0 \$305 978	\$346,541 0 \$346 541	\$1,951,714 0 \$1 951 714
10 11	Energy Jurisdictional Factor Demand Jurisdictional Factor - Distribution			N/A 0.70203	N/A 0.70203	N/A 0.70203	N/A 0.70203	N/A 0.70203	N/A 0.70203	N/A 0.70203	N/A 0.70203	N/A 0.70203	N/A 0.70203	N/A 0.70203	N/A 0.70203	
12 13 14	Retail Energy-Related Recoverable Costs Retail Demand-Related Recoverable Costs Total Jurisdictional Recoverable Costs (Lines 12 13)		-	\$0 0 \$0	\$0 5 651 \$5 651	\$0 37 164 \$37 164	\$0 65 925 \$65 925	\$0 82 925 \$82 925	\$0 97 561 \$97 561	\$0 116 880 \$116 880	\$0 143 204 \$143 204	\$0 171 813 \$171 813	\$0 190 951 \$190 951	\$0 214 806 \$214 806	\$0 243 282 \$243 282	\$0 1 370 162 \$1 370 162

Notes:

Note 1: Assumed WACC will be updated as needed in SPPCRC filing to be consistent with Order PSC-2020-0165-PAA-EU in Docket No. 20200118-EU

Note 2: Assumed spend by month is for illustrative purposes only. These numbers will be updated with SPPCRC filings.

Note 3: Assumed beginning balance is for illustrative purposes only; beginning balance will be adjusted out as shown so no revenue requirements associated with it will be recovered through SPPCRC in 2021.

Note 4: Annual spend excludes COR consistent with spend eligible for recovery through SPPCRC.

Monthly Adjustment Basis Calculation

Ann. Spend on Wood to Non-wood Trans Pole Replacement \$ millions

40.5

2018 30.2 2019 33.6

Average 34.8 Spend excludes COR consistent with spend eligible for recovery through SPPCRC.

	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected	TOTAL
O&M Expenses	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	2021
TOTAL 0&M	106 056	265 141	477 254	318 169	265 141	265 141	318 169	371 197	371 197	265 141	371 197	371 197	3 765 000
SPPCRC O&M	54,089	135,222	243,399	162,266	135,222	135,222	162,266	189,311	189,311	135,222	189,311	189,311	1,920,150 51%
Base O&M	51 968	129 919	233 854	155 903	129 919	129 919	155 903	181 887	181 887	129 919	181 887	181 887	1 844 850 49%
	141 CODODO (111												

Note 5: Assumed O&M spend by month is for illustrative purposes only. These numbers will be updated with SPPCRC filings.

Exhibit A

EXHIBIT B

		Recov Mech:	Base CRC			Page 1 of
Capital (millions)	Program	Activity	2021	2022	Notes:	Expected Impacted Accounts
		Structure Strengthening, BIL, Conductor Upgrades,				
		Relocating Difficult to Access Facilities, Replacing Oil-				
Distribution	Feeder Hardening	Filled Equipment	60.0	90.0	New program, no costs have been included in base rates.	360, 364, 365, 368
					Planned inspection and pole replacement included in this	,,,,
					line. Poles replaced due to an unplanned event, like a car	
					hitting a pole, will continue to be recovered through base	
Distribution	Feeder Hardening	Pole Inspection & Replacement	22.1	15.6	rates.	364, 365, 368
		Lateral Undergrounding, OH Hardening, Structure				
		Strengthening, Conductor Upgrades, Upgrade Open				
Distribution	Lateral Hardening	Wire Secondary, Fusing, Line Relocation, Hazard Tree	83.8	140.0	Contains elements of legacy TUG and Detriorated Conduct	or. 360, 364, 365, 366, 367, 368
	5		Part of		Planned inspection and pole replacement included in this	
			\$22M		line. Poles replaced due to an unplanned event, like a car	
			shown		hitting a pole, will continue to be recovered through base	
Distribution	Lateral Hardening	Pole Inspection & Replacement	above	40.0	rates.	364, 365, 367, 368
Distribution	SOG	Capacity, Connectivity, Automation	79.7	75.0		362, 364, 365, 366, 367, 368, 369
		Raise pad mount xfmr, waterproof connections,			This is a new program, no costs have been included in base	
Distribution	UG Flood Mitigation	submersible switchgear	N/A	0.5	rates.	366, 367, 368
Distribution	VM		1.9	1.9		364, 365, 368
Fransmission	Structure Hardening	Wood to non-wood upgrade	34.8		2021 base amount is the 2017-2019 average.	355, 356
Fransmission	Structure Hardening	Wood to non-wood upgrade	36.2	119.8		355, 356
Fransmission	Structure Hardening	Tower Upgrade	2.0	4.0	New activitiy, no costs have been included in base rates.	354, 356
Fransmission	Structure Hardening	Cathodic Protection	1.0	1.5	New activitiy, no costs have been included in base rates.	354, 356
Transmission	Structure Hardening	Gang Operated Air Break, OH Ground Wire	-	7.0	New activitiy, no costs have been included in base rates.	354, 355, 356
Transmission	Substation Flood Mitigation		-	-	New program, no costs have been included in base rates.	352, 353
ransmission	Loop Radially-Fed Substations		-	-	New program, no costs have been included in base rates.	350, 352, 353, 355, 356
ransmission	Substation Hardening	Breaker upgrades, electronic relays	5.5	7.5		352, 353
Fransmission	VM		9.0	10.9		356

Note 1: Dollars shown above are consistent with DEF's Storm Protection Plan filed April 10, 2020. These values will change as Programs are engineered and implemented.

