



Matthew R. Bernier  
ASSOCIATE GENERAL COUNSEL

October 7, 2020

**VIA ELECTRONIC FILING**

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

Re: *Comments on Staff's Proposed Changes – Rules 25-6.0141, Florida Administrative Code (F.A.C.), Allowance for Funds Used During Construction; Undocketed*

Dear Mr. Teitzman:

This letter is submitted on behalf of Duke Energy Florida, LLC (“DEF”). DEF appreciates the opportunity to provide comments to Staff’s proposed changes to Rules 25-6.0141 F.A.C., Allowance for Funds Used During Construction.

On June 10, 2020, the Florida Public Service Commission (“FPSC” or “Staff”) Issued a Notice of Development of Rulemaking for the Proposed Amendment of Rule 25-6.0141, Allowance for Funds used During Construction, , F.A.C., 25-30.116, Allowance for Funds Used During Construction, F.A.C., and Adoption of Rule 25-7.0141, Allowance for Funds Used During Construction, F.A.C. Staff conducted a Rulemaking Workshop on June 29, 2020. DEF filed Post-Workshop Comments on July 27, 2020 (DN 04065-2020) re. Rule 25-6.0141. Following the workshop and review of post-workshop comments, Staff provided a revised draft of Rule 25-6.0141 on September 16, 2020 and requested that utilities file their comments on the proposed changes no later than October 7, 2020.

Pursuant to Staff’s request, DEF proposes the following changes to Staff’s proposed changes on Rule 25-6.0141, F.A.C. as discussed herein:

**Rule 25-6.0141**

On page 1, section (2)(a)1, Staff allocates additional Accounts 108, Accumulated Provision for Depreciation of Electric Utility Plant, and Account 111, Accumulated Provision for Amortization of Electric Utility Plant; however, this additional account allocation is not provided on page 2, § (2)(b)2 or page 5, § (9). DEF requests that Staff provide consistency throughout the

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rule to address the allocation of account numbers. This will provide clarity in all three sections accordingly.

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.

Respectfully,

*/s/ Matthew R. Bernier*

Matthew R. Bernier

MRB/cmw/cmK

cc: Adria Harper, Office of the General Counsel