Note 2: Accounts shown are DEF's expectation of accounts impacted by the Plan today. Other accounts could be impacted as actual costs are incurred.

		Recov Mech	Base	CRC		Ez
0&M (millions)						
	Program	Activity	2021	2022	Notes:	Expected Impacted Accounts
		Structure Strengthening, BIL, Conductor Upgrades,				
		Relocating Difficult to Access Facilities, Replacing Oil-			New program, has not been a program to	
Distribution	Feeder Hardening	Filled Equipment	2.4	3.6	proactively harden feeders.	408, 593, 594, 926
					Planned inspection and pole replacement included	1
					in this line. Poles replaced due to an unplanned	
					event, like a car hitting a pole, will continue to be	
Distribution	Feeder Hardening	Pole Inspection & Replacement	5.5	2.1	recovered through base rates.	408, 583, 593, 926
		Lateral Undergrounding, OH Hardening, Structure				
		Strengthening, Conductor Upgrades, Upgrade Open			Contains elements of legacy TUG and Detriorated	
Distribution	Lateral Hardening	Wire Secondary, Fusing, Line Relocation, Hazard Tree	1.0	1.6	Conductor.	408, 593, 594, 926
			Part of		Planned inspection and pole replacement included	1
			\$5.5M		in this line. Poles replaced due to an unplanned	
			shown		event, like a car hitting a pole, will continue to be	
Distribution	Lateral Hardening	Pole Inspection & Replacement	above	5.5	recovered through base rates.	408, 583, 593, 926
Distribution	SOG	Capacity, Connectivity, Automation	1.6	1.5		408, 593, 926
		Raise pad mount xfmr, waterproof connections,			This is a new program, no spend has been	
Distribution	UG Flood Mitigation	submersible switchgear	-	-	included in base rates previously.	408, 593, 926
Distribution	VM		42.6	43.9		408, 593, 926
Fransmission	Structure Hardening	Wood to non-wood upgrade	0.8			408, 571, 926
Fransmission	Structure Hardening	Wood to non-wood upgrade	1.0	3.0		408, 571, 926
ransmission	Structure Hardening	Structure Inspections	0.4	0.4		408, 563, 926
ransmission	Structure Hardening	Drone Inspections	0.1	0.1		408, 563, 926
ransmission	Structure Hardening	Tower Upgrade	0.017	0.033		408, 571, 926
Fransmission	Structure Hardening	Cathodic Protection	0.4	0.4		408, 571, 926
ransmission	Structure Hardening	Gang Operated Air Break, OH Ground Wire	-	0.013		408, 571, 926
					New program, no costs have been included in	
ransmission	Substation Flood Mitigation		-	-	base rates.	
					New program, no costs have been included in	
ransmission	Loop Radially-Fed Substations		-	-	base rates.	
ransmission	Substation Hardening	Breaker upgrades, electronic relays	-	-		
ransmission	VM		8.2	8.5		408, 571, 926

Note 1: Dollars shown above are consistent with DEF's Storm Protection Plan filed April 10, 2020. These values will change as Programs are engineered and implemented.

Note 2: Accounts shown are DEF's expectation of accounts impacted by the Plan today. Other accounts could be impacted as actual costs are incurred.

Note 3: In addition to the amounts shown above, DEF may include an estimate of incemental costs more administrative in nature. Examples could include: external legal costs associated with FPSC activities, travel for participation in FPSC proceedings associated with the Plan, potential FTE needed for tracking and reporting.

Capital

Account	Description	Area
362	Station Equipment	Distribution
364	Poles, towers and fixtures	Distribution
365	OH conductors and devices	Distribution
366	UG conduits	Distribution
367	UG conductors and devices	Distribution
368	Line transformers	Distribution
369	Services	Distribution
354	Towers and fixtures	Transmission
355	Poles and fixtures	Transmission
356	OH conductors and devices	Transmission
352	Structures and improvements	Transmission
353	Station Equipment	Transmission
361	Structures and improvements	Distribution
360	Land and land rights	Distribution
350	Land and land rights	Transmission
359	Roads and trails	Transmission

O&M

Account	Description	Area
408	Taxes other than income taxes, utility operating income.	Taxes
583	Overhead line expenses	Distribution
593	Maintenance of overhead lines	Distribution
594	Maintenance of underground lines	Distribution
563	Overhead line expenses	Transmission
571	Maintenance of OH Lines	Transmission
926	Employee pensions and benefits	Operation